

**Ofcom consultation : Applying spectrum pricing to the maritime sector, and new arrangements for the management of spectrum used for radar and aeronautical navigation aids**

**Submission by the Manchester Airports Group**

**6 November 2009**

1. This submission is made by the Manchester Airports Group (MAG) in response to the second consultation issued by Ofcom on 13 August 2009.
2. The general position of MAG in relation to Ofcom's proposals remains unchanged from that set out in our response dated 30 October 2008.
3. As the majority of the consultation questions in the current consultation document relate to the maritime sector, MAG will not be responding to these questions. We await with interest the outcome of the further work that Ofcom is undertaking with the Civil Aviation Authority's Directorate of Airspace Policy on the potential impacts of incentive pricing to aeronautical VHF frequencies, and which will be covered in a further consultation to be issued later this year.
4. Consequently, this response will be restricted to Question 18 :

*If the Government were to assume the strategic management role for the radar and aeronautical navigation aids spectrum that we propose, do you agree that we should not develop proposals for AIP licence fees ?*

MAG agrees with the suggestion that Ofcom should not develop proposals for AIP licence fees for radar and aeronautical navigational aids in the maritime and aeronautical sectors. We also agree that the strategic management of such spectrum should be undertaken by Government, and would support this role being devolved to the relevant sector regulators, i.e. the CAA and MCA jointly, or by the CAA with support from the MCA.

It is appropriate that this approach is taken as :

- Generally aviation spectrum is uncongested, and there is no need to use AIP as a means of managing 'excess demand'.
- Many of these bands are internationally allocated and subject to international obligations, making early release for other uses unlikely.
- Instead, increased spectrum efficiency in this area is more likely to arise as a result of central coordination and replanning, given the technical complexity of spectrum use and the diffuse nature of users of such spectrum.

- Government, via the CAA and MCA, is better placed to take decisions which impact long term transport policy considerations, including public safety and defence considerations.