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

Individual Response

I am an experienced (>40 years) civil private (former military) pilot, and have held pilot's and associated radio licences in 4 countries on 2 continents. I have also worked in the communications field (EM spectrum from DC to light!) for almost 40 years, in many countries and in close association with UK and allied Air Forces.

First, I am disturbed at the very title of this exercise. Spectrum pricing and the management of the aeronautical bands should have nothing to do with each other. Spectrum management of frequencies essential to safety should be managed only for the pursuit of safety, not for the revenue of a Government Agency (whether as an explicit 'tax' or an alleged 'administration fee'). This is certainly true of aeronautical bands, which are reserved for aeronautical purposes by international agreement for precisely that reason. I am not competent to judge whether some maritime frequencies are also essential to or mostly used for safety; but if they are, the same considerations should apply. This is obviously true for the marine Distress/Emergency frequencies (in all Bands); but I dare say that there are channels (for communication or navigation aids) as essential for managing maritime traffic safety in harbours or crowded navigation channels as ATC frequencies and aeronautical beacons are to the safety of aviation. But I am sure that respondents on the maritime issues will address this point.

But on the aeronautical aspects of the consultation: I am a member of the Aircraft Owners' and Pilots' Association of the UK, and of the Light Aircraft Association. I supported the LAA response to the first Consultation exercise, and I now support their response to this (of which I have seen a draft). There is no need for Ofcom to initiate an exercise differently to manage the aeronautical parts [sic, plural] of the spectrum in the absence of any evidence that the current management system is failing to meet the essential purpose of its use, that of the safety of aviation. I have seen no evidence of such shortcomings. And the claim that this supposedly needed change will necessitate costs which will need to be met by some sort of user fees suggests to me that the fundamental reason for the proposals is not effectiveness (in achieving the safety aim, the only one which matters) but the raising of revenues for Ofcom. Any increase in costs in the form of such fees would be likely to lead to aerodromes foregoing voice frequencies and on-airfield aids, which must be to the detriment of safety. My local airport (with

Tower, Approach, ATIS and 1 reserve frequency used when primary equipment fails or is undergoing maintenance) might reduce these 4 to 1 or 2; while local airstrips with their own Air-Ground frequency might relinquish this so that their pilots would join those at other nearby strips in using the crowded Safetycom one. In the Navigation bands, an airfield might forego an on-field VOR or DME or ILS for a less precise NDB and (or possibly only) a GPS approach (possibly unofficial and therefore uncalibrated); this would reduce safety in poor weather approaches. Meanwhile the foregone frequencies would become available for neighbouring countries (France, Eire, Belgium etc) to allocate to their users, so UK pilots would have lost their safety advantages while Ofcom would have lost the supposed but spurious revenue opportunity.

I urge you to abandon all plans to reorganize the management of the aeronautical Bands unless there is a clear safety case for the change, a clear safety benefit as the certain outcome, and no charging scheme which would make a less safe usage a cheaper one for aviators or aerodromes.

Yours Sincerely

Michael Fortescue