

*Response to Consultation for “Applying spectrum pricing to the maritime sector, and new arrangements for the management of spectrum used for radar and aeronautical navigation aids”*

I have now read the 158 page consultation document and would like to make the following responses.

You introduce the abbreviation “AIP” in relation to pricing when in aeronautical terms this abbreviation refers to the “Aeronautical Information Package” so leading to confusion.

You are proposing changes to the way in which aeronautical navigation aids are managed, but have neither indicated why the existing arrangements are inadequate nor any proposed benefits from a change.

In paragraphs 1.6 to 1.9 you indicate that charging for the frequencies will make the spectrum available to other users. This is flawed as the frequencies involved are defined by international agreements and as such are not available to other uses.

In 1.8 you indicate that the power of ground transmitters limits reuse of the spectrum. Surely this is wrong. The fact that aircraft are operating from significant altitudes means that the limitation for reuse is dependent on the aircraft transmission range. The suggestion that high demand around airports should result in higher charges is surely flawed logic when the relatively remote areas such as Norfolk are still within range of the London airport frequencies and the aircraft that use them.

In 1.9 you state that society can benefit from changing the way in which the aeronautical frequencies are charged. In most if not all cases these frequencies are used in order to safeguard the public whether directly through ensuring aircraft operate within a known environment, or simply ensuring that aircraft navigation is as accurate as possible to avoid incursions into controlled airspace for GA users and the safe use of the controlled airspace for commercial traffic. The logic that the charging of a service to an airfield operator for example benefits that airfield owner is in many requests flawed logic. The benefit will be gained primarily by the aircraft passing by the airfield and using the airfield. Increasing charges for it is not an effective way of ensuring safety. This being especially the case when GPS is not permitted to be used as primary aeronautical navigation.

If there is a shortage of spectrum for aeronautical stations, then a safety review as to which use would provide the greatest safety benefit would help maximise safety, rather than simply providing as much as required to anyone who is willing to pay. There is no alternative use that the spectrum can be assigned to as it is determined internationally.