

Question 1: How should Ofcom manage the process of taking advice from users, regulators and government on efficient apportionment of AIP fees in the maritime and aeronautical sectors? Are any new institutional arrangements needed?:

It would benefit all concerned if Ofcom got off its pedestal and visited the people who will be most affected by these charges.

A re-examination of Ofcom's aim is vital. Simply inflicting charges is a sledgehammer to crack a nut, and is a further tax on a specific section of the British public. This is unacceptable.

Question 2: If you consider that our proposals for pricing ground station users for any spectrum would be likely to have a detrimental impact on safety, please let us know. In order for us to understand your assessment fully, it would be helpful if you could outline the mechanisms whereby this might happen.?:

Even the most intellectually challenged will understand that these proposed charges will mean that various existing navigation aids, as well as various air/ground radio facilities around the country will be switched off. This will increase the amount of controlled airspace infringements and probably be a root cause of many collisions at small airfields.

Question 3: Do you have any evidence which indicates that AIP charged to ground stations could have a material detrimental impact on UK competitiveness?:

Do you have any clear evidence that these charges will not affect safety ?

Question 4: Taking into account the information available in this document, including that set out in Annex 5, our initial views on VHF radiocommunications licence fees and on the reference rates for bands in other uses, and any information you have about the organisations to whom we are proposing to charge fees, please provide any evidence that you think is relevant to us in considering the financial impact of the fees we intend to propose for VHF radiocommunications, or for other uses:

This question is designed to frustrate anyone answering it. It is stupefyingly obvious that if you put charges on or up, 'customers' will seek other means of satisfying their needs. You will find that pilots will tend to start using GPS systems to replace the usual 'nav aids' . . you have to hope that the accuracy of such systems is within acceptable limits.

Question 5: Do you agree that there is little to be gained, in terms of economic efficiency, from charging AIP to WT Act licences for aircraft:

Yes, obviously. Far too often are charges used in this country to try to modify bahavious, it never works. Training is the only sure method of flattening out the playing field, but that requires investment which Ofcom is clearly not interested in.

Question 6: Do you consider that we should discount fees for any particular user or type of user? Specifically, do you consider that there should be a discount for charities whose object is the safety of human life in an emergency:

There should be no charges at all for these systems . . as a Taxpayer I have paid for them already. I have also paid through the nose for the quango known as Ofcom.

Question 7: Do you agree that Ofcom should apply AIP to ground stations? use of maritime and aeronautical VHF radiocommunications channels, to help manage growing congestion in current use and to ensure that the cost of denying access to this spectrum by potential alternative applications is faced by current users?:

This is a 'congestion charge' for vessels and aircraft, and will not solve the percieved conjection. It will simply drive the users 'underground', I predict that you will find non-radio G.A. aircraft wandering through busy airspace such as Heathrow more often than happens now, without a transponder. The Police will be too preoccupied to chase any offending aircraft to prosecute, and Ofcom will have to provide an army of investigators to deal with the myriad of incidents which will take place, so your profits will be soaked up in salaries for these 'Radio Bailiffs'.

Question 8: Do you agree with our initial view that it would be appropriate to apply a pricing system similar to that already existing for Business Radio licences to maritime and aeronautical VHF communications? If not, what are your reasons for proposing that we should develop a fee structure for maritime and aeronautical VHF channels which is distinct from that already established for Business Radio?:

No.

Business radio is usually for the enhancement of a particular business. Maritime and Aviation radio is a vital safety feature of those industries, and cannot be compromised.

People like me won't let that happen.

Question 9: Are there any short term reasons specific to the sector(s) why it would be inappropriate to apply fees from April 2009?:

Safety standards cannot be maintained at their current level if these charges are imposed.

Question 10: Ofcom would welcome stakeholders' views on the factors which should be taken into account when apportioning fees between individual users of radars and racons:

As already stated there should be no charges imposed. Therefore this question is an irrelevance.

Question 11: Do you agree with our initial view that a reference rate of £126k per 1 MHz of national spectrum for L band and S band radar spectrum would achieve an appropriate balance between providing incentives to ensure efficient use of spectrum while guarding against the risks of regulatory failure in setting the reference rate too high? If you consider a different rate would be more appropriate, please provide any evidence that you think we should take into account.:

No . . see above.

Question 12: Do you agree with our initial view that a reference rate of £25k per single MHz of national spectrum would be appropriate for deriving fees for licences to use X band radar?:

No . . see above.

Question 13: Do you agree that, generally, spectrum used by aeronautical radionavigation aids is currently uncongested? Do you believe that this may change during the next few years and, if so, approximately when?:

I agree that there is congestion especially where VOR's are concerned. It would make more sense to upgrade these systems to SSB, and increase the capacity of the systems.

I believe that GPS will replace the ground based systems currently used across the complete spectrum of aviation. I cannot comment about the maritime radio systems.

Question 14: Do you agree with the basis on which Ofcom has arrived at its initial view on reference rates for aeronautical radionavigation aids?:

No.

This is a typical view taken by a Government based quango which has failed to see a problem as it was occurring, and has come up with a 'hit 'em in the wallet' strategy to resolving it.

Not only is it half baked, it is half witted, and whoever came up with this idea should be made to answer questions from users of the systems in a public debate.

Comments: