

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?:

Value and take action on all responses from emergency services- especially those of a voluntary nature who may not have a route to communicate through 'usual' methods. Land Search and rescue is wholly dependent on the pro-active support of the voluntary sector. (Police, Ambulance and Fire and Rescue Services are not able to climb up mountains, as I am sure the RNLI will confirm they are no good at sea.

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.?:

Voluntary Search and Rescuers are mainly reliant upon private donations to function. If a substantial amount of these funds are required for spectrum then other aspects of the service will suffer. Perhaps small units may not be able to function. This would be detrimental for the general public. Many Search and Rescue Organisations are now utilized to search for lost children, elderly or mentally ill persons. If communication between searchers is inadequate then safety of the searchers and efficiency of the search would be affected.

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

Outside my knowledge/experience

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:

See my response to Question 2. If voluntary organisations cannot afford to pay for this perhaps the Police Service would have to pay and perhaps reference should be made to ACPO with regards to this.

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:

Outside my knowledge/experience

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:

Not discounted but provided free of charge.

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?:

Outside my knowledge/experience

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?:

A pricing system for business use should be different from that used by the voluntary sector, who have no function monetary gain and therefore unable to find a route to cover this additional cost.

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

Yes. Voluntary organisations need to know in advance of any substantial costs being imposed upon them so they can budget for these accordingly and identify a way of raising more money to cover the cost, before they receive demands for payment.

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:

Outside my knowledge/experience

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.:

Disagree for Voluntary Search and Rescue Services. Nil charge should apply

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?:

Disagree for Voluntary Search and Rescue Services. Nil charge should apply

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?:

Outside my knowledge/experience

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

Outside my knowledge/experience

Comments:

Thank you for this opportunity to contribute. Please consider Voluntary Emergency Search and Rescue services as an exception to financial charge.