

**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?:**

**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.?:**

Any pricing for airfield operators, especially in the current financial climate will likely lead to some aerodromes reducing the numbers of frequencies they use (e.g. ATIS) or removing them altogether and becoming non-radio. As a GA pilot having a good ground to air radio service is invaluable as a way of understanding the conditions at the destination aerodrome and maintaining separation and flying safely.

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

In the Aviation spectrum I understand that frequencies cannot be reallocated for any purpose because of international agreements. If frequencies remain unallocated in this band they will have to be returned to the international community so no gain to UK then. What then is the point of arguing there is a competitive value in the frequencies? There is not.

**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 answer to question 2 for the likely outcome of any charging for this. Fewer aerodromes operating with a radio, more chance of danger to pilots.

**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:**

Agreed

**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:**

If the discount is for those that have as their objective "the safety of human life" then this surely supports the free use of radio in the aviation spectrum - airfields make no money from them but they do contribute to the safety of human life.

**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?:**

My understanding is that you cannot reallocate Aviation spectrum because of international treaties, and how could, say an alternative user, suddenly start transmitting in the aircraft waveband. What would they transmit?

**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. My argument is that you should not pursue charging in the aircraft waveband, or any charges are at worst nominal.

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

**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 radars:**

Any reduction in the already limited radar services open to GA and others in this country - as any charging will be bound to reduce it - will further erode safety margins.

**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.:**

**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?:**

**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?:**

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

**Comments:**

I really do urge you to reconsider your proposal. Saying that there is a competitive advantage attached to the aviation spectrum is seriously flawed.