

**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?:**

All UK maritime professional and leisure organisations should be given the opportunity to comment. Since the majority of people with an interest in the sea round the UK are amateurs, strenuous efforts must be made to make all aware of this consultation. All sailing, boating and rowing clubs must be circularised and given plenty of time to respond.

**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.?:**

It is self-evident that additional costs have an effect on charities and clubs associated with operating safety on the sea. The costs suggested for the RNLI equate to the fund raising efforts of around 50 ordinary local groups. Why should they have to slave away to provide funds which are to be diverted to the government? Non-profit organisations associated with safety, search and rescue should be exempt from all taxes direct or indirect. With the current proposals, some organisations will cut back or disappear and the safety and security of people on or by the sea will be compromised.

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

This is a daft question. The competitiveness of the UK has nothing to do with people enjoying themselves safely on or by the sea. The urge by governments and quangos to control and charge the rest of us must be resisted. That is the thing which makes this country less and less a "pleasant land". Leave us and the charitable organisations and the sailing clubs alone.

**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:**

I am not in a position to give you the facts. Talk to the RNLI, the other maritime rescue organisations and mountain rescue teams.

**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:**

No knowledge or views

**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:**

Charities and clubs must be exempted.

**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?:**

Spectrum congestion is surely irrelevant when the marine channels are internationally agreed. Surely the UK cannot make unilateral decisions about changing their use.

**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?:**

If we are talking about non-business users, then we are talking about amateur and pleasure use. If you slap heavy charges on, then the less well-off people and organisations will have to stop using those services, to the detriment of their safety.

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

Because most people, myself included, do not know about the proposals and therefore have no opportunity to influence them. The timescale for consultation is far too short.

**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:**

Again, you are attacking the ordinary persons use of safety equipment. Shame on you.

**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.:**

If you are suggesting that each vessel with a radar should pay then you have left the real world.

**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?:**

See Q11.

**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?:**

No knowledge of this

**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 knowledge.

**Comments:**