

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?:

The views of the Emergency and SAR services should be paramount in this process. Given their life saving/preservation roles, their needs should be considered above that of commercial organisations.

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.?:

The use of radio systems, free of interference is vital for the safety of SAR members, and casualties. If voluntary/charitable SAR services such as Mountain Rescue and the RNLI are unable to afford the channels currently available, this could lead to interference and saturation of the channels. During a major incident, or indeed when multiple incidents are taking place, this would have a detrimental effect on the safety of SAR members, and as a result, the health and safety of the public/casualties.

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

There are other channels, which are underutilized at the moment, which should be made available before those in the SAR band are considered.

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:

SAR activities, both on Land and at Sea, within the UK currently depend significantly on the services provided by charities such as Mountain Rescue teams and the RNLI. Given the current financial climate, these charities are finding it increasingly difficult to raise the money needed to operate. Should the licence fees increase, then these organisations be forced to cut back on the purchasing of other, sometimes lifesaving, equipment.

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

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 charge for SAR organisations, particularly those that are charities. Maybe a slight increase in the fees paid by commercial organisations could cover the fees of the SAR channels.

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?:

SAR channels are only used if and when it is necessary, often when life is in danger. SAR organisations are trained in the efficient use of these channels. There should be no charge to SAR organisations involved in the protection or preservation of life.

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?:

There should be no charge for use of the SAR spectrum for lifesaving activities. If a charge is needed, then it should only be on the part of the spectrum used by the commercial sector, for financial gain.

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

SAR organisations have invested considerable time in training for the current band plan. Should fees be increased significantly then it is possible that the current band plan may need to be amended if teams are unable to afford the current allocation. There should be no charge for SAR organisations.

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:

There should be no made to SAR organisations involved in using these devices for life saving activities.

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.:

There should be no charge for use of the SAR spectrum, only that used for commercial gain

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?:

Only for those using the spectrum for financial gain. There should be no charge for SAR activities.

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?:

We have no experience of aeronautical navigational aids, and are therefore unable to answer this question

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

We have no experience of aeronautical navigational aids, and are therefore unable to answer this question

Comments:

SAR organisations respond to incidents when there is a risk to life. These incidents often take place in poor weather or in dangerous conditions. If charges are increased these organisations may not be able to afford the frequencies currently in use. This would have serious implications for the health and safety of SAR team members, resulting in us providing a less efficient service. This would have a detrimental effect on casualty care, and would put lives (both casualty and SAR members) lives at risk