

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?:

Voluntary Search and Rescue teams (SARs) should have priority in this process. They save lives on a purely voluntary basis and their needs are more important than any commercial organisation.

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 SARs need their communications to ensure the safety and well being of their people and the people they rescue. If they didn't have these they couldn't do their job. Worse still, if they had to share then interference would be a real problem, endangering everyone.

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

As far as I am aware, there are a huge number of channels in the UK that are not fully utilised

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:

SARs and people like the RNLI do fund raising to be able to purchase vital equipment they need. They don't get money from the government or the police so every penny is vital. To have to pay for radio channels as well is wholly unacceptable and will put a great strain on their meagre resources. They might even have to make a choice between radios or other equipment which could have dire consequences for their people and those they rescue.

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:

Definitely, there should be a full discount for voluntary life-saving teams. They must also retain the channels they have.

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?:

Ofcom should not charge for channels that are used for life-saving activities.

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?:

Ofcom should only charge for the channels used by commercial organisations.

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

Only to say again that Ofcom should not charge for channels used by voluntary life-saving 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:

Don't really know about the individual users of radars and racons, but where distress Sarsat EPIRB or plb beacons are used, there should be no charges levied on SARs for these life saving devices.

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.:

Don't care what rate you charge as long as you only charge commercial organisations.

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?:

Not if the channels are used for life-savng 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?:

don't know the current level of congestion

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

don't know about aeronautical radionavigation aids.

Comments:

The safety and preservation of human life must come first. Charging voluntary SARs or reducing their channels will seriously impact on their ability to save lives.