

SPECTRUM CHARGING - GAPAN

General Observations:

OFCOM has declared that it is not minded to charge fees to aircraft (Summary paragraph 1.18). It is, however, proposing to levy fees through administered incentive pricing (AIP) and subsequent trading on ground-based organisations that will require spectrum access in order that they may function. It is inevitable that such organisations, where they provide a safety-related service to aircraft, will seek to recover such costs from the owners and operators of those aircraft. At the least, this will mean that less money will be available to the latter to spend upon maintaining an appropriate level of safety.

Safety in flight operations will be affected adversely where such ground-based organisations as will be required to pay spectrum charges decide to reduce the scope of communications and navigation aids that they currently make available for use by the aviation community, especially where the additional costs these organisations will incur may not be fully recoverable. Whilst this may have the superficial appearance of ‘increased efficiency’, it will undoubtedly increase the difficulty pilots experience when attempting to make position reports (more clutter on such communication channels as remain), seeking information (potential decommissioning of volmet and information channels whose purpose is to provide weather and aerodrome status reports) and maintaining positional awareness (removal of ground-based aids commonly used as a disparate source of information to confirm on-board positional information derived from satellite-based navigation systems) including especially the avoidance of collision with terrain and separation from other aircraft.

Operational flight safety has never been dependent solely upon meeting minimum standards prescribed by authorities, but upon maintaining sensible margins that protect practitioners from minor shortfalls in performance – both human and technical. Thus, the possible widespread removal on cost grounds of many aeronautical channels of communication and apparently non-essential ground-based navigation aids in the United Kingdom may erode those essential safety margins that private and professional pilots rely upon to help them avoid incidents and accidents.

Q. 1 You must prove that there would be no effect on safety as a result of your proposals. Thus a safety review shall first be conducted by the responsible authority and you shall be obliged to abide by its findings.

Q.2 If elements of the aeronautical and maritime frequencies are auctioned, there is every likelihood that the costs will be passed on to those who have no option but to use radio communications for flight or maritime safety.

Your proposal puts an unacceptable price on safety; it is quite unacceptable to compare aeronautical and maritime radio to business radio.

Q.3 If airlines are obliged to pay more to use VHF communications within UK airspace, it will be inevitable that they may move their operations to more reasonable EU Member States.

Q.4 You should not expect to charge for safety.

Q.5 Economic efficiency is utterly irrelevant in this context.

Q.6 There should be no AIP or any other charges beyond those existing now.

Q.7 No.

Q.8 No. Business Radio is for convenience and efficiency, whereas aeronautical and maritime radio is entirely for safety.

Q.9 This absurdly short timescale would give insufficient time to conduct a proper Safety Review and Impact Assessment.

Q.10 This is a statement, not a question.

Q.11 No.

Q.12 No.

Q.13 Certain frequencies are often congested, others relatively quiet. The use of data links may reduce voice RT requirements, but more efficient frequency planning (as has been proved in Germany) would improve congestion levels and negate the need to extend 8.33 KHz channelling requirements.

Q.14 No.

Conclusion The Guild believes that Ofcom should not have considered selling off safety to the highest bidder. Aeronautical and maritime frequencies are necessary for the safety of life - in no way whatsoever are they comparable with Business Radio or PMR – they should be removed from the spectrum pricing policy.

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