

# GENERAL AVIATION ALLIANCE

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Partnership in Aviation

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26 October 2008

Dear Sir

## **Applying Spectrum Pricing to the Maritime and Aeronautical Sectors**

We refer to your consultation in respect of this matter and request that you add the General Aviation Alliance (GAA) as a respondent with the same basic content as that submitted by The Light Aircraft Association.

We are not submitting a separate response as our combined views are very similar but we do wish you to be aware of the seriousness with which our member associations view this proposal.

### Background to the GAA:

The General Aviation Alliance (GAA) is an independent grouping and partnership of organisations which individually promote the interests of General Aviation (GA) and particularly Sports and Recreational Aviation (S&RA) in the United Kingdom. Its objective is to co-operate and consult with government departments and other relevant organisations and bodies on regulatory and directly related matters to support and progress the best interests of their individual members in the enjoyment and promotion of that activity.

There are some 70,000 individual members within the associations noted below.

### Member associations of the GAA:

British Balloon and Airship Club (BBAC)  
British Hang Gliding and Paragliding Association (BHPA)  
British Parachute Association (BPA)  
British Gliding Association (BGA)  
British Microlight Aircraft Association (BMAA)

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*British Balloon and Airship Club  
British Gliding Association  
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*British Parachute Association  
Royal Aero Club of the United Kingdom  
Helicopter Club of Great Britain  
Light Aircraft Association  
European Association of Instrument Rated Pilots*

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Light Aircraft Association (LAA)  
Helicopter Club of Great Britain (HCGB)  
PPL/IR Europe – European Association of Instrument Rated Private Pilots  
Royal Aero Club of the UK (RAeC)

In particular our members unanimously find it quite astounding that you should decide to proceed with the introduction of these charges when Government has acknowledged that the UK is now in recession. We do not find your suggestion persuasive that, having set the charges, they might be deferred for a period. The certain knowledge that costs will increase at a time when the recession may have bottomed will kill any planning for growth and in the short term, yet more businesses will close. Whilst you have a responsibility to Government to impose charges to be remitted to the Treasury, we expect you to take a higher level view of the state of UK business.

We also doubt that what you propose is within your remit because the internationally regulated nature of the aeronautical spectrum prevents UK users from influencing efficiency and change. Your choosing to make an assumption that excludes the realities of this spectrum and which flies in the face of the Government's expert advice is not credible and you should review your approach to this before the next stage. We trust and expect that if you do decide to proceed, a full impact assessment will be produced and that it will be based on the reality of the spectrum and not the artificial situation you set out in this consultation.

Please acknowledge receipt of this letter and that you will treat it as a formal response to the consultation.

Yours faithfully

A handwritten signature in dark ink, reading "Roger Hopkinson". The signature is written in a cursive, flowing style with a large initial 'R'.

Roger Hopkinson  
GAA Facilitator