

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?:

There is a need to make sure that Charities involved in Search and Rescue such as the RNLI are treated as special cases which do not involve full pricing. Ofcom should bear in mind the source of the charities money. New arrangements should be made with Institutions for fair pricing with reference to what they do and make life saving institutions free or have large discounted prices.

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 proposal would certainly reduce funding available on essential RNLI lifesaving equipment and thus place at risk the RNLIs' ability to save lives at sea and around our coasts. This would obviously have a detrimental impact on the operational efficiency of Crews, and Lifeboats.

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

No

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:

The impact of the fees would reduce funding on essential equipment.

Would cause unnecessary stress to operational crew members out on a lifesaving operation that they cause any ship to shore messages to be kept to a minimum - thus certain important messages may fail to be transmitted, the failure of which could result in loss of life of either casualties or crew.

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:

YES discount or waive fees to any Charity whose object is the safety of human life in an emergency.

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?:

Commercial rates should not be linked in any way to charitable rates. Congestion should be controlled but not by increased pricing.

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?:

No. The pricing could deter pleasure boaters and flyers from carrying the necessary radio equipment and result in unnecessary loss of life as a result.

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

Current financial problems in the UK is already causing a lack of charitable funding, any such application of fees should they be approved should only be applied once financial problems are relieved.

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:

Factors concerning safety of life both at sea and in the air should receive priority and benefit from any discounted fees.

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.:

This should not be applied to Charities whose object is the safety of human life in an emergency and special reduced rates should apply.

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?:

This should not be applied to Charities whose object is the safety of human life in an emergency and special reduced rates should apply.

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 comment as no knowledge of conditions.

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. I feel that not enough consideration has been given to the use of such equipment by national Lifesaving agencies and Charities.

Comments:

Please make Lifesaving Charities and SAR units special cases with either waived or heavily discounted fees. Their duties do not need to be impeded by worries on how little they must use ship to shore facilities.