

- Q1 Ofcom should use the CAA/DAP list of Consultees to ensure that all aviation bodies/interested parties have been included.
- Q2 It is hard to recognise that the opportunity costs of other users might be given that aeronautical frequencies are protected in the ITU Regulations. Safety could be compromised if smaller aerodromes operators believe that the proposed charge (£4,950) is disproportionate to their operations – aircraft operators would have to revert to a system of ground based signals in order to determine wind and landing directions. Pilots develop a mental picture of other traffic in the air by listening to the radio.
- Q3 Regarding competitiveness – the lack of a radio facility at any aerodrome may mean that these aerodromes lack the ability to attract foreign visitors/businessmen and, ultimately, slow down any regional development.
- Q4 The main issue we have relates to business planning and budgets – many small aerodromes are unlikely to have included the proposed Ofcom fee in next year's financial planning – more lead in time is needed.
- Q5 Yes, we agree.
- Q6 Yes, discounts should exist for frequencies used by the air ambulance service or any other safety of life service.
- Q7 No, we do not agree that Ofcom should apply AIP to aeronautical VHF Channels because they are protected by international rules and are not therefore currently available to “other users”.
- Q8 Again, we do not agree that pricing should be based on the existing Business Radio Licences – we do not understand the logic.
- Q9 As we have already stated in our response to Q4, business plans and budgets will not have taken the Ofcom proposed charges into account.
- Q10 to Q14 This is subject to future Workshop/Consultations and debate so we shall provide answers to the questions relating to radar etc at the next opportunity.

Thank you for including the Aircraft Owners and Pilots Association in your Consultation.

AOPA represents the views of 18,000 active aircraft owners and pilots in the UK.