

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?:

It should listen and respond. It would be good if it did not "ask and ignore" (the usual way these things are done by Government bodies with pre-judged decisions).

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.?:

There are fundamental flaws in the logic of this proposal.

First, the aeronautical spectrum is governed by international agreement, so slices cannot be pared off and sold to the highest bidder without breaching those international agreements and causing major disruption to safety.

Second, the aeronautical industry sectors (airlines and manufacturers) are already in a precarious financial state. Adding a further tax burden will cripple them further. The result will be that they will either go under, or reduce their use of essential radio safety equipment.

I could see, for example, the use of radar altimeters being reduced, with a resultant increase in CFIT (Controlled Flight Into Terrain) accidents. Of course, OfCom would blame the pilots. The pilots will blame OfCom for pricing the RadAlt out of their aircraft.

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

UK competitiveness isn't the issue. Safety is the main, almost the only reason for aircraft radio. The proposal is to charge for this safety, hence making safety more expensive.

Yes, it will also reduce UK competitiveness. The UK's airfield infrastructure is already seriously uncompetitive, with many major cities without easy access from long distances (think Ipswich, for example). The more airports are closed because they cannot pay their way, the more the UK will lose out in the global competitiveness arena.

Short-sighted Government planning policy, which treats airfields as "brownfield sites" for development, even if they are largely green grass areas, is in large measure to blame.

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:

I don't have the numbers - hopefully you do, or will get them from a reliable source. However, the more you charge, the less radio will be used. The Government's profit through increased tax take will be at the direct disadvantage of the people it once was elected to serve.

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:

More than that. It will be a positive disbenefit.

The only benefit will be the Government's tax take. "Economic efficiency" is totally irrelevant, since international frequency allocations preclude reallocation of the spectrum being "charged for".

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:

There should be no fees, period.

If there are, then the emergency charities should be exempt, although I don't see how that will work if the airfield radio services have already disappeared because they cannot afford the extra tax.

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?:

No.

"Growing congestion in current use" is bureaucratic babble. There is no growing congestion other than the increase in the number of aircraft flying, and that is being handled already by more-efficient use of the spectrum - for example, 8.33kHz channelling.

Pricing users off the air is not the answer. It's a badly-conceived bureaucratic approach to a practical subject and will have totally deleterious effects.

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.

There should not be a fee structure at all.

This is internationally-organised spectrum, for the use of all aircraft from all countries, overflying or landing in the UK.

"Business radio" is optional - companies can decide to use, or not use, radio and the charge for the spectrum they wish to rent is part of the decision process. Aviation does not have this option.

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

The same as the long-term reasons: it makes no sense whatever.

However, in the present economic downturn the imposition of further taxes on aviation is likely to cause yet more failures and more "gaps" in the UK's air transport infrastructure.

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:

If you charge for radar, more users will stop using it.

More people will die in air accidents.

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.:

No. That is totally over the top.

If you are given the task, by Government, to extract more tax, then say so and drop the pretence.

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?:

No.

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?:

It is "managed". Interference between Nav aids on the same frequency is minimal.

There is no reason to expect it to get worse. The use of GPS will preclude the need for more VOR and DME installations, and ADF is a prehistoric aid that will soon become extinct. That will free up the spectrum between 200kHz and 500kHz, not that much else uses it any more.

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. It shows a total lack of understanding of the aeronautical spectrum, its allocation, and use.

Comments: