

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?:

Voluntary life saving organisations such as mountain rescue and search dog teams should be consulted as a priority.

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.?:

Potentially devastating! Reducing available channels and limiting the essential communication available to different Search and Rescue teams could put the lives of casualties as well as team members at risk.

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

I understand that many channels are not completely utilised.

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:

All funds raised by Mountain Rescue and Search Dog teams have taken a great deal of personal time and energy to collect. Most of us work in full time jobs, we get called out at all times of day and night, usually in atrocious conditions to save lives, and then our weekends are often taken up with fund raising.

I feel that the suggestion of introducing fees to voluntary organisations such as ours is immoral.

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:

Definatly, 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:

I feel that it would be irresponsible not to give all Mountain Rescue and Seach Dog teams a full discount on fees.

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?:

As long as these channels are not used by MR and SARDA teams.

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?:

Yes, but only where financial gain is made.

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

No charges should be made to voluntary life saving organisations.

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:

We do not usually use these methods, but in the event that they are employed, I feel that voluntary life saving organisations should not be charged.

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.:

Yes, but only for profit making organisations.

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?:

Not for voluntary life saving organisations.

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?:

I do not have an opinion as this is not applicable to Search and Rescue.

Question 14: Do you agree with the basis on which Ofcom has arrived at its initial view on reference rates for aeronautical radionavigation aids?:

I do not have an opinion as this is not applicable to Search and Rescue.

Comments:

The charging of Mountain Rescue and Search Dogs teams for radio usage will further stretch very limited resources. There is no doubt in my mind that it will put the lives of both casualties and voluntary rescue team members at risk and this is unacceptable.