

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?:

Publish a contact address in local newspapers. Make the consultation known to local bodies such as Mountain Rescue, RNLI etc, so that a response may be made.

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.?:

In a small community where fund-raising is a constant strain, the proposed rise in the cost of spectrum use threatens the viability of life-saving charities. On Arran, our rescue organisations, staffed by volunteers, have saved many lives both on the hills and at sea. If they cannot afford to renew the licence for their vital radio contact, there will undoubtedly be increased risk of injury and loss of life.

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. I regard this question as secondary to the prime aim of providing an effective means of providing response to emergencies.

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:

Arran Mountain Rescue and the First Responder team who get quickly to cases of cardiac arrest are staffed entirely by volunteers, and depend wholly on good radiocommunications in order to function. In a mountainous area with widespread blank areas where no mobile phone signal exists, the dependence on radio is critical.

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, I think charitable rescue organisations should be exempt entirely from any rise in the licence fee. In particular, RNLI, Mountain Rescue groups and medical emergency groups must not be threatened by fees that they cannot afford.

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?:

I doubt that control by price is an effective or morally acceptable means of controlling demand. So, no, I do not agree with your proposition.

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?:

Maritime and aeronautical channels cannot be regarded simply as another form of Business Radio. There is a radical difference between most businesses and the inherently risky undertakings of sea and air travel.

Your fee structure should be based on an acceptance that the safeguarding of human life belongs in a different category from enterprises that focus on making profit in ways that are not by their essential nature potentially dangerous.

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

Yes. The proposed heavy increase may well be impossible for voluntary groups to raise in 6 months, with resulting danger to their continuance. They already fund-raise constantly to continue their very existence, and in the present volatile economic climate, there is little slack in local economies.

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:

Again, consideration should be given to which users provide a life-saving service.

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.:

I have no means of assessing the overall rate, not possessing any of the relevant statistics.

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 in all cases

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?:

Probably.

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.

Comments:

I would like you to show some sign that you do actually want to consult on these matters. At present, you do not make it easy, and this increases an unfortunate public perception of Ofcom as deeply uncommunicative.