

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?:

The consultation is a good start to the management process. It would be better if the questions were in plain english not civil service quango gobbledegook. There is a presumption that it is necessary to charge that appears to be self-justifying the existence of Ofcom.

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.?:

For volunteer emergency services that is exactly the problem. As a mountain rescue team we are always low on funds and that funding is shortly to be cut further. Your proposed "apportionment" is more than our annual budget. That means we could not afford to use radio communication on call-outs.

In turn, that means the we as individuals and those we rescue are at greater risk. We could not, for example direct each other to an accident site once a casualty had been found. Neither could we summon more help without returning to somewhere with a land-line. That puts mountain rescue back by about 50 years.

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, We are not a commercial organisation

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 would close us down as an effective mountain rescue team. That would leave the entire north of Scotland dependant on the RAF Teams.

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:

No. Your suggestion that you should charge charities involved in saving lives, but not people who can afford their own aircraft is, frankly, disgusting.

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, but not a discount. It should be for free. Otherwise this is just a tax on the money people donate to us. That is also disgusting. Perhaps your CEO should debate this in public and see how grasping it looks?

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?:

Yes. You should manage the congestion. And yes profit making users should probably be charged. To my mind that would include commercial user who need to make emergency calls.

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 Opinion, we are not a commercial organisation.

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

We have no opinion.

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 have no opinion on apportionment, other than that as a charity that saves lives we should not pay anything

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.:

We have no opinion of the specifics of how you charge as long as you only charge commercial organisations not charities.

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?:

As question 10 above

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?:

We have no opinion on the above. Our interest in channels is currently confined to the Maritime band

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

As question 13 above

Comments:

Be prepared for a storm of protest if you dare to charge us. Although bound together by a loose national structure Mountain Rescue Teams are highly respected for what they do and their beliefs in a free service to casualties.

I am sure we could field a number of our national officers if you wanted to debate your position, say, on the radio- on any band of your choosing, so long as you are paying not us.