

**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?:**

Mountain Rescue Teams and other Emergency Service agencies should have priority in this process. The needs and views of these life-saving emergency response organisations, which are charitable and not-for-profit units, should take due precedence over those of commercial sector.

**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.?:**

The safety and well-being of both the casualties and members organisations such as Mountain Rescue Teams would be put at risk. If Mountain Rescue Teams had the number of channels reduced or were forced to share with other agencies, this is likely to result in saturation and a dangerous increase in co-channel interference. During multiple or major incidents, which often carry the highest risks and often involve more casualties and Team Members, then the vital communications could become unworkable which could have exceptionally serious consequences.

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

Yes, there are a large number of channels that are not being fully utilised within the UK. This can be found using Spectrum Analysis.

**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:**

Mountain Rescue and other rescue organisations need to retain all the money they have raised via donations and the time and painstaking effort taken for fund-raising to fulfill the life-saving activities they perform. It is no exaggeration to say that many lives will be put at risk if the cost of the license goes up, voluntary SAR agencies have to contribute, or SAR channels removed. It immoral to charge those persons who are fulfilling a humanitarian role and are already over-stretched because of increasing casualty rates, new legislation. It must be emphasised that the government currently gives NO funding whatsoever to voluntary rescue organisations, yet they are so

dependant on them in times of emergency.

**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, a full discount for all volunteer life saving organisations. It is vital that the existing SAR channels are retained to allow continuing provision of an effective SAR function.

**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

**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 for that spectrum which is used for commercial gain, not those used by SAR organisations.

**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 for channels that are specifically used for Search and Rescue operations.

**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:**

No charges should be brought against voluntary SAR agencies for these life-saving devices.

**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.:**

Only for that spectrum which is used for commercial gain.

**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 if the spectrum is used for life-saving activities.

**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 believe it is congested.

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

**Comments:**

Life will be put at serious risk if organisations such as Mountain Rescue and RNLI are forced to pay for frequencies. The safety of life should be put before money and charges.