

**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?:**

Care should be taken so that there is no impact on safety related volunteer organisations. In particular the nations volunteer mountain rescue services are all charity funded and personneled by volunteers. There is no monetary gain involved for any one in these teams.

**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.?:**

Mountain rescue teams work in environments where radio communications are paramount and an indendent radio system owned and operated by the teams is an essential rescue aid. In many of the remote locations this is the only form of reliable communication. As these are all charity based volunteer organisations any impact on their fundrasing will have a detrimental impact to safety.

**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

**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 services are already burdenned with high cost rexcue equipment of a type that is considered consumable. High value assets such as radio equipement is valuable and looked after but the budgetary requirements of additional spectrum fees would seriously impact the on the purchase of ongoing consumable equipment.

**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 absolutely

**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?:**

With due regard to the nature of current (and possible future) usage of the spectrum by life saving, humanitarian voluntary organisations

**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?:**

The nature of many users currently occupying these bands are that they will have difficulty paying additional fees due to their charity status and the already high cost of equipment that they need to provide life saving services in the mountains.

**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 nature of the proposed changes are not well understood or promulgated to the current user groups in the mountain rescue community who may, not unreasonably, be aware of what must appear to most as an esoteric area of interest to them. There needs to be a clear message sent to these groups detailing the severe impact of the proposed changes on their operating efficiency.

**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:**

n/a

**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

**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?:**

yes

**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?:**

no

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

yes

**Comments:**