

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?:

No institutional arrangements need to be made because this charging is just a government money grab and another stealth tax on the safe navigation of aircraft and ships and should not be implemented.

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 the aviation sector this would have two effects both on safety critical phases of flight.

For small airfields the non-mandatory services would be withdrawn due to cost, this would stop pilots reporting aircraft locations and intentions, this is critical to avoid collisions.

At larger airfields it would discourage the use of an ATIS (loop recorded airfield data broadcast) this would increase air traffic controller and pilot workload and distract them from their primary tasks

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

You would be stupid to think otherwise! The UK industry would have to pick up the bill for this safety tax, UK aviation suffers more tax than any of foreign competitors, this is just another example of government money grabbing that the foreign competition won't have to suffer

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:

It is simple light aviation can't afford to pay these ridiculous fees and so will withdraw the safety related services,

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 comment

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:

What a ridiculous statement, these changes will make aviation and shipping much more dangerous and you offer discounts for the emergency services and RNLI to clear up that mess that your safety tax has created. Time to re think this I suggest.

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 to suggest that you can "manage the spectrum" with these charges is false, International agreements have allocated the aviation and maritime radio frequency's and you simply cant go selling off part of the aviation or maritime radio band to another user due to the interference that this might cause to a safety related application in a nearby state

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! the safety related radio spectrum is in place to enable the safe navigation of ships and aircraft and should not be taxed.

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 whole concept of charging for safety related radio spectrum is immoral and very unwise for the good of UK PLC.

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:

Radar is a vital safety aid for ships and aircraft and should not be taxed.

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.:

no comment

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?:

no comment

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 however the VHF aeronautical band may become less used with the introduction of more satellite navigation systems, however I don't see this changing for the next twenty years or so.

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:

This is the most unashamed and callose attempt at taxing vital safety related radio bands that I have ever seen. It is a lie that you are trying to control the radio spectrum because you cant eat into the aeronautical and maritime spectrum without international agreement. This is all simply a money grab my the government and a chance for a bit of empire building at the radiocommunications agency. Most other governments see this part of the radio spectrum as an essential public service for all to use, only in the UK do we have people so immoral as to tax public safety.