

**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?:**

I would hope that, Search & Rescue and Emergency Services are given a priority in this process, the commercial sector should come in second place, with respect to asking advice on how the proposal should be addressed.

**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 first and obvious impact will be on the casualty & also the SAR members well being. We moved to these channels in 2004 and before then we had 2 86MHz channels to use across the whole UK. In my Teams area we have 7 other Teams across four regions with whom we would bleed over and cause co-channel interference to their operations & training. After changing to these VHF HiBand channels we have not interfered or been interfered with by any other Team or Region, whilst on a Rescue or on Training. If we are to pay for our channels then we simply cannot afford the number available to us now and would have to take backward steps in terms of interference, technology and the possibility of affecting the safety of those who need us and members.

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

I have no knowledge on this matter, but surely there are other frequencies which are not being fully utilized ?

**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:**

All funds for Mountain Rescue (England & Wales) teams comes from direct fundraising to the Great British public. Everything we have is paid for by fundraising, we may be lucky to get left money in a Will, but 99% of the time it is through rattling a tin on a street. We are - including the RNLI - the only 999 service that the membership pays to be part of, if that be time taken out of work to save a life, training, fundraising.

I am sure that many smaller and not so rich MRTs would not be able to provide the service which they currently give, if the pricing structure proposed came into play and they may have to disband.

**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, all organisations that provide a life saving function should be EXEMPT from any licence fee, especially if that organisation is one which is a Charity and funded by public donations.

Please do not change the way this current excellent use of these radio frequencies are now used.

**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 providing that the use of such is not for life saving functions & 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?:**

I do agree, but again, providing that this pricing is applied to those whom use it for commercial gain and not for those who use it for life saving activities.

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

One I can think of is - can the volunteer life saving organisations raise the required amount for their licences by that time. Figures I have seen quoted are far more than some teams can raise in one year.

Again I must object to any charges levied on those who provide a life saving function and suggest that you do not charge for the national and international frequencies used for Search & Rescue charities.

**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:**

I personally can not answer this as I am not a stakeholder in either.

**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 but as my answer in Question 8 - only for that part of the spectrum used for Commercial gain and not for those whom use it for lifesaving activities.

**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 but as my answer in Question 8 - only for that part of the spectrum used for Commercial gain and not for those whom use it for lifesaving 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 have no knowledge in this field, but surely history shows that if it is uncongested now - with all the increase in technology - it may remain uncongested in the future ?

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

I have no knowledge of this field.

**Comments:**

The existence of MRTs will be severely affected by any additional fees levied on them for use of the radio spectrum. Also the preservation of life will be directly affected by any additional funding that voluntary SAR agencies have to find, some of

us struggle now without having to find additional funding.

At the end of the day, the safety of human life is paramount, the pricing of such licences for voluntary Search & Rescue organisations is not.