

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 is a charity and commercial considerations should not take priority on matters that have a lifesaving implication.

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 rely on speed of reaction especially during technical rescues. Any reduction in channels or having to share channels would have a dangerous detrimental effect particularly in incidents where there are multiple casualties. Mountain Rescue already have communication problems in difficult terrain, having to use repeater stations to maintain communications a reduction in readily available channels would exacerbate the problem.

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

My understanding is that there are many other underutilised channels available in UK without encroaching on Mountain Rescue channels.

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:

Money to maintain the existence of Mountain Rescue teams comes from hard worked fundraising teams. Money so raised is necessary to meet the increased demand of casualties, equipment to meet minimum standards of Health and Safety. The general public who in the main provide the bulk of this money, expect that the money is used to promote the humanitarian role of Mountain Rescue not to see it used for non lifesaving purposes.

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, Mountain Rescue and similar voluntary lifesaving organisations. I believe that rather than discount fees, no fees should be charged to voluntary lifesaving organisations.

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?:

The use of SAR channels should be efficient. Other channels, not used for SAR could have AIP applied.

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?:

Pricing systems should be applied where commercial gain is involved

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 used for search and rescue.

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:

If radars or beacons are integral to lifesaving agencies then those users should not be charged

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 when used for commercial purposes.

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 used for Mountain Rescue and similar organisations

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?:

?

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:

MR's prime function is to save life, minimise pain and suffering and to ensure the safety of its members. Any increase in costs is likely to result in decreased standards because money has to be channeled away from the safety and rescue aspects of the work which will put lives at risk.