

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?:

Whilst I understand the need to increase Government Revenue, it must not be at the expense of the work carried out by voluntary organisations, particularly those whose role is one of saving life such as Mountain Rescue teams and associated organisations. Commercial considerations have no place in such deliberations.

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.?:

Any introduction of pricing for the use of vital radio communications intended for the safe search and rescue of those in need or in danger, by voluntary groups, will inevitably lead to reduction in use, possibly compromising the safety of rescuers as well as casualties / missing persons. Does each member with a radio constitute a ground station? Each repeater station? These implications do not appear to have been thought through!

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

Commercial competitiveness is not and must not become the solely important factor. The fact that so much emphasis is being placed on this criterion is disturbing.

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:

Voluntary bodies spend much of their time fundraising to enable them to continue their existence - often to the highest professional standards. If they must ask the general public for more money to pay back to the exchequer, there may be some resentment build up.

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:

In this instance commercial criteria are justified. Is the flight commercial? - then commercial rates should apply, if not, then no.

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- for all bodies whose objective is the preservation and saving of life no fee should be levied what-so-ever. I am concerned to read that bodies such as the RNLI must pay anything at all - even if for non water based sets. I would make a plea that their discount is raised to 100%.

This must cover training as well as in an emergency.

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?:

Only where being used for commercial / pleasure traffic.

Not when dealing with organisations involved with the preservation and saving of life, or related events such as training.

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?:

As 7 above.

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

See previous answers.

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 view

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.:

I am disappointed that yet again there is an assumption that efficient use of the radio spectrum equates to money!

This is a false premise from which to start.

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?:

As answer 7 above.

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 opinion

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 opinion

Comments:

To summarise, I am disappointed that there is an assumption that efficient use of the radio spectrum equates simply to money.

Voluntary bodies which train for and carry out search and life preserving roles must be exempt. Otherwise the burden of these costs will ultimately impinge on the safety and operational efficiency of their members. At a time when a stand-alone communications network, independent of government/statutory bodies, exists to help in times of need, it seems short sighted to jeopardise it in the greedy quest for more money.