

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?:

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.?:

I take part in two activities that will be affected by the pricing of ground station users: mountaineering and general aviation.

Mountaineering: Volunteer Mountain Rescue Teams (MRT) are a critical emergency service to walkers and climbers. During a rescue, they currently use radios to coordinate activities between themselves, RAF MRTs and RAF Helicopters. Radios are therefore a critical piece of safety equipment, ensuring that casualties are found and rescued as quickly as possible - important when hypothermia as a result of shock is a danger.

The obvious alternative of mobile phones is not adequate as coverage in mountainous regions is minimal at best, and cannot be used to communicate with helicopters.

As volunteer organizations, usually charities, with minimal resources, they may not be able to afford a spectrum license, or may have to cut back on other safety-related spending. In either case, this will have a detrimental effect on safety.

Aviation: I currently fly a microlight from an unlicensed airfield, with a manned Air/Ground radio. This is used to provide safety information to pilots about current conditions at the airfield, for example wind speed, direction, any aircraft known to be operating in the area.

This is operated by one of the people running the airfield for flight safety. Imposing an additional cost on the airfield will result in the Air/Ground radio being retired, with the obvious effect on flight 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?:

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:

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 (if only because I have an aircraft radio license!)

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:

If the discount is 100%, then yes!

I find it quite unpalatable that we should in any way charge emergency charities for spectrum use.

The UK is almost unique in having a volunteer mountain rescue service. In most other countries (France, Switzerland), mountain rescue is provided by the government, with the obvious cost that entails.

The UK has a mixed model, with RAF teams (who consider rescues training) and volunteer services. Given the savings the government makes from the volunteer MRTs, it seems absurd to charge them.

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?:

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?:

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

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:

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.:

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?:

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?:

Yes, I believe spectrum use by aeronautical radionavigation aids is currently uncongested.

I believe that congestion will reduce over time, as GPS IFR navigation become ver more popular, and ADF and VORs are retired.

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: