

**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?:**

The emergency services that use these channels (UKSAR, Coastguard, RNLI) must be given a priority in the process. Looking at this from a purely commercial view will skew the process and not take into account the vital lifesaving work that these organisations undertake. Saving lives must come before commercial consideration and before the process is opened commercially.

**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.?:**

Put simply, the lives of both UK SAR personnel and also of the missing persons and casualties could be put at risk. If the present situation re channel allocation via MCA changed and teams were forced to share channels as was previously the case, then cross channel interference is far more likely and lives could well be put at risk. In a worse case scenario such as a major incident where the UKSAR is part of the MI plan, the reduced channels would risk becoming unworkable and lives would be lost.

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

There is clear evidence that there are many other channels which are available that are clearly not being fully utilised. These should be considered before the channels that will affect UKSAR operations.

**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:**

Buxton MRT, like, all other MRTs is a charity and has to work incredibly hard to raise every penny on top of undertaking the training and providing the 365 day 24 hr service that the public rely on. If the cost of the licence were to go up, the money that would have to be diverted to meet this costs would come from other areas of the team funds, this could well mean that we are not able to keep our equipment up to date and lives would be put at risk. Ultimately, as the charity is run by trustees who are responsible, the trustees may well feel unable to continue in post knowing that we have cut the level of service to meet the increased fees and hence the charity may be

left without vital trustees which could affect its operations, the impact of this is a reduced level of service and this would have an effect on the casualties.

**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:**

Absolutely

**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, any organisations that save lives as part of their remit, MRT, Coastguard and RNLI spring to mind immediately.

Indeed, rather than discounting the fees, these organisations must not be charged. All are clearly charities and as such are easily auditable to identify that a charge is not appropriate.

It is also vital that as a result of any charging, not SAR channel must be lost, in fact, more should be allocated.

**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?:**

Provided that the use of not for life saving activity. The SAR channels have been very carefully considered by UKSAR operators group who have worked hard to ensure that the channel use is already as efficient as possible.

**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?:**

Only in the band that is used for commercial use and gain.

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

That depends what the increases are going to be. There should be no charges applied to any channels that are used for search and rescue activity, either UK based or international

**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:**

Buxton MRT is not a stakeholder in either. We do not think that charges should be applied to any distress beacons and no charges should be raised against SAR organisations for the use of these devices,

**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 in the area of the spectrum that is used for commercial purposes and commercial gain,

**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 in any life saving devices.

**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 am not in a position to answer this question, I do not have enough knowledge in this area

**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 do not have an opinion

**Comments:**

UK SAR should not be charged, or the MCA if they provide this service for UKSAR. We save lives, do not put any barriers in the way of this service