

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?:

Ofcom should ensure that they consult all users of this band - not just the commercial users. The Scottish Cave Rescue Organisation (SCRO) is a voluntary organisation which provides an underground rescue service across the whole of Scotland. The SCRO uses multiple VHF channels to communicate with mountain rescue teams and other rescue services. SCRO would like to ensure that all parties are consulted.

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.?:

SCRO is a voluntary organisation and as such our funds are limited. SCRO co-ordinates with the local mountain rescue team and other rescue services, we therefore require use of multiple VHF channels for this purpose. The proposal to charge for use of these channels would make a significant impact on our annual budget and reduce expenditure on training and rescue equipment. Ultimately this may put lives at risk, we therefore urge Ofcom to exempt all voluntary rescue services from any license fees.

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

As stated in response to Question 2 above, any charges will have a negative impact on SCRO and other rescue teams.

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:

As stated in response to Question 2, SCRO believes that all voluntary rescue services should be exempt from license fees.

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:

SCRO has no opinion on this matter.

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:

SCRO considers that license fees for voluntary rescue services should be discounted by 100%.

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?:

This may be applicable in the commercial market but we do not believe that license fees should be imposed on voluntary rescue services.

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?:

SCRO does not agree that pricing should be applied to rescue services using VHF channels. SCRO has no opinion on the licensing model for commercial users.

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

Voluntary rescue services such as SCRO work with a limited budget, much of which is derived from charitable contributions. The imposition of license fees would reduce the available budget for training and rescue equipment which reduces the effectiveness of our service.

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:

SCRO has no opinion on this.

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.:

SCRO has no opinion on this.

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?:

SCRO has no opinion on this.

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?:

SCRO has no opinion on this.

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

SCRO has no opinion on this.

Comments: