

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?:

Listen to those concerned with safety. That would be a good place to start but from recent interviews Ofcom seem to have made up their mind in that regard.

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.?:

The proposals WILL compromise safety and we are shortly to see Mode S introduced for all aircraft in an effort to IMPROVE safety. Any charges which will decrease the number of ground stations picking up those transmissions and having the ability to communicate is obviously going to decrease the safety margin. It is gross negligence to abandon a well used service just to increase revenue

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

Ofcom know that this is an unanswerable question specifically and I believe it is simply a question formulated to ensure there are "Figures" which show little actual evidence. Common sense answers this quite accurately and if those figures are deemed essential to Ofcom then it should interview EVERY ground station provider to obtain a truthful and meaningful statistic

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:

It has already been well published in various user media that this WILL impact on users and even the Sunday Telegraph recently reported that search and rescue could be seriously put at risk because of Ofcom's proposed actions

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:

I believe this to be a double sided question

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:

The fact that Ofcom can even ask this question about compromising any efforts to saving life simply sums up what a ill thought through and simple money raising objective this proposal is.

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?:

NO

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?:

NO

There is no reason whatsoever to justify making a charge for airwaves that are safety related other than the raising of revenue for the treasury.

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

YES, and LONG term. This is a recipe for safety compromise and if, as is very likely in the future lives are lost directly due to these proposals then considering Ofcoms arguments are that this area needs to be Commercialised then I hope the same rules will apply to those individuals who have caused this problem regarding corporate responsibility and take the consequences

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:

This question is obviously based on the fact that these proposals are a done deal so it seems pointless to have this consultation

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 think any fee is inappropriate for what is an essential safety facility for thousands of travelers from all corners of the world

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?:

I think any fee is inappropriate for what is an essential safety facility for thousands of travelers from all corners of the world

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?:

It is probably about right at this time and appropriate in offering maximum opportunity to facilitate good practice. I believe that with newer and more modern features coming into the safety market but with increased efficiency in existing products the spectrum usage remains about right both now and for the future

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. I do not believe that Ofcom has listened to any of the safety and usage arguments from those involved in the Maritime and Aircraft industry and all rational arguments have simply been ignored

Comments:

I believe that Ofcom have had one objective all along and that has been to raise revenue for the Government and the whole process has been a sham and the outcome is a forgone conclusion