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 voluntary rescue organisations should be given priority in the process as their only source of funds is from voluntary contributions from groups such as mine and personal contributions.

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.?:

In an emergency rescue situation every help should be available to organisations such as mountain rescue and search groups and also the RNLI.

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

this technical question is outsifde my knowledge.

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:

the search and rescue organisations in this country are run by volunteers and the necessary expense that they encounter are met by voluntary contributions from persons such as myself and my friends. To provide rescue equipment, vehicles and training is an ever mounting cost, adding a statutory cost for their communications by radio when out on a life or death rescue is immoral.

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:

Technically outside my experience

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, they should be fully discounted to enable voluntary search and rescue organisations to contiue to operate as efficiently as they are able. being available fully trained and correctly equipped is more important than having to find more money to pay a radio licence fee. I have first hand experience of the value of Ogwen Valley Mountain Rescue Organisation from when my properly equipped son (GPS, Bivi Tent and extra clothing) found himself unable to safely descend from Glyder Fawr on being stranded by a sudden and severe weather change. OVMRO went and saw him safely down one night two years ago.

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?:

Life saving activities should not be disadvantaged, there is no reason why leisure activities should not be charged.

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?:

Business radio equates with maritime and aeronautical use for commercial gain. this would exclude search and rescue organisations

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

Short, or long term there are many reasons as noted above why no charges are made for search and rescue operations.

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:

Outside my technical knowledge

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.:

should not be levied when life saving activities are endangered by making such a charge.

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 when used by voluntary life saving bodies, where it would cause reduction of other essential requirements, training, equipment, and could cause some of the volunteers to give up in despair at sush a short-sighted action. The police do not go out in lifeboats or venture onto the hills in severe conditions: they call our RNLI or MROs, the experts, but only because they have trained in their own time to be so!

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?:

something I have no knowledge about, but I would venture that for a few years there will be very reduced aircraft movements.

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:**

you could say that the suggestions you make mean that everyone who ventures into the outdoors or inshore waters should only be allowed to do so if they have adequate insurance to cover them for the expenses of rescue as in the Alps. I do not think this would go down well with my fellow voters.