

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?:

As there is no single organisation to represent the whole user base for the Spectrum we are reliant upon the "professional bodies" i.e. CAA, MCA, Police, Fire, not only to represent themselves but also the Voluntary Sector which will include the RNLI, Mountain Rescue teams etc. Not all UK lifeboats are under the cover of the RNLI.

Like wise from the Commercial standpoint ABP etc can speak for the commercial operators who have the ability to simply pass any additional cost on to their customers.

The people who appear not to get a direct say is the general public and the large number of small voluntary organisations who in some cases yet to find out this is even up for discussion.

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 people who don't get to speak and who will be affected the most in the simple member of the Public trying to make things safe for the use of their small boat where a simple VHF radio that may only be used normally to check that it is operating correctly, but when the need arises can save people's lives, may well be priced out of the market.

The MCA already has a hard enough time to get people to buy VHF radios and this would simply compound the issue if the licence becomes dearer. Likewise voluntary organisations who are just out to help save lives will also be severely hit by any increase in costs. Where do they get a say they are equal to the impact of the proposed changes on these organisations?

Where some of the rescue groups who have a hard enough time at the moment just to pay for fuel, how do they get to be considered in this?

Some of the figures being mentioned could put an additional £100,000.00 on the operating cost of the RNLI, that equates nearly two lifeboats.

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

The current spectrum is used for both commercial and leisure activities. This spectrum space however is an international area and not just a UK issue. If spectrum costs are increased in the UK, then people will simply go elsewhere to pay the licence fee or simply not bother. The latter is the worry as there would be a potential to have a large number of unlicensed users and stations.

I also do not believe that a safety issue which is where a vast amount of the traffic currently in the spectrum space, should suddenly become a luxury item and a revenue stream. The bottom line is the radio is already a luxury item and adding to the costs will simply encourage more people to find alternatives. A mobile phone is not the answer.

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 current use will in my opinion not change, the traffic levels and channel utilisation also will not change. What will change is a smaller number of people will be prepared to use the equipment. This will in my view waste the space and as the space is an international agreed use, then we will become the poor relation to the rest of the world.

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.

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.

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. The VHF channels are there for safety, they are not a "pay as you go" item. They need to be there for everyone.

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

See above responses.

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:

Yes, but how are you contacting them and making them aware of the issues? I know of several locally who have heard nothing about this to date.

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.:

No. The rate is too high.

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?:

No. The rate is too high.

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?:

Currently I do not believe the spectrum is over congested, and I also believe that technical advances will allow for high traffic levels to be delivered within the current bandwidth, and therefore saturation of the current channel allocation is avoidable.

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

Yes, but I also think that not all of the radio spectrum should be a commercial bonanza.

Comments: