

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 take a balanced view from all aspects of our society but should bear in mind that it is the user who ultimately have the final say. Regulators and Government are placed by the people for the people and at no time should any regulator forget that fact. Institutions are by their very nature unbending, stringent forces which should be avoided at any cost.

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.?:

Radio frequencies provided for the safe passage of or assistance to any maritime or aeronautical user should not be charged for in any way, If ground control stations for aircraft were to refuse to pay a 'licence fee' and subsequently stop their operations, how long would it be before a major air disaster occurred. If it were not for radio being available on the Titanic, all be it basic morse, how many more people would have died? herald of free enterprise, the list goes on. Radio in maritime and aeronautical use is a requirement now not some executive toy that can be messed with.

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

Ground based stations are an integral part of that system it is from ground bases that emergency assistance comes. Competitiveness does not come into it in any way, shape or form, to place a further burden on any emergency service is unfair to the British people who support them.

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:

Safety is paramount, the airwaves need regulation to avoid cross banding, but to envisage charging the very people who are there to save life, be it on the beaches of Britain, or on the seas, or in the air is a retrograde step. Think very carefully- it could be you needing rescue, what if the coastguard, RNLI or air ambulance were not available because you decided an extra few pounds in the coffers was more important than their services?

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:

there is nothing to be gained, the channels are already set, it works, don't break it!

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:

Any organisation whos primary role is life saving should most especially be exempt.

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?:

I dissagree in the strongest terms. Leave maritime and Aeronautical channels alone, I doubt you will find anyone in the real world objecting to footing the cost (which?, airwaves are free)of these channels.

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?:

You ask the same question twice, worded differently! NO you should not charge ANY maritime or aeronautical use of VHF communications.

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

THEY ARE FOR THE SAFE PASSAGE OF MARITIME AND AERONAUTICAL USERS. LEAVE IT ALONE!!!!!!!!!!!!!!

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:

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.:

Your questions do not relate to the fundamental problems of what you propose, charging for any band of the spectrum used for emergency services is out of the question.

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?:

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?:

Pilots adopt a very easy way of ensuring congestion does not occur, they don't speak when someone else is speaking. they are self regulated in terms of how their frequencies are used, unfortunately Ofcom doesn't have a similar system.

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

Comments:

Ofcom is so out of touch with the realities of life they need to get out of their little offices and go and work in the fields they propose to change, take a day on a lifeboat, with an ambulance, with the air ambulance. then report on what is needed.