

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 far as the aeronautical spectrum is concerned, the CAA need to review the potential impact of proposed charging regimes. The VHF aeronautical frequency spectrum is not a highly desirable asset, it is an integral part of a safety management system.

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.?:

I do. I can foresee organisations reducing the number of frequencies they require to an absolute minimum leaving no system redundancy. Many places will simply fail to renew their license and thus remove the air to ground communication capability. This will reduce safety as pilots will not be able to receive information about activities that may/will affect them.

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

Any charge will ultimately be transferred to the customer. The UK already has the highest en-route navigation charges in Europe; increased rates will merely force airspace users to avoid UK airspace thus reducing overall revenue.

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:

No comment

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:

The whole system is safety orientated based around "human life in an emergency". I don't consider that there should be any charges for spectrum that is used in this manner.

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. These frequencies are already being used to capacity so why penalise the operators. What on earth is a "potential alternative application"? Have you any evidence of a need?

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. I don't agree that there should be any charging mechanism.

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

The CAA and all ANSPs will be required to complete business reviews and mandatory (European mandated) impact assessments. This is just a money grab.

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:

No comment

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. Your phrase "providing incentives to ensure efficient use of spectrum" implies that the spectrum isn't being efficiently used. What evidence of this do you have?

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. See above

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?:

No and No.

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 fundamentally fail to see that aeronautical frequency spectrum should be rateable. We (the UK) have international obligations.

Comments: