

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 a member of a mountain rescue team I am concerned that the needs of charitable organisations involved in life-saving work will be overlooked in a rush to gain commercial benefit from the spectrum. Mountain rescue and other voluntary organisations do not have the lobbying power of commercial organisations. Ofcom must ensure that the voice of such charities is given the prominence it deserves.

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.?:

It would be extremely worrying if the number of channels available to teams such as ours were reduced. Channels are shared out sparingly already between teams that often have to work jointly on serious incidents or have to cope with multiple call-outs at the same time in the same or adjoining areas. Communication is already difficult in the mountainous areas in and around the Lake District in which we work and the points at which relay stations can be placed for particular callouts can be limited. We can't plan where we have to go and under what circumstances - we go where and when we are called and need to know that we can keep in contact with the rest of our team and our control station wherever we are deployed. If there is more interference between teams being forced to work on the same channels the lives of casualties and our own team members will be put at risk.

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

I don't have an opinion on this; I am simply concerned about the safety of mountain rescue team members and casualties.

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:

Mountain rescue teams are entirely funded by voluntary donations and all team members are volunteers. Our own team survives on an income of just £20,000 of hard-won funding a year which has to pay for everything - vehicles, base, equipment, training, and more. Any increase in costs, however small it may seem, has an impact

on our capability to respond. This is at a time when other legislation is placing greater demands on our time and finances and, crucially, call-out rates are going up.

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 have no particular opinion on this.

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:

Voluntary organisations, like mountain rescue, involved in life-saving operations should not be charged. This is a reasonable contribution to ask for agencies that provide a vital service at no direct cost to the public purse. In fact raising money from other parts of the spectrum offers a great opportunity to make this important gesture to the UK's search and rescue teams.

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 have no particular opinion on this.

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?:

Any pricing system is acceptable if it takes into account the points I have made above.

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

It would depend on what fees were applied to organisations like mountain rescue. I reiterate that I believe no charges should be made for such services.

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:

I have no particular opinion on this.

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 have no particular opinion on the appropriate rate for commercial users.

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 have no particular opinion on the appropriate rate for commercial users.

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?:

I have no particular opinion on this.

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

I have no particular opinion on this.

Comments:

Mountain Rescues teams already face pressures on finances from every quarter. Any further call on finances and, worse still, a reduction in the channels available to teams will put lives at risk.