

**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?:**

Financial considerations should be secondary to the life preserving work of voluntary organisations such as search and rescue.

**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.?:**

As a member of a mountain rescue team in a coastal area I feel that the safety of team members and the public could well be compromised if constrictions on the number of available channels leads to less efficient communication. We need to be able to have radio communication separate for coastguard, different MRT, RNLI, SARDA, rescue helicopters (military, civil & police) etc. without compromise or co-channel interference in remote areas where other networks are ineffectual

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

YES. There are plenty of other channels that have less traffic than those in this proposal

**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 is a voluntary organisation that fulfills an essential role on behalf of the police. We are extremely tightly resourced and it is reckless to remove funds under this proposal that could be used to supply teams with essential safety equipment. The health and safety of team members and the public will be directly affected by this. It will directly put lives at risk as cash strapped teams are forced to use outdated equipment to fulfil their humanitarian role.

**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. The discount should be 100% for life saving organisations. No SAR channel should be affected or removed.

**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, not for life saving organisations. SAR use of channels is already very effective.

**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?:**

Only for commercial 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?:**

Yes. Once this is place, the satus quo will tend to be maintained, to the detrement of the SAR functions in the UK. NO charges should be made for channels used be SAR organisations

**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 response

**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.:**

Only for commercial organisations

**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?:**

Only for commercial organisations

**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 response

**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 response

### **Comments:**

In these increasingly incertain times SAR organisations provide an essential emergency resource, often at no cost to the state. It is in my opinion immoral to remove funds from these organisation in this way. Team members willingly give up time and resources, to enter dangerous situations for the humanitarian benefit of their fellow citizens. They put their own lives at risk and should expect and deserve the very best backup and communications the nation can offer. To try and restrict their communications through cost or channel availability is wicked and immoral.