

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?:

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.?:

A sailing club shore station, such as that at our club, has two major uses. Firstly, the management of races, and secondly a role in the safety of participants. The Officer of the Day on the bridge of the clubhouse (who has responsibility for the safe management of sailing) has a view of the racecourse that those on the support boats do not have. As such the OOD is able to direct support effectively to boats in trouble, to prioritise help where several boats may need help at the same time, and to coordinate club support with external assistance in the event that it should be required. Placing an additional charge on the use of the shore station for sailing clubs trying to balance tight budgets is likely to lead to the adoption of less satisfactory and less reliable alternatives, such as mobile phones, which may get left behind by boat crews, suffer water damage or simply not have a signal. As such there is a real risk that the proposed charges could have significant and detrimental safety implications for sailing clubs.

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

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:

Many dinghy sailing clubs currently suffer from falling membership, which in turn creates significant problems with balancing budgets. Facing additional charges such as those proposed, which could be significant in some parts of the country and where more than one ship to shore band is used, can only impact negatively on the viability of clubs, and in turn on the sport as a whole.

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:

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:

Many sailing clubs, such as Eastbourne Sovereign Sailing club, have Community Amateur Sports Club status with the HM Revenue and Customs. It is recognised that such clubs play an important role in the local community and in particular in encouraging participation in active sports. Since our use of a VHF shore station plays an important role in ensuring that such participation is able to be carried out safely it would seem appropriate that, at the very least, sailing clubs with CASC status should be exempt from such charges.

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?:

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?:

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

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.:

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?:

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: