

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?:

Search and Rescue (SAR) including Mountain Rescue Teams and other Emergency Service agencies should have due priority in this process. The needs and views of these life-saving emergency response organisations, which are charitable and not-for-profit units, should take due precedence over those of commercial sector. In essence you should not be considering charging for use to these organisations, especially as they receive little or no support from the Government and its agencies for the vital work they carry out.

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.?:

The safety and well-being of both the casualties and members of Land-SAR organisations such as Mountain Rescue Teams would be put at risk. If Mountain Rescue Teams had the number of channels reduced or were forced to share with other agencies, this is likely to result in saturation and a dangerous increase in co-channel interference. During multiple or major incidents, which often carry the highest risks and often involve more casualties and Team Members, then the vital communications could become unworkable which could have exceptionally serious consequences.

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 a large number of channels that are not being fully utilised within the UK.

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, RNLI etc., need to retain all the hard-won money they have raised via donations and the time and painstaking effort taken for fund-raising to fulfill the life-saving activities they perform. They already have to pay VAT on items which should be classed as exempt, donations are down and it is no exaggeration to say that many lives will be put at risk if the cost of the license goes up, voluntary SAR agencies have to contribute, or SAR channels removed. It is bad enough that they

have to give their time and equipment for free, surely it is then immoral to charge those persons who are fulfilling a humanitarian role and are already over-stretched because of increasing casualty rates, new legislation, etc.

Voluntary life-saving organisations such as Mountain Rescue, RNLI etc need to retain all the hard-won money they have raised via public donations which take a great deal of time and effort in fund-raising to fulfill the life-saving activities the organisations perform. There is little doubt to state that many lives may be put at risk if the cost of the license goes up, resulting in voluntary life-saving agencies have to contribute from limited funds, or vital SAR channels are lost, shared or removed. It is illogical and immoral to charge those voluntary life-saving organisations who are already over-stretched because of increasing casualty rates, callouts, new legislation, higher expectations, greater inter-agency expectations and training demands etc.

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:

For all voluntary life saving charities the use of these channels should be 100% discounted. It is essential that the existing SAR channels are retained to allow continuing provision of an effective SAR function as the current Government provides no other funding for these essential rescue services.

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?:

If it is for commercial use then yes and providing its use is not for life saving activities. It should be noted that care has been taken to make the use of SAR channels as efficient as possible. The system works why change it?

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?:

If it is for commercial use then yes, but not for that part of the spectrum which is used for rescue. As the SAR networks are for life saving and not commercial gain these should be free or 100% sponsored by the Government.

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 do not get any government support, they are entirely supported by collecting funds from the public and honestly do not have a surplus to cover anything like this. Not in 2009 not ever. No charges should be made for channels that are specifically used for Search and Rescue operations.

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:

As Search and Rescue organisations, are not directly involved in these areas of radar or beacons, however if the beacons are of the distress Sarsat EPIRB or PLB variety, I believe that no charges should be brought against voluntary SAR agencies for these life-saving devices.

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 that spectrum which is used for commercial gain.

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?:

Not if the spectrum is used for life-saving activities.
What price do you put on life!

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 am unable to answer this question as I have no knowledge of the level of congestion etc.

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 opinion in this matter as this is outside my interest.

Comments:

Volunteer agencies especially Mountain Rescue put a lot of time and effort into filling the gap left by statutory rescue agencies. Not only is their workload increasing but the cost of operations is soaring through the roof. Without these organisations statutory bodies would be hard pressed to fill the gap to the level and competence currently supplied by volunteers. At a time when donations are falling fuel costs are rising to now ask them to start paying for radios which are an integral part of the operational effectiveness of the Mountain Rescue operation is penny pinching and short sighted. Given some of the remotest parts of the country are covered by a mere handful of willing volunteers radios are essential to the successful preservation of life for casualties. In addition the security and wellbeing of team members will be put at risk without effective communication systems in place. If people will be at risk why will they volunteer to do the job? Without communications how can these volunteers communicate with those statutory authorities that do respond? To price out of existence the effective use of radio communications for Mountain Rescue and the RNLI will put more lives at risk than ever before, both those of the casualty and those of the rescuer. This proposal to charge volunteer agencies who regularly save lives for no commercial gain and mainly funded out of their own pockets is foolhardy and dangerous as it will put lives at risk and send the wrong message to those who volunteer, now and in the future.