

**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?:**

Emergency services including all search & rescue teams including Mountain Rescue need to be given priority. These are charitable and non-profit making groups working for the safety of everybody and they need to be given priority over commercial enterprises for protection and preservation of people.

**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.?:**

Search & Rescue services need to have available to them a number of channels for effective and fast communication in order that the safety of the people they are rescuing is not put at risk together with the safety of the rescue services themselves, who are volunteers and whose safety shouldn't be put at risk in this manner. If the channels had to be reduced or shared, this could waste valuable time during an emergency and safety would be compromised. Health & Safety is the vital consideration in these matters and this proposal to charge licence fees would divert money from vital life saving equipment. The preservation of human life is paramount.

**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. I understand there are a large number of channels not being fully utilised.

**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 and all the other voluntary rescue services such as the RNLI rely on charitable donations. The proposal is that those charitable donations will be going straight to the government for 'licence fees'. People do not give charitable donations for the benefit of the government - they make charitable donations for the preservation and protection of life.

These voluntary rescue services should be government funded in any case, just as with other emergency services such as the ambulance service, so it will seriously

effect funding raising if the public are aware that their charitable donations instead are going to the Government.

**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 rescue services whose object is the safety of human life in an emergency should be given FREE use of whatever they need in order for the protection and preservation of life and the speedy transfer of casualties to hospital. Mountain rescue teams work in remote areas where it is vital that they have good communication which other networks wouldn't provide and lack of good communication would compromise health and safety.

**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?:**

Provided it does not involve search & rescue services.

**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?:**

Yes - for the services used for commercial purposes

**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 - the search and rescue services should NOT be charged anything, ever. The charitable donations received by search & rescue services would be put severely at risk if the public knew they were going to go straight back to the government. The health & safety of the rescue teams and the people needing emergency assistance would also be compromised.

**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:**

Anything used by search & rescue services should be FREE of charge in view of the excellent voluntary work they undertake in order not to jeopardise the safety of the people being rescued and the rescuers themselves.

**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.:**

Charges should only apply to the commercial sector. Search & Rescue services should receive them FREE.

**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?:**

Charges should only apply to the commercial sector. Search & Rescue services should receive them FREE.

**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?:**

Don't know.

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

Don't know

**Comments:**

The safety of people who need rescuing and the rescuers themselves will be put at risk if charges are levied to search & rescue organisations. It is immoral for money received from charitable donations should be claimed by the government for licence fees for an emergency service.