

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?:

Ofcom should ensure that they have direct contact with SAR & Emergency agencies and that as these are in the main voluntary and charitable organisations they should be given priority. Please bear in mind that Health & Safety Reasons (PPE) virtually every team member has a radio and on any one day there may be hundreds of people active across the UK. Surely the saving of life or preserving it should have priority over any commercial considerations. As each time has to raise their own funds any increase in costs has a severe effect on the resources of the teams.

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 lives of the people who carry out the searches and rescues would be put at risk. There has been a great deal of work carried out to ensure that the current SAR band plan is efficient and matches the task required. Any reduction in the number of channels available to Land based SAR Teams or a move to share with other agencies would lead to saturation and a substantial increase in cross channel interference. This would threaten lives as where the channels are required - multiple or major incidents communications could be severely disrupted or even fail. Please understand that Land Based SAR is not just Mountain Rescue but the MR Teams attend plane crashes, train crashes, major flooding incidents and in many parts of the country carry out the Police's work of looking for missing persons - e.g. despondents, Alzheimers sufferers and missing children

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 believe that there are a large number of under utilised channels still in 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:

It is clear that Mountain Rescue & Land Based SAR and the RNLI would be severely financially constrained if they had to pay these proposed fees. I am disgusted that a Government organisation is looking at charging these voluntary organisations to use a

resource that is vital in their life saving efforts to assist in the saving and preservation of life. If these organisations ceased to exist the cost to the government would be immense. All the above organisations are vountary and have spent a great deal of time and effort to raise their funds. i find it immoral and very irresponsible to charge these organisations who are fulfilling a humanitarian role at no cost to the government when they are already over stretched because of increasing casualty rates, increased responsibilities and new legislation.

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 - Rather no - deon't discount DO NOT CHARGE!!!. No SAR channels 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?:

I have no issue with you charging for commercial enterprise but no charges should be made for life saving activities as these channels have been proven to be needed and to be highly efficient

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?:

Again only if for commercial gain

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

I will state again - no fees should be levied on life saving channels both for national and international channels used for Search & Rescue.

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:

SAR is not a stakeholder but there should be no charge to life saving agencies for the use of these beacons.

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.:

Again this should only apply to commercial enterprises and not agencies engaged in life saving.

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?:

Again not if used for life saving activities.

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 do not have any knowledge of this so I cannot answer.

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

Not in a position to comment

Comments:

All the channels used for life saving activities should be sacrosanct as a free resource. Any increase in costs could potentially put lives at risk especially if those costs are levied directly onto the voluntary agencies providing the service. Surely the protection and saving of human life is more important than financial gain.