

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?:

The whole concept of charging the RNLI for services that are far and away better and better organised by the RNLI than the government offices could possibly do, is despicable.

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.?:

They will certainly affect safety at sea and on shore, as the cost will have a knock on effect for the RNLI in provision of their free service backed purely by the public, for whom they tirelessly work, whatever creed or colour.

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

The plain logic is sufficient, the public already contribute to the service provided by the RNLI, whose own lives are at stake in the provision of that service. Any extra cost will be to the reduced facilities being offered. This has already been borne out in the effects on other essential services such as in the field of hospital costs and management. In the end the public suffer at the expense of government mismanagement and bureaucracy.

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:

All communications which affect the safety of anyone should be provided at no cost to the operators. A commercial concern is a different matter altogether, and so I fully believe that shipowners should be made to pay for the services which are given by the RNLI and other S&R services.

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:

There is a great deal of strutting being done to make change for change's sake, and it makes little difference to the overall picture.

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:

I believe that fees should be waived for the RNLI and other S&R organisations.

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 am positive that there are other technical solutions to the congestion, the side effect of larger vessels for example is that there is less communication congestion. More positive restrictions on use could also be applied, with fines for misuse. It has been shown in the public sector that increasing costs do not of themselves make a difference to the user (take fuel costs and cigarettes, for example).

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?:

I believe that fees should be on a sliding scale in relation to the size of vessel and the size of business turnover, and not be across the board as it were.

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

Unlike government departments, the public do not have bottomless pockets; soem form of board should decide as to specific needs and realted fees. The short term will be disastrous for the samll user and for charities.

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.:

Every statement has to start from somewhere, and it is impossible to say with any certainty as to the outcome of any proposal; however I project that many will develop attitudes and policies which will place ships, personnel and cargoes, let alone the environment at risk; is that worth the cost of the clean up and insurance, which will be done primarily by the charities and peripheral services that you will be charging extra to and therefore reducing their potential, let alone the costs to the government departments.

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?:

I answer as for Nr 11

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?:

If nothing changes over the years, that would be an exception. To project any future is only based upon current status and current figures and upon current science; any change in that over the passage of one year will have profound effect upon any projected possibility.

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: