

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 be keenly aware that voluntary organisations such as Mountain Rescue must have a major input throughout consultation.

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.?:

My team covers one of the largest and most remote areas of Scotland 120x50 sq km and since using the UK SAR Band Plan we now have 90 % coverage with ground based radios and hill repeaters. Any charging on our meagre resources would force a reduction of channels and an inability to communicate with other agencies where time is likely to be a matter of life or death. I personally have 35 years experience in Mountain Rescue and can well remember occasions when lack of communications resulted in unnecessary suffering and even death. Mountain Rescue in the UK is free, undertaken by volunteers and is a charity. However, it is the envy of virtually every other country as it provides one of the most professional services anywhere. The volunteers in many cases are outdoor professionals who over the past 75 years have developed mountain rescue to its present level, and at very little cost to the tax payer.

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

We are such a small part that it cannot influence the larger commercial picture.

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:

We in Galloway do not have the high profile enjoyed by teams in the more popular walking/climbing areas and therefore fund raising from the public is considerably more difficult. However, as a MRT there is an expectation by the Police and public that we provide the same service but with considerably less funds to maintain our vehicles, technical equipment and training. If we are asked to pay more to use the UK SAR Band Plan we will have to compromise on the other equally essential areas that make up a modern MRT. At the moment we can transmit or receive vital information

providing the necessary link in the chain of survival. Any charges will have a major detrimental effect on our present level of service.

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:

Not applicable

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:

As a charity there should be a zero rating for any use of the radio spectrum allocated for the specific work of mountain rescue. It beggars belief that any Government agency would even consider charging an organisation dedicated solely to saving lives and relieve suffering.

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?:

There may be a case outwith the scenario of rescue and life saving which should be exempt from the spectrum.

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?:

Our view in relation to mountain rescue and similar charitable rescue organisations is that there should be no charge

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

There is no justification to charge a voluntary organisation, now or in the future and whose primary function is to assist those in need. Our team runs on a shoestring and we are about renovate an old building and another hit on our budget would create a financial crisis.

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:

This does not affect our team.

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.:

The response to this question is as indicated earlier that there should be no charge levied on mountain rescue teams and others involved in similar voluntary work.

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?:

Although it is unlikely that we would use this feature we believe that any use by charities outwith the present arrangement should be free or at most a token payment.

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?:

An area that does not apply to us.

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

Again something that will have no bearing on our ability to operate.

Comments:

It has already been mentioned that any thought of charging a voluntary charity should have been dismissed at the outset, and the need for people like me to waste valuable time on a consultative process would have been avoided. It is difficult for me, who has given a lifetime of voluntary service to mountain rescue, to comprehend the mindset of anyone who would consider charging for something that most people would consider an automatic right. MRTs save the UK government millions of pounds per annum and providing them with a continuation of the present arrangement through the UK SAR Band Plan is a small price to pay. In Scotland MRTs receive an

annual grant from the Executive to assist with their running costs. How ironic it would be if the UK government took back some or all of this money. I am certain that the vast majority of the British public will be deeply offended at the possibility of the government, through Ofcom, seeking money from charities.