

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?:

I have no substantial response to question 1

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 outcome of this exercise has potentially fatal consequences for members of the general public. In general, I agree with the idea of making various parties pay an appropriate amount of use of the spectrum. However, there needs to be exceptions made for users that supplement the professional emergency services.

The RNLI and Mountain Rescue teams save lives in circumstances where the emergency services simply cannot help. Furthermore, these organisations are mostly dependent on people putting their spare change in the box on the bar to run. Any increase in their spectrum subscriptions will mean that there would be less money for that training exercise or that piece of equipment that will be used to get someone to safety. For example, if the Cairngorm MR Team hadn't have turned up in 2004, there would have been 39 dead school children. These organisations make a difference.

A simple exemption scheme for these services such that they pay a peppercorn rent for their small slice of spectrum will have a big positive effect on them and minimal effect on the financial aims of this proposal. Given the long-standing reluctance of the government to provide support to these organisations, this would be a small, but significant gesture.

It would be heartening to see some humans making a decision instead of an accounts ledger.

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 have no substantial response to question 3

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:

I have no substantial response to question 4

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:

I have no substantial response to question 5

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:

Please refer to my response for question 2. Organisations such as the RNLI and Mountain Rescue teams should have a discount to a peppercorn amount.

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 substantial response to question 7

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 have no substantial response to question 8

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

If a major discount system for the RNLI and Mountain Rescue teams is not in place prior to April 2009, then there is a chance that subscriptions will lapse and cover will be lost.

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:

I have no substantial response to question 10

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.:

I have no substantial response to question 11

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 have no substantial response to question 12

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 have no substantial response to question 13

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 substantial response to question 14

Comments:

Appropriate representation of the sea and hill-using community must be demonstrated in this process as lives are possibly at stake.