

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?:

Yes all airports, airfields and aircraft operators should be consulted.

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.?:

Air to ground radio and transponder frequencies are vital for air safety. As are the search & rescue frequencies.

Light aircraft are particularly safety dependent on air ground radio frequencies which are in continuous use throughout every flight. If ground stations close due to imposition of charges, vital safety information will not be available for aircraft. This WILL impact on safety and result in deaths and injury. Liability for this lamentable state of affairs could be tested in court against OFCOM.

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 the inter European business aviation community will not use those UK airfields that will go out of business due to these new charges. This will have an overall detrimental effect on UK plc

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:

Light and business aircraft have just been landed with very high fees for compulsory fitment of modeS transponders. Also some aircraft are now required to fit ELT beacons, at yet more expense. Aviation fuel has more than doubled in cost, and the new regulatory regime has added more expense to an already overburdened sector. Your proposed charges will have a financial impact rather similar to straws on the camels back.

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 NOTHING to be gained, and much destruction possible in an industry already under severe stress.

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:

All the aviation frequencies are dedicated to the safety of human life. For gods sake that's their ONLY purpose. Without his radio a pilot is literally flying blind. How dare you think of charging for our lifeline.

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?:

Are you mad! Are you serious! You wish to deny access to vital safety information. Would you conduct an auction on the Titanic for the last lifeboat.? This proposal smacks of making money by risking peoples lives.

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?:

Business is for business, that is to say for making money. Aeronautical VHF is about safety, that is to say keeping people out of danger and saving lives

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 are no short or long tearm reasons for applying fees to aviation frequencies.

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:

Anyone using radar is likely to need the information provided for safety reasons. This is equally true for big jets and small planes.

If you charge fees, then the rich will use the service and live, the less rich will not use the service and some of them will die.

Again the liability issues around charging for access to safety related information could be a cause of concern for OFCOM.

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.:

We have been made to fit mode S transponders at great expense. If you then charge us to use them we will simply switch them off. The efficiency will then be zero. Regulators can do nothing if the regulated cease to co operate. £zero would be an appropriate rate.

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?:

NO

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?:

VOR and ADF frequencies are not much used by light aircraft. In the next few years these frequencies are likely to be used only by the airlines.

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

NO

Comments:

Charging for the use of aviation frequencies is a very dangerous idea. If it goes ahead people will die.