

Gosport and Fareham Inshore Rescue Service.

Independent Lifeboat and Rescue Service Since 1969.

Mr Ian Sweet (Vice Chairman – Strategic)

Response to the OFCOM Consultation: Applying spectrum pricing to the Maritime and Aeronautical sectors

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

Consultation by this method is fair provided all licence's are aware of the consultation, My Organisations first Information / awareness of this consultation was through the national news papers.

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.?

Ground station users with the principle aim of safety of life at sea or near to sea may through their area's of operation be placed in a high congestion banding thus diverting essential funds into licensing rather than on safety of life, this would affect many units along the southcoast where there are high commercial interests, and areas around major ports where frequency congestion is predominantly higher due to commercial operations.

For example, In Hampshire we have a major international container port, cruise liner port, oil refinery, multiple sailing and yacht clubs, Marine Towage and at least 5 harbour authorities, plus port authorities, this coupled with a two military ports, Cowes week indicates a higher level of commercial interest and involvement, than for example other area's which have little commercial interests or commercial viability.

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

None in the commercial context, as we are involved with safety of life at sea as a charitable organisation, from the safety point of view any interruption or failure to provide a swift and effective maritime rescue service, could have a commercial impact on the area as shipping maybe delayed, this could result from raised fee's allowing effective safety of life communications.

Question 4: Taking into account the information available in this document, including that set out in Annex 5, our initial views on VHF radio communications 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 radio communications, or for other uses

The financial implications that fee's would impose on some safety of life services due to their geographic locations would indicate that some services would be paying disproportionate amounts, money that would be better invested in safety of life would for some organisations then have to be diverted into licensing, endangering the very aim of the service and those who are in distress.

We are aware that the Mountain Rescue council of England & Wales and Mountain Rescue council of Scotland have recently been allocated some 23 frequencies within the maritime band and also some of the redundant midband police frequencies for land search and rescue presumably at no cost to these services (detailed in the UKSAR plan as published www.dft.gov.uk/transportforyou/uksar/)

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

We have no interest in Aircraft communications so cannot comment on this area.

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.

We consider that maritime SAR should be included within the UKSAR Plan and as per the MRC (E&W) and MRC (S) Maritime SAR should be allocated a block of frequencies that are controlled in a similar way to that of the Inland Rescue Teams, with a working group comprising representatives from the Various Marine SAR organisations, national standardisation within Land and Sea SAR Channels could then be co-ordinated and frequency planning, reusage from a specified block could be achieved with a relative low number of channels, by restricting this to 'declared facility' status services and those who provide for example lifesaving skills 'not for profit' such as the British Canoe Union Lifeguards, Surf life Saving Association, Royal Life Saving Association and National Coastwatch Institution would then benefit from a nationally coordinated approach in a similar way to the MRC(E&W) and MRC(S)

Currently we are aware that the following Channel's are utilised for Maritime SAR Activities (Listed as Channel ID's)

1640, 1858, 1860, 1870, 18082, 2560, 2928, 1928

We consider that the maritime rescue services should have the same adaptability of the land SAR Teams, and have a no fee or minimum fee for the essential service that they provide

Question 7: Do you agree that Ofcom should apply AIP to ground stations' use of maritime and aeronautical VHF radio communications 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?

Yes if the service is used for commercial gain, then AIP Should be applied, alternatives should also be considered with potential for the introduction of 12.5Khz channels on the UK Private marine channels to help relieve some of the congestions, within many current PMR Radios channels can be programmed as wide (25Khz) or narrow (12.5Khz) Channels, consideration to allow this type of radio to be used on UK Private Marine Channels would increase channels and reduce congestion in some area's.

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?

It is appropriate to consult on applying such a structure, as land based business has at present a financial deficit versus maritime and aeronautical users in terms of licensing fee's,

if the service is used to manage or operate a service for commercial gain the licence fee's should reflect this gain and usage of spectrum, for Safety of life or charitable usage not for charitable gain then the current structure is suitable.

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 as mentioned before there was to be a national maritime SAR Bandplan, then this would have been consulted and implemented a change at such a short notice may present problems for some organisations, for commercial organisations this would be sufficient to renew licences.

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

The usage radar by maritime rescue organisations is not as high as commercial interests but there are a number of stations that operate radar, the usage of radar for safety of life either commercially or for rescue purposes is essential and should not be discouraged by over pricing of spectrum, if commercial operations ceased to use radar due to licensing costs this would result in greater dangers in terms of safety, environmental issues, port management and public safety – prevention of terrorism and organised crime.

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.

No Comment

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 Comment

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?

We have no interest in aeronautical communications

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

We have no interest in aeronautical communications

Comments

We believe that a further look at UKSAR and specifically a national band plan for the maritime rescue services, providing use of spectrum specifically allocated to this is a potential way forward, with similar facilities that have been made available to the MRC (E&W) and MRC (S) such as the capabilities to cross link channels, repeater channels and data facilities, by looking at such a system, would potentially free up some of the UK Marine channels, provide a coordinated approach to Marine SAR, rather than the current system of

numerous rescue organisations working on an uncoordinated pattern of channels, that have previously been allocated on a localised basis.

In turn by coordination this increase's UK Resilience in times of National, Regional or Local emergency, and allows the maritime SAR to fall in line with other national organisations and become more coordinated, a prime example is that under the UKSAR (Land) band plan SAR Aircraft work with Land teams on one channel, but work on a differing channel for maritime SAR.