

**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?:**

As end users and owners of licensed airfields have little scope to determine what radio frequencies they use, agreements should first be made with EASA and the CAA to provide more flexibility in the use of aeronautical radio.

**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.?:**

It should be obvious that this proposal will impact upon safety as the only option that users have is to discontinue service. This comes at a time when the regulatory burden and its attendant costs to GA have never been higher.

Inevitably, these costs will be passed on to end users, some of whom will be obliged to declare themselves "non-radio"

An open frequency works well when everybody is using it but falls down when one or two are not in contact, forming a weak link in the chain.

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

As the UK is just about the most expensive country in the world to operate light aircraft, this can only make us less competitive and particularly force more pilot training to take place overseas.

The Americans will welcome this proposal.

**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 read this question four times and I still have no idea what it means!

**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:**

Any gains are likely to be taken up in enforcement costs.

**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 safety related radio aids should be free at the point of use.

**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?:**

No

**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?:**

No. These services are entirely safety-related.

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

Most businesses work on a 5 year plan. these increased costs have not been budgeted for

**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:**

Most users will see this as one step closer to taxing the air we breath. In a highly regulated environment there is always a 'final straw'.

Once a user feels unable to comply any longer and steps over the line, there is no going back and no point in complying with the 101 other 'statutory requirements'.

**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.:**

Any increase in cost is likely to reduce the already inadequate LARS service even further.

**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?:**

**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?:**

With more reliance on GPS, NDBs are disappearing fast. VOR beacons could be next if regulations permit.

**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:**

Better use could be made of frequencies as they exist if regulatory change could be made to permit this.

In particular, a UNICOM system such as that used in the USA would be helpful in the UK.

GA cannot afford more charges, therefore the 'law of diminishing returns' is likely to apply