

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 Mountain Rescue Teams are self funded charities, and are comprised entirely of volunteers who carry out life saving duties, then Ofcom should be taking advice from the MRTs as users before regulators and the government.

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.?:

Imposing costs on the use of radio channels for Mountain Rescue Teams would put both the casualty and the MRT members' safety at risk. Many of the smaller Mountain Rescue Teams simply cannot afford this extra cost alongside all the other more necessary costs incurred to run a Rescue Team safely. Therefore, some Teams may have to disband, which would increase the length of time before a casualty is located and treated by an MRT from further away.

Also, some teams may have to reduce the number of channels used which could compromise operations considerably due to channel interference.

In summary, the quality of casualty care will be reduced and in an extreme case a life may be lost.

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 do not have access to information which would allow me to comment on this statement.

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:

At present, the majority of money donated to Mountain Rescue Teams is hard won by active fundraising efforts by the same volunteers who spend many hours on the fells and mountains bringing people to safety. Therefore, it is obvious that if more money is needed to pay for radio channels then there is less time available to actually go out there and help people. Without the existence of voluntary Rescue Teams, the Government would have to spend resources on training the Police Force to carry out the same service which at present is free to everyone. Alternatively, rescues become a

chargable resource. Both alternatives would lead to a compromise to casualty care and are not the way forward.

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:

Yes

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:

There should be a discount fee for certain users. The purpose of Mountain Rescue Teams is to protect and preserve life, and to minimize the pain and suffering to the casualties whilst minimizing the dangers for the Team members. Therefore, MRTs (and other charities whose object is the safety of human life in an emergency) should have a 100% discount. Money paid on fees means less money available to help the casualties.

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?:

This is acceptable so long as it does not apply to any charity using channels for saving 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?:

It would be appropriate for those users who have a commercial gain from using maritime and aeronautical VHF communications. But not for Mountain Rescue Teams who work in remote areas where other networks are ineffectual.

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

The reasons are both short and long term. Mountain Rescue Teams are already suffering a decrease in donations, and having to pay for the use of radio channels would seriously compromise the ability to attend

call-outs. Health and safety of both Team members and casualties will be compromised, and lives may be put at risk.

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 am not qualified to comment on how fees should be apportioned. However, I believe no charge should be levied against users of distress beacons, as these are life saving devices.

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 am unable to comment on this.

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?:

There should be no fee for useage by life saving organisations.

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 facts to comment on congestion.

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 opinion

Comments:

The safety of human life should have more importance than fees. By charging fees for Mountain Rescue Teams to use radio channels. lives will be put at risk, both of the casualty and the Team member who is sometimes working alone in a remote, hostile area.