

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?:

Mountain rescue in the UK is run by volunteers. As volunteers we give a lot of time during both training and on operations. These operations frequently result in the saving of lives and quick transfer to hospital. This should be considered when apportioning fees.

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 safety of mountain rescue team members and casualties in the hills could be put at risk. If a team were unable to afford radio communications at the same level as currently available then these could prevent parties being able to communicate with each other effectively, and with other agencies who assist with the evacuation of casualties.

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

Not known.

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:

Voluntary organisation such as mountain rescue teams put in a lot of time to raise funds for essential equipment including technical hardware and radios. This equipment is essential to help save lives in the environments in which we operate. If the cost of using radios were to increase we would have to find additional funds, thus cutting down on money available for other life-saving equipment. The alternative would be to reduce the number of channels used, thereby reducing our ability to operate safely on the hill.

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:

Yes. I believe that voluntary organisations whose objective is to save lives should be given 100% discount. This will help ensure our casualties continue to receive the high standard of professional care we currently provide.

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 sounds fair when we are not considering life saving activities. As mentioned above I do not believe organisations participating in essential life saving activities should be charged.

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?:

If the channel is being used commercially I do not have an issue, however I do not believe charitable organisations operating to save lives should have to pay the fee.

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

I do not believe Mountain Rescue (and Search and Rescue in general) should be required to pay these fees.

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 do not believe there should be a charge to search and rescue teams using these 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.:

As mentioned previously I do not believe this fee can be reasonably applied to organisations carrying out life-saving activities.

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 believe this should only apply to commercial use.

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?:

Not known

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

Not known

Comments:

I believe that search and rescue in the UK is a valuable life-saving activity which is greatly aided by good communications.

Reduced communication could lead to difficulties locating and extracting casualties, thus leading to increased pain for the casualty. It could also seriously affect the safety of team members.

I would urge you to re-consider applying these fees to search & rescue organisations.