

**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?:**

Key current stakeholders such as RNLI, Mountain Rescue, etc should have the primary voice in any negotiation along with their key customers the main emergency services (Police & Ambulance Services).

**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.?:**

Any charges or degradation in bandwidth against charitable emergency services will put lives at risk.

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

Any additional charges will have a detrimental impact against competitiveness. The balance here is between generating income for the Treasury and charging businesses for use of a public asset. Special dispensation needs to be considered for 'small' and 'occasional' service users. A blanket annual fee may well prove too expensive to such service users and force them out of business.

**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:**

Any charges or degradation in bandwidth against charitable emergency services will put lives at risk.

**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:**

Again any small or occasional service user must be considered in the process. Charging may well prove inefficient across some market areas.

**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:**

Charity "Emergency Services" should be given free access to required frequencies in perpetuity. The taxing of these bodies is a crime against society itself.

**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?:**

Systems that emergency services use should be exempt from any charging or bandwidth restrictions (within reason).

**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?:**

Charging must only be made against commercial operations.

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

Not to my knowledge. Any charging system put in place at such 'short' notice should be fully refundable in the event that unforeseen consequences occur. i.e. any generated income should be banked for a period of time until the full nature of the charging system is understood.

**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:**

Systems that emergency services use should be exempt from any charging or bandwidth restrictions (within reason).

**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.:**

Systems that emergency services use should be exempt from any charging or bandwidth restrictions (within reason).

**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?:**

Systems that emergency services use should be exempt from any charging or bandwidth restrictions (within reason).

**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?:**

No comment

**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 comment

**Comments:**