

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?:

After the initial consultation process and when all responses have been collated, further consultation should take place on the pricing regime. The process should be overseen by an independent arbiter who should also be empowered to deal with appeals and complaints

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.?:

Airports will be tempted on financial grounds to minimise the use and number of VHF channels used in communications and navigational aids. For example, airports may use HF NDBs rather than VORs, ILS and other navigational aids. These measures could have a significant impact on Flight Safety. Air Traffic Control frequency congestion may also result if the number of VHF frequencies used for radio telephony are reduced and consequently become cluttered.

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

AIP charges would be passed from airports to operators and eventually down to the ticket price for the travelling public. As prices rise, the numbers of aircraft operators and passengers may reduce and our Airports would be less competitive.

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:

My organisation provides lifeline air services to remote communities and is already heavily subsidised by the Scottish Government. The AIP charges would increase our deficit by over £1 million pounds and this would need to be recouped from the Scottish Government or the UK tax payer

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 for charities. Many of my organisations operations are in support of Air Ambulances and Search and Rescue operations, but the same infrastructure and VHF frequencies are required for our commercial operations.

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. The current Licence fees and frequency allocation system in use for aeronautical frequencies adequately manages this matter.

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?:

We agree to the existing Business Radio Licence system

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

Recent high fuel prices have led to a decrease in aircraft operations with reduced aircraft services and passengers

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 size and commercial viability of stakeholders should be taken into account

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. Any charge is a disincentive to providing radar services with the consequent possible degrading of Flight Safety. See also Question 10 response.

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. Any charge is a disincentive to providing radar services with the consequent possible degrading of Flight Safety. See also Question 10 response.

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?:

Yes. The development of .833MHz channel spacing has already increased the number of VHF frequencies available

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. It appears that aeronautical and maritime AIP has been seen as a cash cow to raise funds similar to those raised by OFCOM selling spectrum to Mobile phone operators.

Comments: