

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?:

I think Mountain Rescue and Search and Rescue services which are charitable organisations, should be given special consideration compared with commercial organisations.

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.?:

If mountain rescue teams shared their frequencies with other organisations, then it is possible there could be co -channel interference, and lack of good communication, which is essential for efficient SAR management, and vital for team member safety.

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

It is possible that not all channels are being fully utilised within the uk.

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:

It is possible that smaller Mountain Rescue Organisations could not meet the costs, and therefore their viability and availability for rescues could be at risk. The RNLI has been in the press recently as struggling to meet costs in the present competitive climate, they have limited funds, and could be compromised as a life saving agency.

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 think that there should be a full discount for all life saving organisations. Search and Rescue channels should be retained for full and efficient SAR management, for the preservation and protection of life.

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?:

Providing it is not applied to life saving activities of charitable status.

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?:

I think maritime and aeronautical VHF communications should be strictly controlled, and a fee structure applied appropriate to commercial gain.

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

No fees should be applied to Search and Rescue Operations. Otherwise they would collapse.

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:

If the beacons are of the distress Sarsat EPIRB or PLB variety then no charges should be applied as they are life saving devices, used by SAR organisations.

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.:

Rates should be provided only for those organisations involved in commercial gain.

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?:

If this spectrum is used by any life saving agency, no.

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 idea of congestion levels

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

I am not able to answer this question, as I do not know how Ofcom arrived at its reference rates.

Comments:

I think, if License fees are applied to voluntary SAR organisations, then lives would be put at risk with increased costs. Health and Safety would be compromised. The Protection and Preservation of life is utmost.