

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?:

With regard to the aeronautical sector you need to: 1. conduct and publish a risk assessment on your proposals
2. pay particular attention to responses from associations representing general aviation.

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.?:

Most definitely yes; there will be a very large impact on safety. Radio and radar are there to make flying safe and efficient. Making small airfields pay will mean a large number will either be unable to afford it or will pass the cost on to the user. In either event less coverage will result.

When I fly into an airfield I listen out to others making calls and construct a positioning map in my mind of where other aircraft are so that I may avoid them. In the absence of radio calls I will be unaware of other aircraft and thus the risk of hitting another aircraft is much increased particularly at times when visibility is poor which has been the case for most of this summer. Also, if say I'm flying IMC (i.e in cloud) and want to contact a small airfield to establish whether it is safe to let down over them if they haven't got a radio then I am unable to do this and will not know if other aircraft are in the circuit.

If general aviation has less use of radar and radio then a reduced situational awareness will be available and the risk of a light aircraft entering controlled airspace and hitting an airliner with the most terrible consequences will increase.

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

As the cost is likely to be passed to the user (whether by increased landing fees or similar) then this will make us less competitive as it will cost the user more. In some cases it will cause unemployment as radio bases who are unable to afford the cost will close down. If there are more accidents due to less radio and radar then the cost will be in human life, police, fire and NHS costs.

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:

The costs are far too high for small airfields and will mean many will not be able to afford them and thus will have a detrimental impact on safety - see Q2.

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 and also discount for small airfields - i.e any airfield not used by licensed airlines.

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 - see above

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?:

No - see above

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

Long term ones - i.e. safety

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:

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.:

See above

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?:

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 and no to the second part.

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

Comments:

Sory to be so negative but I honestly think more people will die if you start charging the "small " user for aeronautical services. I am not connected with any airfield and am just a private pilot.