

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?:

All Mountain rescue and Search and rescue teams should be allowed to contribute. We are all volunteers and rely on donations from the public. We can not afford any increase in costs for our life saving activities

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.?:

There is no doubt that any increase in costs to volunteer rescue organisations (MR/SAR) will have a detrimental effect on their ability to operate. The safety of both the casualties and the volunteers who give their time to assist them would be put at great risk.
Contact the MRC

or for North Wales team MREW
<http://www.mountain.rescue.org.uk/>

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 I understand it the full range of frequencies is underused.

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:

As volunteers, MR and SAR teams spend a great deal of time raising funds. This money is hard won and is vital to keep the teams running. The impact of not having these funds available if we have to pay for frequencies is a significant number of lives will be put at risk. The number of casualties is increasing year on year and this would further stretch the volunteer teams resulting in a much reduced service.

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:

Given that life saving MR/SAR teams are fully staffed by volunteers there should be a 100% discount for them.

Without the use of the frequencies due to cost constraints many teams would not be able to operate efficiently resulting in greater loss 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?:

As long as the frequencies are not for the use of volunteer life saving agencies Within North Wales and I am sure other regions, a huge amount of work has been carried out by volunteers to ensure we use the current frequencies effectively.

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 that this should only be applied to those organisations that receive government funding and can thus afford the charges.

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

That is a very short time scale to impose fees on volunteer life saving agencies. I would like to see no charges for these teams

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:

This is something I can not comment on.

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.:

I think that this should only be applied to those organisations that receive government funding and can thus afford the charges.

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 think that this should only be applied to those organisations that receive government funding and can thus afford the charges.

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 can not comment as not involved in this area of activities.

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 can not comment as not involved in this area of activities.

Comments:

If volunteer rescue organisations are asked to pay for frequencies there will be a significant risk to life both for the volunteer rescuers and the casualties they aim to assist

These volunteer teams can not afford to pay these charges.