

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?:

Don't charge the fees, then you won't need to apportion them.

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.?:

Glider pilots do not have to use radio but do so for safety purposes. They will stop doing so if there are charges.

Gliding clubs cannot afford the vast ground station charges suggested. They will have to give up dedicated frequencies and use common ones at a material detriment to safety, especially with regard to interference with "STOP" signals when winch and aerotow launching.

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

Come here and pay
Go there and don't pay.

What more do you need?

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 club exists on a break-even situation, on average. We are struggling to keep control of ever increasing costs. This would push us materially into the red or force higher membership fees which leads to membership numbers falling which leads to higher membership fees to cover fixed costs etc etc. A deadly spiral.

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:

Not discount, remove.

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?:

Charging is not a suitable method of control. It merely concentrates the spectrum in the hands of those with most money. In airline terms it favours the large carrier against the small independent.

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?:

Business Radio is a commercial situation. Where radio is the core business, it is a core and expected expense and where radio is merely a commercial convenience there is the choice to use it or not. Aviation and maritime use is safety critical. It is all about keeping people safe. Ask the CAA. They have been pushing for universal transponder use for years.

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

It's an inappropriate cost at any time.

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.:

Price is an inappropriate method of allocation in any event. If you are convinced that it is, you should covenant the entire take to charity. Then we might believe that you are not just trying to raise money for your own and government purposes.

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

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. Air traffic is REDUCING rapidly at present. Reference to studies carried out several years ago before oil price rises and global recession indicating continuing growth are totally meaningless.

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:

No No No No No No.
Don't do it!