

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?:

The British Gliding Association (BGA) has responded on behalf of the UK's glider pilots and gliding clubs.

I do not propose to duplicate their response. Suffice to say that I support it in respect to all of the sections below. I will only expand on it where necessary.

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.?:

I am a member of the Yorkshire Gliding Club. Costs have escalated recently due to fuel (for towplanes) and extra EU regulation (EASA). The club is currently at a big annual deficit, with reserves getting low. Cost cutting is the order of the day. Any significant ground station charge will mean that the club simply stops using one.

There is no mandatory requirement for a ground station, since there is no air traffic control. Radio is mainly used to announce intentions (particularly landing circuit plans) between aircraft operating from the airfield. The ground station is used almost entirely for listening.

Occasionally, however, a ground station (if anyone is actually listening, which is not always the case) is useful to a glider pilot for safety reasons. Checking the local cloudbase and weather conditions when returning from some distance away is one example.

Big charges for such rare usage is unfair. The charges for sport aviation should be discounted to zero to avoid reductions in 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?:

See BGA response.

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:

See answer to 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:

See BGA response.

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:

See answer to Q2

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?:

See BGA response.

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?:

See BGA response.

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

See BGA response.

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:

See BGA response.

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 BGA 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?:

See BGA 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?:

See BGA response.

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

See BGA response.

Comments:

The proposal does not take into account the situation of sport aviation clubs, and needs to do so.

Imposition of ground station charge would lead to us to stop using one, with an impact on safety.