

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 highest priority of consideration should be given to emergency services users such as Mountain Rescue Teams (MRTs). MRTs are all registered charities which perform an essential 24/7/365 life-saving role in both mountain and non-mountain environments. They provide expert assistance and support to the Police, the Ambulance Service the Fire Service, HM Coastguard and, on occasions, the Military. MRTs also have an essential role in the National Emergency Plan. In England & Wales. There is no Government or other funding of MRTs from the public purse. They can only exist through the generosity of charitable donations and, indeed, on the very significant commitment of the volunteers who provide the service.

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.?:

An efficient and effective radio communications system is essential to both the effectiveness of the services provided by MRTs and the safety of MRT personnel. Any reduction in the number of channels available to MRTs or any further sharing of them would undoubtedly compromise effectiveness and safety, particularly during multi-agency emergencies such as flooding, train crashes and air crashes.

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

No evidence.

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:

In the case of many MRTs, annual running costs of between £40K and £50K have to be collected by "bucket rattling", etc. The purchase of major items such as specialist vehicles has to be funded on top of this. Any charging for ground stations within Mountain Rescue could well make the funding of the service impossible. It would be interesting to see how the Government would then provide an effective equivalent service and how much it would cost!

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. There should be no charge whatsoever for charitable life-saving organisations such as MRTs. Charitable donations from the public are given to directly support the essential work of the Teams. It would be immoral for further money to be extracted from the charities by the Government in this way.

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 that life-saving organisations such as MRTs are not charged or affected.

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?:

Providing that life-saving organisations such as MRTs are not charged or affected.

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

Life-saving organisations such as MRTs should not be charged or affected for the reasons given above.

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:

Life-saving organisations such as MRTs should not be charged or affected for the reasons given above.

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.:

Life-saving organisations such as MRTs should not be charged or affected for the reasons given above. Charges should only be levied on commercial users.

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?:

Life-saving organisations such as MRTs should not be charged or affected for the reasons given above. Charges should only be levied on commercial users.

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?:

Not aware.

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 opinion.

Comments:

The Ofcom proposals have the potential to put lives at risk and to cripple MRTs financially. These essential services are provided by unpaid volunteers who give up an enormous proportion of their time to not only carry out life-saving operations but also fundraising, maintaining equipment, maintaining vehicles and training (including advanced casualty care training).