

**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?:**

As a voluntary mountain rescue team we were initially concerned at the prospect being muted that we would have to pay large fees to use our radios for mountain rescue incidents. We have no business advantage from using the allocated radio channel, and only use it for helping people in distress, and the health and safety of our own members. As a user charitable organisations should through their representative bodies e.g Mountain rescue Committee of Scotland be involved in the management process. However we take comfort that you say there is no proposal to impose charges on Mountain Rescue Teams.

**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.?:**

Mountain Rescue Team funds are very limited and based on donations. We would not be in a position to pay for the channels allocated as part of the UKSAR bandplan. We are of the view it would be discriminatory to charge for ground based stations when you are not charging for maritime stations.

We operate in areas with no mobile phone signal, Emergency services airwave does not operate. We rely on our back to back radios to safely work as a team, often in dangerous conditions in poor visibility when effecting a rescue. We also need radio contact with military SAR helicopters. Radios are vital to meet the Health and safety requirements of our members and those in distress on the mountains.

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

Our radios are not used for commercial reasons. Only life saving emergencies in remote areas where the emergency services cannot reach and rely on mountain rescue team skills to carry out a life saving role. The UK SAR bandplan is available for major civil emergencies. There is one incident already where the emergency services airwave failed due to major flooding and the bandplan radios were the only effective communication link.

**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:**

If the costing is accurate we would not be able to fund the licence fee and would lose the vital resource of the bandplan radios. We are not in a position to compete with businesses who can offset their radio costs within their revenue costs of running the business. We would lose the ability to contact SAR helicopters, and other emergency services when operating in the mountain environment. People would die as we could not get the necessary assistance to them in time.

**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. Voluntary and charitable organisations that provide a life saving service. e.g RNLI, inshore rescue. Mountain Rescue. These organisations comprise volunteers who give up their time without payment for the public good, and save many lives each year, and recover many people in distress at sea or on land. They save the taxpayer large sums of money by providing a volunteer on call service.

**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?:**

We understand that the spectrum is limited. However the saving of life and providing assistance to persons in distress should take priority and no charges levied. Charging should only be applied where the applicant is running a business and not to any voluntary organisation which is supported by the emergency services to assist them in rescue work on land or sea.

**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. Rescue Teams are allocated channels under the UK SAR bandplan. This is to provide communications for the public good in an emergency and should not be charged for. Where marine and aviation channels are used in connection with business activity it may be valid, but not worth the administration costs of doing so.

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

We would not be in a financial position to pay the fees and our ability to operate would be compromised.

**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:**

No comment

**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.:**

No fees should be payable to Voluntary Search and Rescue organisations using the UK SAR bandplan.

**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 comment

**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?:**

No comment

**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 comment

### **Comments:**

The provision of Search and Rescue in the UK would be severely compromised if charging was imposed on voluntary search and rescue organisations. The Health and Safety of the volunteers would be affected and persons in distress would be put at

serious risk if we were not able to fund the prohibitive costs of the licence fee required to use our UK SAR bandwidth radios. vital for efficient rescue activity