

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?:

You should set up an internal working group to look at the whole subject.

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.?:

Major impact on safety and volunteer organisations such as Mountain Rescue Teams

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

Once you start charging, prices only go one way which is upwards. This could impact on small organisations especially those who are voluntary.

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:

Impact on organisations having to purchase new radio equipment or convert existing equipment if and when the frequencies are changed.

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:

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:

Most definitely YES

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?:

NO

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 believe it would be difficult to police these proposals once put in place. In addition I can see the possibility of personnel having accidents or emergencies and not having communications.

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

I am not in favour of the pricing

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:

as 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.:

Just like speed cameras, they never seem to reduce the amount of accidents they only seem to increase the revenue from charges/fines

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?:

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:

I am a member of a mountain rescue team. We operate with minimal funding and contributions. An essential part of our trade is to effectively communicate in order to carry out our tasks safely and efficiently. Radio equipment is already expensive and the intended spectrum pricing to the Maritime and Aeronautical sectors will only make our already limited funds even more stretched. Furthermore, if frequencies are changed this will more than likely require new radio equipment to be purchased across our entire organisation which again comes down to more expenditure. It is essential that we have an effective communications architecture in order to pass vital information between ourselves, other MR teams, Police and other emergency services in particular direct and compatible communications with the SAR helicopters of the RN, RAF and HM Coastguard. The terrain we operate in is often outside the mobile telephone and Airwave/Tetra networks. Progress by definition is taking something like technology and making it better. I also believe that safety should come before profit and that voluntary and public safety organisations such as ourselves should be given discounted or even waived rates due to the nature of our business. If this proposal is implemented I can see that due to the cost of replacement equipment with limited funds that a far more fragile communications architecture will be forced upon us. I do not class this as progress.