

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?:

A list of representatives from all stakeholders should be maintained and input requested from this list.

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.?:

ALSAR's members use the frequencies in question to coordinate searches for vulnerable missing persons, and provides reliable communication should a team member become ill or injured.

The availability of multiple channels allows teams to effectively have exclusive use of a frequency during safety critical operations.

If frequencies carried a significant cost then teams would probably have to reduce the number of frequencies licensed (most are charities), meaning a greater possibility of interference and consequent interruption of safety-critical messages.

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

ALSAR has no input on this question.

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:

ALSAR does not have an opinion on spectrum pricing for commercial users; our interest is specifically the voluntary SAR community. Our members operate on limited budgets and any significant charges for frequencies could result in a reduction in the services that they provide.

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:

ALSAR does not use aircraft licenses and therefore has no comment on this issue.

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:

Obviously yes. Charities represented by the RNLI, Mountain Rescue and ALSAR etc. provide a valuable function that would otherwise have to be provided, at least in part, by government and the tax payer. They should be supported in this role.

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?:

The mechanism for spectrum allocation is not the issue. The important issue is that, at the end of the day, volunteer Search & Rescue organisations can access sufficient relatively interference-free VHF channels to do their jobs, at as lower cost as possible (preferably free).

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?:

Again the exact pricing structure is not the critical issue from ALSAR's point of view, provided that volunteer SAR users are not priced-out of their safety-critical VHF frequencies.

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

Only if the charging structure meant that Mountain Rescue and ALSAR teams needed to change the frequencies that they are currently using (for any reason). If this is the case then more time would be needed for teams to reprogram existing equipment to the new frequencies.

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:

ALSAR has no input on this issue.

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.:

ALSAR has no input on this issue.

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?:

ALSAR has no input on this issue.

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?:

ALSAR does not use aircraft licenses and therefore has no comment on this issue.

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

ALSAR does not use aircraft licenses and therefore has no comment on this issue.

Comments:

Most ALSAR teams survive on very low budgets but provide an invaluable service to the public that is not - and is unlikely ever to be - provided by the police. Adding any significant cost to what is our most essential and safety critical tool can only reduce the level of service provided to the community.