

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 member of Moffat Mountain Rescue Team I consider that the voice of all the Mountain Rescue Teams, most of which are voluntary, should have a high priority in the consultation

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.?:

Moffat MRT makes use of the UK SAR Band Plan and we have channels for team use, communications with other teams, communications with military and civilian helicopters, coastguard and repeater channels. It costs about £17,000 to run the team and we struggle financially to raise this. If radio use costs increase we would have to make cuts somewhere (I suspect that raising money will become more difficult in these times of financial crisis). Such cuts would be detrimental to 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?:

I do not see how allocating some of the VHF spectrum to Mountain Rescue Teams, at no cost, would detrimentally affect UK competitiveness. If Mountain Rescue Teams became less effective, this could detrimentally affect tourist income.

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:

It costs about £17,000 to run the Moffat rescue Team. Some money is given by the Scottish Executive and we struggle to raise the balance (more than half). If radio use costs increase we would have to make cuts somewhere (I suspect that raising money will become more difficult in these times of financial crisis). All the money we raise comes from public donation. If the public see that they are giving us money to pay for a Government licence I suspect there will be another outcry!

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:

Not Applicable

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 - Mountain rescue teams should get 100% discount. We are charities manned by volunteers who spend our time on rescues , training and raising money to cover our present costs.

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?:

Only where the spectrum is not being used for rescue situations or in training

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 think that businesses are better able to pay if required.
Voluntary rescue services should not have to pay at all.

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 above. Voluntary rescue services should not have to pay.

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.:

Voluntary rescue services should not have to pay at all.

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:

I hope I have made my opinion clear. It is not acceptable to raise the running costs for Mountain Rescue Teams in this manner. These communications should have no charge for use by Mountain Rescue Teams (and other voluntary rescue organisations). We have to contend with increased costs such as fuel in times where raising money is becoming more difficult and such a proposal is not acceptable.