

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 needs of all voluntary SAR including Mountain rescue should take precedence over all commercial sectors as they are charitable organisations.

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.?:

Both the safety of members of the public and members of SAR teams would be put at risk due to the limited amount of channels available and lack of funding.

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

Yes a large amount of analyses of spectrum usage has shown that a large number of channels are not fully utilised.

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:

The resources of all the voluntary SAR teams need to be spent on relevant life saving equipment. Any extra demands on this funding would directly result in an increase in risk to life.

It would be immoral to charge these voluntary teams who are already over stretched by the increasing demands on them and in fact more items should be given freely to them.

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:

As all voluntary organisations should not be charged I would say that they should have a discount in the region of 100%

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?:

If this is not for life saving activities then yes but it should be noted that SAR use of the channels is already as efficient as possible.

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?:

Yes but only for that which is used for commercial gain.

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

Once again I would state that ALL SAR operations should not be charged.

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:

The SAR organisations are not directly involved in these areas of radar or beacons. If the beacons are of the distress variety then I believe that no charge should be brought against voluntary SAR agencies.

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.:

Only for those used for commercial gain.

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?:

Not if it is used for life saving activities

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?:

As I have no knowledge of the level of congestion I am unable to answer that.

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

As this is not connected to SAR activities I have no opinion on this.

Comments:

Safety of human life should always be the most important thing and commercial interest should NEVER come into it.

As a government body who is saved millions of pounds per year by voluntary organisations you should be considering donating funding to SAR rather than charging.