

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 Radio Officer for the Ochils MRT, I would like OFCOM to recognise the needs and constraints of non-commercial users, in particular the voluntary civilian bodies such as the Mountain Search & Rescue teams that are part of UKSAR. In common with the other UK teams we are also a registered charity.

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.?:

I have been a voluntary MR Team member for almost 40 years. I recall the time when civilian teams did not have radios, making searches and rescues long, inflexible and potentially dangerous. It is only relatively recently that the UKSAR band plan has been established to give us a "fit for purpose" comms system. I am concerned that AIP could impose financial constraints on volunteer Teams and compromise access to the full UKSAR Band Plan. We regularly work in areas where there is poor or no mobile phone coverage and rely on the Band Plan for comms. Without full access, safety is likely to be compromised.

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 understand that the channels we currently use form a very small part of the spectrum and consequently any impact on UK competitiveness should also be small. Also, due to its voluntary nature, UK civilian mountain search and rescue in its current form represents good "value for money" to the UK government.

In this context, it is perhaps worthwhile pointing out that the term "Mountain Rescue Team" is a bit of an historical anomaly. Increasingly we are called out by the Police for non-mountain incidents, particularly to search for vulnerable people in large or difficult rural and semi-rural areas.

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:

As voluntary body, we, along with other Mountain Search & Rescue teams, are not legally bound by Health & Safety legislation. However all teams affiliated to the Mountain Rescue Committee of Scotland have recently established H & S systems that would comply with the legislation. This has resulted in a large increase in annual expenditure. As well as more safety equipment being purchased it has to be replaced at greater frequency than previously, putting a lot of pressure on the team's budget. In Scotland, this has been partially alleviated by a grant from the Scottish Executive (subject to annual review), but AIP will impose further strain on budgets.

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:

N/A

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:

Absolutely "yes", to both questions. As part of our on-going fund-raising, Team members give talks to local groups. From these talks it is clear that there is a widespread perception in the public at large that Mountain Search & Rescue is wholly funded by the Government. When we rectify this perception, the public response is magnificent, but it remains an impediment to fund raising. The imposition of AIP will only add to the confusion, to the detriment of our finances.

I also believe that the public who donate to emergency-service charities with life-saving objectives would not support the imposition of charges by the UK Government.

I support the 100% discount proposed by the Mountain Rescue Committee of Scotland.

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?:

Not in the case of use for rescue and safety-related activities

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 don't regard this question as relevant to our activities in Search and Rescue

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

Apart from the arguments already advanced, the imposition of fees at such short notice are likely to have significant adverse cash-flow implications for us.

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 views on this

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.:

The argument against charging has already been stated. No further comments

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?:

Currently this has no relevance to us.

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?:

N/A

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

N/A

Comments:

I endorse the feeling of surprise expressed by other respondents that the issue of charging charitable bodies involved in voluntary search and rescue should been considered in the first place.

On a very personal level, I have lost good colleagues in S & R over the years, and I feel strongly that being asked to pay for the basic requirement of communicating is a slur on their memory