

**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?:**

By gathering as much relevant information as possible from the parties potentially most effected.

ie Voluntary and Charitable organisations working in the emergency/life saving arena.

**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.?:**

Put simply, we have a certain duty of care to all our team members deployed on an incident, not to mention the casualty or missing person.

An effective radio net is an essential part of this since communications are necessary in order to effectively what can be a rapidly developing and fluid situation.

Searches in wilderness areas can and do require frequent updates to search parties, so that they can work effectively towards the ultimate goal, ie finding the missing person. Speed can often be of the essence, especially in winter or indeed in foul weather and in these cases it is also important to be able to rapidly recall teams when the person has been found, since any further exposure to the elements would be of a needless risk.

We have developed within Mountain Rescue over the years what is now an effective and efficient range of channels available. Cross team interference is now almost a thing of the past and indeed we now have the ability to tune our sets in order to work with other teams outwith our area.

This final point is particularly relevant in large multi-team searches where communication can and is of the essence.

Increased costs would inevitably result in a reduction of channels used which would result in a lack of efficiency, airwave congestion and ultimately PUT LIVES AT RISK.

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

Competitiveness IS NOT an issue here.

Saving and protecting life in remote areas and in often extremely inclement weather IS.

**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:**

Most teams operate on a hand to mouth basis, covering their expences with charitable donations.

What is proposed here would be nothing short of disasterous from a financial point of view

**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:**

Most Emphatically Yes!!!

In fact, should any fee be charged?

Or to put it another way, 100% discount would be more appropriate

**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?:**

Would this effect Search and Rescue?

If so, then 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?:**

We are not in a profit making or competitave business.

Our "business" is that of saving lives and of ensuring the safety of our team members in what are more often than not hazerdeous conditions.

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

Let's talk this thing through rationally before crippling teams whose sole source of funding is from charitable donations, and who tend in the whole to operate on a shoestring

**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:**

Not applicable

**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.:**

Not applicable

**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 applicable

**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?:**

Not applicable

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

Not applicable

**Comments:**

Life, Health and Safety, both of casualty, individual (lone) team members and teams as a whole MUST take precedence over any price increases.