

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?:

Use of the Cabinet Office guidelines on consultations I consider to be the best practice.

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.?:

Small and medium sized aerodromes and airfields would be forced to forgo the use of VHF communications so placing at risk, aircraft and ground vehicles. Basic air traffic and airfield information will be unavailable to pilots through radio communications thus the risk will increase to transiting, departing and arriving air traffic.

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

Following on from above If charging increases risk operations in the UK will become less safe forcing operators to relocate elsewhere in the EEC where the authorities have a more favourable attitude.

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:

Since the model is proposed for the whole of UK Airspace the CAA are best equipped to deal with a coverage model based on range of use and coverage areas.

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:

Aircraft WT Licences are currently charged for by the CAA on behalf of OFCOM. This I consider to be unnecessary as no charge is made to shipping for what is the same thing. These charges are just a revenue gathering exercise and should be abolished.

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:

Where communications are used to ensure the safety of life there should be no charge. Like wise what is the point of giving to a charity if donations then go via a TAX to OFCOM then onto H.M. Government. Charities should thus be exempt.

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 aeronautical frequencies are protected by International treaty. Since OFCOM has no remit outside the UK it cannot charge elsewhere. So users in the Eire, Isle of Man, Channel Islands, near EEC countries can continue as present causing interference to UK mainland channels to which the operators are being TAXED to use!

In this instance Professor Cave noted this point and assessed that the cost benefit is ZERO !

Why are OFCOM then trying to charge for something which has been shown to be valueless ?

THIS IS A REVENUE TRAWL FOR TAX AND NOTHING ELSE !

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 most strongly disagree with the OFCOM proposals, Charging is totally inappropriate in these cases. It is a revenue gathering exercise and a tax on the safety of Human Life.

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

The policy should not be introduced at any time.
Thus introduction should not be at any Time.

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 opinion

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.:

No opinion

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 opinion

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 opinion

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 opinion

Comments:

This proposal as shown above is just a revenue gathering exercise for HM Government and not in any way a proposal to improve spectrum management . In fact OFCOM are being rather underhand in these proposals by implying otherwise.