

## Cover sheet for response to an Ofcom consultation

### BASIC DETAILS

Consultation title: *APPLYING SPECTRUM PRICING TO MARITIME & AERONAUTICAL SECTORS.*

To (Ofcom contact): *MICHAEL RICHARDSON*

Name of respondent: *MICHAEL LITTLE*

Representing (self or organisation/s): *RADARMOB LTD. WELLESBOURNE AIRFIELD*

Address (if not received by email): *WELLESBOURNE, WARWICK, CV35 9EU.*

### CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing	<input checked="" type="checkbox"/>	Name/contact details/job title	<input type="checkbox"/>
Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?	

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

### DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here. ☒

Name *MICHAEL LITTLE* Signed (if hard copy) *M. J. Little*

## **Response to OFCOM consultation on AIP application to Aeronautical Sector**

### **Question 1**

To lead the response list with a question on how the fee should be apportioned suggests that the decision has already been made to apply pricing. This ensures the stakeholders' doubts as to the value of the consultation exercise in the first place.

### **Question 2**

Pricing ground station users will undoubtedly affect safety. At present small aerodromes have a choice whether or not to offer a radio based service to pilots. Such a service is provided with the approval of the Regulator in order to ensure a level of safety which complies with national and international (ICAO) standards. The introduction of spectrum pricing on top of all other regulatory charges will have the same effect as in any business, i.e. the value of the service will be questioned and for some the charge will be the deciding factor on whether or not to continue with a radio based service.

### **Question 3**

A considerable proportion of spectrum users are public sector bodies, MOD, NATS, police etc. The collection of vast amounts of spectrum fees from such bodies, with no practical service or product offered in exchange, is merely movement of revenue around the public sector. This is added beurocracy not UK competitiveness. There are already known financial benefits from using flying training schools outside UK, this proposal will increase those benefits

### **Question 4**

The suggested rates are far in excess of any cost incurred in allocation of spectrum space. There is no logical basis for such figures apart from increased revenue to the state. Because of this, no affected spectrum user can agree that the scale of fees is justified.

### **Question 5**

There is no economic efficiency in charging AIP to either aircraft or ground based radio users.

### **Question 6**

How can the "safety of human life in an emergency" be defined?. Does the ambulance qualify for a discount only if the patient in the back takes a turn for the worst? The aviation industry use of radio is wholly based on safety considerations, does it apply for a discount based on the number of emergencies it handled?

### **Question 7**

Spectrum congestion has always been managed by technical innovation. Allocation of frequencies has always been efficiently and economically conducted without any evidence of unreasonable cost to the body involved. Congestion arises from increased demand, financial penalties for avoiding congestion will result in congestion remaining unresolved because the user, for the first time, is having to consider the cost of an extra frequency.

Question 8

Business radio licences are by definition a business tool with financial benefits attached. Maritime and Aeronautical radio frequencies are safety requirements, not optional extras to increase profit, and should be treated as such.

Question 9

If OFCOM are serious in their intentions to fully evaluate the results of this consultation there should be at least twelve months between the end of the consultation period and the introduction of charges.

Question 10

Individual users of radar will immediately see the advantage of using one radar to serve several aerodromes. This factor will provide major problems for the Regulator who will have to evaluate safety management against proposals to withdraw radar and revert to procedural control services.

Question 11

The only body who can answer this question is the Regulator. The CAA will be aware of national requirements under the European Single Sky Agreement and the licence which governs NATS responsibility in this area. Financial considerations in allocation of radar spectrum will not be welcomed in an area where UK is taking the lead in adoption of Functional Airspace Blocks in which blanket radar coverage is assumed in international agreements.

Question 12

As for question 11

Question 13

The radio navigation aid spectrum is uncongested and will become more uncongested in the near future. Over the next twenty years all existing radio navaids will be replaced by area navigation based on satellite positioning systems. Airport landing aids will also be replaced by GPS approach systems. This is already the position in USA and trials have been successfully completed at several UK airports. This conversion to satellite systems has been approved by ICAO and there are now no barriers to the gradual conversion in the UK.

Question 14

No, any imposition of pricing on radionavigation aids will merely hasten the withdrawal of these aids.

M. J. Littler  
Manager  
Wellesbourne Mountford Airport  
Warwick  
CV35 9EU