

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?:

A number of emergency service organisations (e.g. RNLI and Mountain Rescue) make use of some marine band frequencies as part of life saving operations. The vast majority of these organisations rely on charitable donations and are operated not for profit. Any process must ensure that these organisation's views are truly represented and must never consider raising money as being more important than life saving operations.

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.?:

Mountain Rescue and RNLI are users of Marine Band - any additional costs passed on to organisations such as these will have an adverse impact on operational effectiveness and place significant additional risk on casualties and rescuers.

These organisations rely almost wholly on charitable donation and every pound spent on dealing and paying for these proposals would mean a pound that is not available for a casualty/rescuer.

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, organisations that provide life saving services minimise the risk to users of different environments. Both leisure and professional activities require the use of emergency services - if they are not readily available then these activities will be restricted (e.g. fewer tourists to the mountains or sea).

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:

Charging fees, even at low levels, will very severely impact life saving organisations such as Mountain Rescue and the RNLI. As charitable organisations every effort is made to ensure the best quality of life saving service is maintained, these do not need any additional burdens on an already costly essential service that receives little or no

government funding. It will put rescuers and casualties at far greater risk and could very easily be considered as immoral by charging for people's suffering.

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:

Yes, there should be a 100% discount (i.e. no charge) for emergency life saving organisations. It is vital to maximise the safety for all and maintain efficient search and rescue operations.

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?:

Only if it does not adversely affect search and rescue operations. Communications is an essential part of SAR and it does require good and effective management but it must not impact cash strapped organisations engaged in provision of life saving operations.

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?:

The pricing system should only affect business and commercial parts of the spectrum, it should NOT affect SAR/life saving organisations.

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

Yes, no charge should be made for SAR related channels - it is inappropriate to charge for life saving operations that have traditionally be free of charge to casualties. Organisations engaged in these activities would have to find immediate funding and then have to continue to raise additional funds to continue to operate effectively - this surely can not be right!

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 charge should be applied when individuals users are employing radar/racons for essential navigation/emergency/life saving activities.

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 when used for significant commercial gain - smaller business should not be hit further financial impacts

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?:

Only when used for significant commercial gain

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:

Many rescue organisations spend all the money they raise on supporting the rescue of casualties, any additional drains on this money will have an adverse effect and will ultimately cost lives - what price would you put on rescuing a person and saving their life because effective communications ensured a full and proper response.