

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?:

I believe that not only commercial views should be considered in the management of the process. Voluntary and Charitable bodies who use the spectrum should also be fully engaged in the process, especially where the saving or preservation of life is concerned.

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 Teams in Scotland make use of the UK SAR Band Plan. Teams make use of ground based radios in bases and with hill top repeaters in accordance with the band plan. If charging was to be implemented over and above the present structure it is likely The Mountain Rescue Committee of Scotland and Individual Teams would need to decide whether they could continue to afford to make use of the band plan in its current form. Dropping of channels due to financial constraints would lead to blackspots in communication and less monitoring of the UK SAR Land Based Calling Channel 62a.

This will lead to teams out on exercise and callout being exposed to working in areas of no communication, where mobile phone coverage is non existent, meaning that if a casualty is located or a team member is injured then no communication would be possible to expedite any evacuation to a point of safety.

In many remote areas of Scotland the present band plan is the only way of communicating to coordinating bodies and authorities by mountain rescue teams.

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 do not see how allocation of what is a small part of the VHF spectrum to communication safety amongst rescue teams would harm UK competitiveness, especially when land based rescue is carried out by volunteers at very little cost to the UK government. If the voluntary MR organisations did not exist the Government would have to pay for the Police to be trained, equipped and to operate search and recover missing persons. It is afterall I believe a legal responsibility of the Police to deal with missing person situations. They currently co-ordinate use of MR resources, but rarely commit personnel to active 'off-road' search and rescue activity .

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:

UK mountain rescue is provided by volunteers coordinated by recognised and registered charities. They need to fundraise from the general public to provide this service and buy technical equipment to conduct rescues and provide revenue funding to maintain bases and vehicles. Teams regularly face tough decisions as to how to best spend donated funds in order to maintain the safety of both the teams and the casualty. Increased charging to use the UK SAR Band Plan and any other additional frequencies teams are using to supplement these may lead to teams making a stark choice between technical rescue equipment necessary to conduct a rescue and paying to use radio frequencies vital to coordinate teams and pass information that may make the vital difference to a casualties condition.

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:

No comment

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. I believe that the public who are donating money to mountain rescue and other charities saving lives would not expect part of the UK Government to be charging these same charitable bodies for vital use of the radio spectrum allocated to them. Where frequencies have been allocated to rescue use, such as the UK SAR Band plan a 100% discount should be applied. Where teams have a need to use additional frequencies outside of the band plan to provide additional communication structure in addition to the present band plan a reasonable discount should also be applied. I would suggest in the area of 70%.

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 where the spectrum is not being used for the safety and preservation of lives in a rescue situation.

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?:

How the charging of the spectrum is applied outside of the search and Rescue Framework is not relevant to a charitable body charged with the preservation of life. Again I strongly assert that the voluntary UK Search and Rescue Framework should not be charged for use of the current Band Plan.

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

Again, I strongly assert that the voluntary UK Search and Rescue Framework should not be charged for use of the current Band Plan.

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 comment

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.:

Again, I strongly assert that the voluntary UK Search and Rescue Framework should not be charged for use of the current Band Plan.

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 comment

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 comment

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 comment

Comments:

I am deeply concerned that the UK Government via OFCOM is considering increased charging to charities concerned with the safety and preservation of life. I am surprised that the UK Search and Rescue framework was not excluded from these charging proposals right from the beginning.