

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?:

Advice should be listened to and implemented. The users are those who know about this subject and are best fitted to understand the consequences of possible actions.

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.?:

We are an independent lifeboat recognised by the Maritime and Coastguard Agency and responsible for part of the Devon coastline and waters. We receive no funding from any government organisation either central or local. We are a registered charity (No. 1105914). We are totally reliant on locally raised funds. Any increase in our costs will have a detrimental effect upon the service we can provide. Over the last few years our income has just covered expenditure (despite rigorous spending controls) and last year expenditure exceeded income. Our continued existence depends upon no further costs. If we go out of business there would be a gap in safety cover on the Devon coast.

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

Failure to maintain coastal safety cover could lead to a reduction in pleasure cruising by foreign boats and problems with foreign fishermen in trouble.

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:

We need VHF radio communications to operate pagers which call out the crew. The current system based on mobile phone networks has gaps and holes which means that some crew members do not reliably receive call out warnings. If crew cannot respond the service is degraded and safety is put at risk. We cannot afford any further expense.

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:

Agreed.

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:

All safety related operations should have a 100% discount or be relieved of the cost ab initio. In particular charities already have great difficulty in raising the money to operate without this extra impost. There are in excess of 40 independent lifeboats around the coast of the UK who are not supported by the RNLI and do not have their resources to call upon. As a group they deserve special recognition.

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 in so far as it does not impinge in any way upon safety.

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?:

No. Many maritime and aeronautical channels are also used for safety purposes.

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. Cost increases at this time of economic hardship could send many smaller charities to the wall.

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 fees to charitable safety operations.

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 fees for charitable safety operations.

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 fees for charitable safety operations.

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 comments other than to reiterate - no fees for charitable safety operations.

Comments:

To provide charitable safety operations with a 100% discount off fees would establish the principle that fees are chargeable to them but currently discounted. This leaves the door open to reduce the discount in future. Charitable safety operations should be exempt from any fee structure.