

**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?:**

Not qualified to comment

**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.?:**

Not qualified to comment

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

Not qualified to comment

**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:**

Not qualified to comment

**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:**

Not qualified to 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:**

Yesterday, I listened with deep concern and amazement to a piece on ?South Today? about the difficulties that the RNLI may face with the proposed introduction of increased license charges for their VHF radios. To start with, I was unaware that the Government was prepared to take any license money off an emergency service, let alone one that operates as a charity. It has always astonished me that the RNLI depends as it does on charitable giving for it to be able to operate, and that the safety

of shipping round our coasts is supported by volunteers with little or no support from Central Government.

This is beginning to look like a nail in the coffin of a service that actually supports itself with no Government handouts. RNLI Crew work all year round to provide 24hour sea rescue cover in the UK and have been since 1824 with upwards of 137,000 lives saved. RNLI lifeguards now also patrol a number of beaches during the summer. The majority are volunteers, and normally only one crew member per station is full time paid and he is normally the Lifeboat mechanic.

For the Government to even think about sending the RNLI a bill for radio license fees is outrageous. How many more volunteers and supporters are going to have to stand outside Tesco Supermarkets shaking a charity tin, just for the Government to take that money in what is effectively a tax. I am speechless. I find it incredible that such a deeply unpopular Government should be spending so much of its time to find ways to actually increase their unpopularity. As usual I have to wonder if anyone really is in charge of this Government madhouse. How anyone can think this is a good idea really is beyond me.

What would the Government do if Lifeboat Stations around the country started to close down ? Perhaps the members of the ?Department of Good Ideas? who are making these proposals and decisions should be set adrift in a leaky boat somewhere in the North Sea during a Force 10 Gale. Maybe then they will realise the mistake they are making and treat the RNLI with the respect and support it deserves.

All license fees for the RNLI should be waived.

**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?:**

Not qualified to comment

**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?:**

Not qualified to comment

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

License charges for the RNLI should be waived

**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:**

Not qualified to 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.:**

Not qualified to comment

**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?:**

Not qualified to 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?:**

Not qualified to 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?:**

Not qualified to comment

**Comments:**