

**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?:**

Yes - employ someone who knows what they are doing and can differentiate between commercial businesses and volunteer charities whose sole operation is safety and lifesaving

**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.?:**

This organisation has to raise its own funds from local collections.  
National Coastwatch currently provide 40 safety watchtower around our Coastline, responsible for saving about 50 lives per year

Introduce this exorbitant fee and many will be forced to close down purely through Ofcom's greed.

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

National Coastwatch does not compete - our volunteers just save lives.

WE ARE NOT A COMMERCIAL BUSINESS  
WE DO NOT CHARGE FOR OUR SERVICES  
WE RECEIVE NO GOVERNMENT FUNDING

**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:**

Take just our local Coastwatch Volunteer station at Skegness - in one year accredited with saving 8 lives

How do you put a price on that ?

If they had died the aftermath, recovery of body, police time, post mortem, hospital time, coroners time, coroners court, plus disposal or burial costs the government about 1 million per dead casualty

For everyone we DONT save it will cost £1 million - so if we close down, be prepared to expend millions more than you can extort by unfair, uninformed and taxing of the frequencies we use.

**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 our concern

**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 YES YES - at least 100% DISCOUNT for Search and Rescue charities.

**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 our concern

**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?:**

Every vessel at sea is continually at risk - no fees - it is immoral

To propose a charge for Emergency rescue charities to use radio to save lives is OBSCENE

Ofcom suffers from total professional incompetence even to suggest this

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

See above -

**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:**

Again - obscene to charge for life safety and protection equipment  
OBSCENE is the word

**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 - obscene to charge for life safety and protection equipment  
OBSCENE is the word

**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?:**

Again - obscene to charge for life safety and protection equipment  
OBSCENE is the word

**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 our concern

**Question 14: Do you agree with the basis on which Ofcom has arrived at its initial view on reference rates for aeronautical radionavigation aids?:**

**Comments:**

It is obvious that OFCOM has reached new heights in professional incompetence in trying to close down volunteer emergency services through this disgusting money grabbing exercise.

Who dreamed this one up - I would like to see them in a sinking boat in front of our tower and tell them we cannot call for help for them as we cannot afford the exorbitant licence fees proposed by your department.