

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?:

Skye Mountain Rescue Association (SMRA) has no views on this matter, other than that the views of non-profit making, charitable search and rescue organisations must be taken into account.

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.?:

At present SMRA use the UK SAR Band Plan along with other mountain rescue teams in Scotland. As The Isle of Skye is almost unique in having high mountains so close to the sea, the combination of channels available to us (including ch.0) allows us to communicate effectively with different elements of the rescue effort which may not all be land based. If charging is introduced over and above the current structure we probably wouldn't be able to use the band plan in its current form.

For example, a mountain rescue in the Coruisk area of the Cuillins, may require communication between search teams on the ground, a helicopter, a lifeboat or other vessel (all on different frequencies), and the co-ordinating control base. As direct communication is very unreliable between the search teams in Coruisk and base (and other areas in the Cuillins), these other elements are vital in the communication link. Coruisk is an area that can literally be impossible to escape from in bad weather due to low cloud and rising rivers, and evacuation of casualties and rescue teams has only been effected by co-ordinating with marine vessels on several occasions.

Other channels available to us, allow us to operate independently from our neighbouring teams, without interference, but work alongside them if necessary, ditto with RAF MRT's, and monitor emergency calling channels.

We have no doubt that lives would have been put at risk without these different channels being available to us. The current band plan is effective for our current needs, developed and fought for over a long period, by those experts with long experience of co-ordinating mountain rescue, and we see no reason to change it.

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

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:

As a volunteer based organisation which relies for its funding on a small government grant and donations from the public (often from people who have been rescued themselves or the relatives of fatalities), the proposed charges for ground stations? use of maritime VHF channels would use up a large portion of our budget. This would have a serious detrimental impact on our ability to mount safe and effective rescues from these remote hills.

At present we use several ground stations to cover all the mountainous areas of Skye: South and North Cuillins, North Skye and two mobile units for other areas which we regard as barely adequate but essential. If the proposals to charge each ground station go ahead, the team will face very difficult choices regarding the provision of radio communications and/ or safety equipment.

1. Either we would have to limit the channels or base sets we could afford, in which case we face the example of a situation outlined in our answer to Question 2 without any communication. Mountain rescuers are self-less and courageous people, but most team leaders would hesitate to send teams without communications to these areas in dangerous conditions, assuming they were prepared to go.

2. Or, if we consider that the full radio coverage is vital, then replacing items of equipment and clothing would take a lower priority, thus reducing the safety of our own members involved in call-outs.

SMRA also believes strongly, that funds donated to us for the safe provision of mountain rescue on The Isle of Skye should not be handed back to the UK Government in fees.

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:

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:

SMRA believe that rescue services, especially those run by volunteers should get a 100% discount if charging is introduced.

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?:

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?:

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

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:

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.:

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?:

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?:

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: