

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?:

Firstly Ofcom should listen to the concerns of those sections of the public who currently rely on the use of VHF radio in all sorts of craft on land sea and air. VHF radio is first and foremost a safety instrument. If charges are levied on institutions or the private user, they will move away from using it and rely on mobile phones. Many people believe this is a viable alternative but it is a naive view. I am not talking here about fishermen and others who lock up the frequencies with innane and unnecessary chatting.

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.?:

My area of concern is safety at sea being an offshore sailor. The VHF link is what I would be reliant on for rescue. this may be for myself or in the assistance of others. If the RNLI is charged for the use of the service, in short they could not afford it. It would in effect be a tax on the voluntary contributions made by members of the public. This is totally unacceptable. It is not clear what the RNLI could do to cover any such charge but clearly it would compromise their operations and the cuts they would be forced to have a severe detrimental effect on their effectiveness. I am personally alarmed that OFCOM should even be considering such a move against the RNLI. I have to add that I am not surprised however, having fought for years against their charging the private boater for a license.

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

No. This is an irrelevant question when related to issues of safety. It may apply to purely commercial organisations.

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:

I am only concerned with safety issues arising from any proposed charges. The RNLI rely wholly on voluntary contributions from the public. They currently struggle to provide and maintain the second to none and free service to the public. The financial

impact could be disastrous. It could undermine the willingness of voluntary helpers. The crews are unpaid. The public who give are not only those who benefit. It could even bring the RNLI to it's knees and make them insolvent

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:

I am not qualified to comment on the charging for aircraft but if their use of radio is for safety, then the economics should not be the first consideration.

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:

There should be no question of discounted fees when safety is the paramount reason for the use of the frequencies. However if the organisation is a commercial airline for instance then they should be prepared to make appropriate payment for the service.

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?:

It is important to maintain control of VHF channels to ensure they are used correctly. We still hear users chatting on Ch16, and others idly chatting on ship to ship channels. However the consideration to charge operators of ground stations that are there primarily for safety must be opposed.

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?:

You cannot and must not get confused between Business and the Search and Rescue organisations such as the RNLI. The latter do not charge for their services so have no income other than voluntary contributions from the public. They are a unique part of our way of life. Do not forget that the service is and should be funded by government. The financing of the communication service has allready been paid for and therefore owned by the public who pay taxes.

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

For a start, the RNLI do not have the finances to pay for such proposed charges. They should never be forced into a situation where they have to charge for rescuing any soul in danger of losing their life. They would not be able to maintain the fleet of lifeboats and we would see a rapid decline in the service. The only result of this would be loss of life at sea

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:

Fees apportioned to purely rescue services should be on a zero basis.

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 qualified 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?:

No qualified 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 qualified 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 qualified comment. However Q11 to Q14 should have bearing on the decision to charge charities such as the RNLI

Comments:

I have to say I am appalled that Ofcom should have even thought of charging our national rescue organisations. The individuals who have proposed this must be cold

and unthinking. I trust that they are never in need of these services if they cannot afford to use their radios, or worse they do not have a lifeboat.