

**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?:**

Ofcom should take advice from all stakeholders. However, Ofcom should understand that Mountain Rescue Teams and the RNLI should be treated as a special case as they are both frontline rescue services and are voluntary organisations, reliant on generosity from the public to maintain their activities.

**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.?:**

Mountain Rescue Teams operate, by definition, in mountainous areas, where even with the latest technology, there can be problems with radio communication. It is essential that there are the highest possible standards of communication between rescue teams, their base and with helicopter crews. If these links are compromised there could be serious loss of operational efficiency, and at worst loss of life or the danger of casualties suffering from more serious disability, due to delays. The risk of cross channel interference must be reduced to a minimum.

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

It is understood that analysis has shown that some channels in the UK are underused

**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 member of a Mountain Rescue Team and a former Chairman, I can attest to the constant grind to obtain funds to support our activities, even though our team has no paid staff and is run very economically. We have constant pressures to raise funds for training, new and replacement equipment, running costs of Landrovers etc. All our members freely give of their time and put themselves at some personal risk in order to provide a service to people in distress in the mountains. Members would rightly be dismayed if charging were introduced - it would appear to be a signal that the sacrifices they and their families make is not appreciated by the government. The need to raise even more money each year would impair operational efficiency.

**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:**

Yes

**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, there should be no charge to life saving organisations run on a voluntary basis, such as Mountain Rescue Teams, Search Dog Teams and the RNLI

**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?:**

SAR channels should be used as effectively as possible, provided this does not conflict with life saving activities.

**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?:**

Yes, but where commercial gain is involved, not for voluntary bodies.

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

No charge should be made for channels used in Search and Rescue

**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:**

Mountain Rescue Teams are not involved with radar or beacons. However, if distress beacons are used by voluntary SAR, there should be no charge.

**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.:**

Only charge where there is commercial gain

**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 if the spectrum is used for voluntary life saving activities

**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 knowledge of the issue

**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 knowledge of this issue

### **Comments:**

Voluntary life saving organisations should not be charged. It would put extra strain on very scarce resources. It would also be a slap in the face for many committed volunteers and their long suffering families.