

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?:

Organisations which provide rescue and emergency services on a voluntary basis, should be given priority in this consultation. These are not-for-profit services offered on a voluntary basis.

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 accident casualties and members of organisations such as Mountain Rescue Teams (MRTs) would be put at risk if MRTs had the number of channels reduced or were forced to share with other agencies. This could lead to co-channel interference. During complex operations where there were a high number of casualties with many rescuers operating in areas where co-frequency crossover occurred, communications could become unworkable with potentially serious consequences. This could increase suffering of casualties, increase the risk to rescuers, and potentially increase the risk to life.

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

Yes. There are a large number of frequencies not being used effectively in the UK spectrum allocation

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:

Voluntary life-saving organisations such as MRTs have to raise funds to cover their basic operations. This proposal will increase the need to seek additional public donations to fulfil the life-saving activities the organisations perform. There is little doubt that there is a significant risk that lives will be put at risk if the cost of the license goes up, or if vital SAR channels are lost, shared or removed, resulting in voluntary life-saving agencies having to pay from limited funds. Voluntary life-saving organisations (who provide a service that would otherwise have to be provided by UK government agencies) are already over-stretched because of increasing casualty rates,

callouts, new legislation, higher expectations, greater inter-agency expectations, training demands etc.

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 for all volunteer life saving organisations. It is vital that the existing rescue channels are retained to allow the continuing provision of an effective rescue function.

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?:

Providing its use is not for life saving activities. It should be noted that great care has been taken to make the use of rescue channels as efficient as possible.

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 only where there is usage for commercial gain.

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 charges should be made for the use of existing rescue frequencies where the user is a voluntary rescue service

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:

No charges should be made in respect of EPIRB, PLB or other emergency satellite signalling systems

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 for usage where commercial gain is made

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 opinion or information regarding this question

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 opinion or information regarding this question

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 opinion or information regarding this question

Comments:

If you implement this proposal, you will place a disproportionate cost on voluntary rescue services. The increased costs will inevitably mean a threat to volunteers and a possible loss of life, increase in pain and reduction in services