

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 has not properly consulted UK land-based Search and Rescue assets on the proposed invoking of trying to charge fees for the use of the UKSAR Bandplan. This Bandplan has only recently been finally formalised, and is a vital part of a VHF dedicated group of channels used purely to assist the saving of life by SAR assets. It is not fair to charge fees for these channels when those that provide the SAR service do so voluntarily and free of charge. Commercial gain should not be the basis for 'stealth taxing' the tools of those who lay their lives on the line for others!

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.?:

The UKSAR Bandplan is an agreed specific group of channels for joint working during training and rescues between various SAR assets. The channels assist in maintaining safety of life, resilience, and health and safety of members. VHF systems have resilience that other independent communications systems often do not eg when O2 Airwave has either saturated or failed during major incidents, terrorism, or natural disasters. VHF systems do not usually require landline links. O2 Airwave and similar cell-based type systems have unreasonable and prohibitive costs to voluntary organisations in the SAR fraternity

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

My argument has nothing to do with competitiveness; we are talking about effective SAR comms whilst trying to save and preserve life in hostile environments because of the misfortune of others.

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 Mountain Rescue in the UK could not afford what you propose, and the channels should be available FOC for this purpose only, eg training for and saving of life. Accounts are available for all UK based Mountain Rescue teams and are available for inspection through OSCA.

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:

VHF bands for official legitimate purposes eg ATC, SAR should not be charged for.

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 100% discount. OfCom should charge the same as UKSAR charges the genuine victim/casualty ie zero!

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?:

This question is very badly worded! VHF bands for official legitimate purposes eg ATC, SAR should not be charged for.

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?:

There should be no fee structure. VHF bands for official legitimate purposes eg ATC, SAR should not be charged for.

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

You would put many charity based UKSAR resources so far out of pocket that they would cease to be able to operate, and this would break the spirit of UK Land and Maritime SAR!

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:

Commercial use of frequencies could be charged for.

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 view except SAR should not be affected or penalised in monetary terms.

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 view except SAR should not be affected or penalised in monetary terms.

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 view except SAR should not be affected or penalised in monetary terms.

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 view except SAR should not be affected or penalised in monetary terms.

Comments:

Don't try to charge or to commercially gain by 'stealth taxation' on the usage of UKSAR radio requirements, just to fill the coffers of the UK Treasury. You will regret it in future when we can't come searching effectively for you on remote and wild hillsides!