

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?:

Public consultation

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.?:

I am concerned that charitable and or life preserving organisations should be charged at all. If they are using equipment supplied or maintained by other parties this MAY be acceptable but being charged to use the "airspace" in my opinion is fundamentally wrong.

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

NA

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:

For MR use, if fees come to be passed on this will have a serious negative impact on the use and availability of radiocommunications in which case it is quite easy to consider scenarios which would lead to loss of life which would not have occurred had adequate communications been available.

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:

NA

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:

Should be ZERO fee, not discounted.

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?:

For commercial users - yes.

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?:

No - as I have said - rescue and samaritan services should not pay at all.

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

NA

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:

NA

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.:

NA

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?:

For commercial use but not for rescue services and other service organisations - they should not be charged at all.

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?:

NA

Question 14: Do you agree with the basis on which Ofcom has arrived at its initial view on reference rates for aeronautical radionavigation aids?:

NA

Comments:

My main concern is as above - charitable organisations should not at all be charged for use of airspace. The notion that someone "owns" and can charge for use of bandwidth I find quite wrong. In particular - although it is stated that Mountain rescue teams will not be affected by this I am worried that if HM Coastguard see an increase in price, then likely one day they will be looking for MR to contribute. At the moment MR communications are just about barely adequate, we are still recovering from the costs incurred in changing out all our old radio systems (which were better than what we have now in many circumstances). I have been an active member of an MRT for over 10 years now and there would be huge safety implications if we lose bandwidth or have to start paying for it. I sincerely hope I never see the day. I would also like to see that HM Coastguard is not charged at all in future.