

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?:

In addition to contacting all affected users of the spectrum, Ofcom should also talk to the EU bodies governing the allocation of radio spectrum and also the EU bodies regulating the Aviation and marine industries.

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.?:

This will generate a disincentive for small airfields to provide an air ground radio service. As many can operate without radio they will do so if the costs of providing a radio service are too high.

Without information from the ground station, take-offs and landing are more hazardous.

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

As this scheme involves one government department charging another government department and the money being recycled through the treasury, there will be an inevitable administration cost with no benefit being realised. Increasing bureaucracy has a negative impact on the UK economy as a whole.

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:

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. This will lead to aircraft leaving the UK register for cheaper administrations. A problem the CAA already has with aircraft owners in the UK preferring the US register.

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:

Most aircraft and marine communication is for safety purposes. The only exception are the private airline company channels. The number of these does not warrant the administrative costs on setting up the scheme.

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?:

No.

There are no alternative uses for these channels. They are allocated for sole use for aviation or marine by the ITU. At European level the control is from CEPT. Applying any pressure for better spectrum utilisation just in the UK will not have any effect.

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?:

The business use is governed by the need of the market. The aviation and marine use is mandated by safety regulation and therefore is largely not within the control of those who would have to pay the charges.

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

Changes to procedures, technologies, and frequency band allocations have to be made at international level and take decades to negotiate and implement. Short term effects of charging is just more costs, with users being unable to do anything about those costs or seeing any benefit.

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:

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.

This spectrum has no value for any other purpose as this is dictated by the ITU. There is only one user of the band, the DoT. Therefore there is no market for this spectrum outside the one current user. Therefore this is not a sellers market. As bot buyer and seller have the same owner this is pointless.

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?:

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?:

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.

Comments: