

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?:

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.?:

Please read and digest the response of the RNLI, whose views I can only echo. The mechanism of effectively grabbing £260,000 per annum by way of government confiscated voluntary charitable donations out of taxed income cannot be justified. If I give £100 of my income to the RNLI I do NOT expect it to be taxed. I have a CAF account for this purpose and clearly the government is in favour of charitable donations else tax reclaim would not be permitted. It seems wrong in principle for a quarter of a million pounds, or even one single penny, to then be effectively siphoned off into government coffers. As RNLI's income is all voluntary contributions, then it is self-evident it would have to make cuts of a quarter of a million in the services and operations it can provide. The government saves a huge amount of money already due to the willingness of the volunteers of the RNLI to risk their lives. If it now intends to make yet more money by confiscating contributions then as this is money that cannot be replaced, a detrimental impact on safety is guaranteed by the proposal. Every penny the government pinches from RNLI could and would have been spent on providing a safety service for maritime safety.

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

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:

According to RNLI the pricing proposed would effectively tax the charitable contributions people have made to RNLI to the tune of £260,000 per annum. Shame on Ofcom for even considering taxing a penny of people's hard-earned charitable donations. Donors would be appalled to think that such a blatant cash-grab was even being considered.

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:

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:

The question is banal. It should be self-evident that there should be NO charge (let alone a "discount" for such organisations. The question should be reversed: "Can you think of ANY reason why charities whose object is the safety of human life in an emergency should be charged at all"? the answer, plainly, is that there is no such reason.

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?:

Charities whose object is the safety of human life in an emergency should have first and free call on the channels they use. The consultation should only apply to other users.

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?:

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

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.:

There should be a zero rate for charities whose object is the safety of human life in an emergency. If there is any suggestion (and I know of none) that RNLI make inefficient use of the spectrum then that could be addressed directly with them.

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, to the extent that Ofcom has included charities whose object is the safety of human life in an emergency as potential payers. They should be exempt from any pricing system imposed.

Comments:

I am as baffled as I am outraged by the proposal to charge voluntary life-saving organisations such as RNLI, of which I am a member.

Ofcom is quoted as saying:

"This is a consultation and we are open to hearing people's views. We are consulting on whether life-saving charities should get a discount compared with other users."

It is mindboggling that Ofcom should even ask the question, which really answers itself for any right-thinking person: there should be NO charge for RNLI and it is wicked to grab voluntary donations from an organisation in which ordinary members of the public voluntarily risk their lives on a daily basis, freeing the government from what would otherwise be huge expense in providing an alternative.

Ofcom further states:

"Ofcom believes that this will encourage efficiency in spectrum use, by increasing the likelihood that spectrum will be held by those who can make best use of it, and by creating more freedom for spectrum to be used for more valuable applications"

Does Ofcom feel that there are more "valuable applications" than a lifeboat launching into a major storm to save lives? What are these?

Does Ofcom know, or suspect, someone else may make better use of RNLI's frequencies than RNLI? If so, I would like to know who.