

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 should consider that these radios are used by rescue teams to help save lives. The team members are all volunteers who give their time freely. Search and Rescue (SAR) including Mountain Rescue Teams and other Emergency Service agencies should have due priority in this process. The needs and views of these life-saving emergency response organisations, which are charitable and not-for-profit units, should take due precedence over those of commercial sector.

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.?:

Having to pay for licence fees will mean that the teams have less money available for essential life saving equipment. If Mountain Rescue Teams were forced to share with other agencies, this is likely to result in saturation and a dangerous increase in interference.

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

These radios are essential for Search & Rescue management. In UK, there are many unused channels.

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:

Mountain rescue teams rely on volunteers to carry out rescues and they in turn rely on voluntary contributions to provide their life saving equipment. It would be wrong to expect them to have some of their valuable and essential donations diverted into paying licence fees.

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:

Mountain rescue teams SAVE LIVES. If fees are to be paid for radio licences, less money will be available for rescue equipment and this could make a difference between life and death for some unfortunate casualty.

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 - NOT FOR RESCUE SERVICES THAT OPERATE ON A VOLUNTARY BASIS.

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?:

Rescue teams do not have any commercial gain therefore should be exempt from licence fees.

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

Fees for Mountain Rescue team radios will have a detrimental effect on the Health & Safety of the teams and increased costs will put lives at risk.

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.:

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?:

Only for profit making commercial use.

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?:

Comments:

If Mountain rescue teams have to divert some of their funds to pay radio licence fees it will reduce their overall effectiveness and is almost certain to result in more loss of life.