

**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 light of OFCOM's ongoing debacle with Phorm, I think it's almost certain that new systems for processing and responding to concerns from individuals, organisations, users and regulators is required.

If no outcome can be decided in the public good, you should start again with a better system and better questions.

Also, I believe that you should suggest to users of your service the need to publicise to their users and stakeholders - I only heard about this on 12 October, and your consultation has been open for months. The current method of announcing 'public consultations' certainly does not get it into the mainstream.

**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.?:**

Raising costs for radio spectra will almost certainly impinge on the most important users, who doubtless will be those with the least financial resources.

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

I am not of the opinion that competitiveness is a virtue.

In First Aid, for example, one should not act competitively, nor in escaping from a fire.

Any system which is founded on mere competition is deeply flawed.

**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:**

As noted by the RNLI and the Scottish Mountain Rescue Services, the financial impact of your AIP fees is likely to cause (among other things) death.

Further, similar price increases for other industries could cause smaller users out of business.

The premise that 'if you need it, you can pay for it' is deeply flawed. I believe this kind of system leads to large operators 'hogging' the available resources for later sale or simply to control the market.

**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:**

There should be a waiver of the fee for charities whose object is the safety of human life in an emergency.

A large discount (greater than 50%) should apply to non-commercial and volunteer staffed ventures.

**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?:**

Potentially, some form of the AIP could be used. But the blanket declarations made within the AIP are faulty. The AIP in its current state would cause severe financial problems for small and voluntary organisations.

Better regulation further up for large scale and commercial ventures would be an improvement. Perhaps a sliding scale should be introduced.

NO discounts or exceptions should be made for bulk buyers, since this penalises smaller users. Radio spectra should be cheaper the less you need.

**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?:**

I think the system for Business Radio licences is flawed in the same ways as the AIP, but your consultation announcement process left me unable to comment. Damn.

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

Specifically, if you have managed to remain unaware, the world is facing a global financial crisis, which is causing problems to businesses and organisations large and small.

Also, what gives? You have let Phorm mess the UK consumers of broadband around for years, but when you need something done, it's less than a year from the announcement of the very short consultation time to the implementation of that system. Six months from the closing date?

**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.:**

I'm not an expert in radio, so I don't really understand the question here.

**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?:**

I do think that this use will increase, and you are right to be attempting to regulate the use of these things.

People in general have a disbelief in those things which can't be seen, like air pressure and radio waves. However, better regulation is the key here.

Many groundbreaking modern technologies, such as wireless, are using resources and affecting all of us, but they seem to have been introduced with little regulation or thought for their various implications. The production and manufacture of the items used for radio and airwave communication should be strictly regulated, according to principles which are conceived in advance of any marketing pitch by some hotshot new firm.

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

I suspect that your overall assessment is not bad, but that your conclusions drawn from these are inherently faulty.

**Comments:**