

**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.?:**

There is certain to be a reduction in safety as a result of charging for use of VHF comm radio stations. Many smaller aerodromes both licenced and unlicenced make use of radio to maximise safety of aerodrome participants. The likely cost of such facilities will inevitably cause many to be forced into giving up their radio frequency. This will decrease safety without doubt and accidents will occur because of this. Radio frequencies are also used for radio navigation (GPS is not considered appropriate by the CAA) so any reduction in the availability of radio nav aids would again lead to a loss of safety. With airspace becoming more and more controlled, the use of more radio stations and radio navigation aids would appear to be the requirement, not less.

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

A reduction in flight safety would result in further deterioration to the UK light aircraft industry and will drive flight training organisations to relocate abroad. There is already a process indicating that flight training should be enabled from unlicenced aerodromes in order to stimulate this market. Whilst unlicenced airfields have lower operating costs, the charging for radio frequencies is likely to impact this move as a substantial cost will be added. See also the answer to question 5.

**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:**

The level of regulation we suffer from in the UK is already seen by light aircraft pilots as high. The addition of further cost and administrative burdens on aircraft owners will encourage the transfer of registration to other EU states as the EASA rules come

into play. The result will be a move to the registers of whichever country provides the least economic and regulatory burden. As an aircraft owner, I am looking forward to the EASA developments as I will then be able to operate an aircraft easily under a foreign registry.

**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:**

I believe that any frequency used for the purpose of ensuring safety and not for the purpose of financial gain itself should have a cost set at zero.

**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?:**

I cannot comment on the maritime use of radio frequencies. As far as aviation uses are concerned I do not agree with these proposals. The frequency range concerned is defined by international agreement and imposed in UK law. As there is no way these frequencies can be allocated to any other use, there is nothing to be gained by increasing the charges as stations closed down could not have their frequencies reallocated to anything but an aviation purpose.

**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 I do not think it is appropriate. For the reasons given in question 7, the frequencies are not ones which can simply be resold to a higher bidder.

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

In the current economic climate, there is every reason to avoid the introduction of additional costs to the already struggling Aviation Industry

**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?:**

**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:**