

**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?:**

Mountain rescue organisations can't afford to pay additional fees for the use of airwaves. Combining commercial enterprises and volunteer search and rescue bodies is ridiculous at best, as they are two very different entities and their respective needs should be looked at objectively. Especially considering these mountain rescue units are an important emergency resource that are called on by the Police, this is a burden that these teams could do without!

**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 would result in someone losing their life. Simple. Sharing channels or reducing channels would put all parties involved at risk. If a major incident occurred, would all communicating channels be blocked? Who would get priority? This would put lives at risk and compromise effective search and rescue operations.

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

Current usage in other sectors are underused. as I raised in point 1 - combining or reducing any spectrum width will jeopardise SAR effectiveness and safety!

**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, SAR organisations need to keep all the money they have raised to accomplish the life-saving activities they perform. It is no overstatement to say that many lives will be put at risk if additional running costs are incurred.

The morality of this change should be brought into question where volunteer MR units performing a humanitarian role who are overstretched because of increasing victim rates etc!

**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:**

Yes, there should be no charge for all volunteer life saving organisations. It is vital that the existing SAR channels are retained to allow effective SAR function.

**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?:**

There should be clear demarcation between commercial and SAR bodies. If additional use is not for life saving activities. Current SAR usage is set up to ensure SAR channels are as efficient as possible.

**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?:**

Yes but only for profitable gain i.e. non-mountain rescue etc

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

No charges should be made for channels that are specifically used for Search and Rescue operations. END!

**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:**

No charges should be made for channels that are specifically used for Search and Rescue operations.

**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.:**

Yes but only for profitable gain i.e. non-mountain rescue etc

**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?:**

Yes but only for profitable gain i.e. non-mountain rescue etc

**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 don't know this and can't comment!

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

Unsure. But SAR should be left alone and only organisations that used bandwidth for profit/non-life saving activities should be charged.

### **Comments:**

Someone's life will be put at jeopardy if these charges are increased for frequencies that are used for life saving activities. The price increase falls on the voluntary SAR agencies which has to rely on fund raising to support the activities they perform ? at the request of the police. Safety of human life should be overriding!