

**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?:**

You should listen to the number of complaints - you haven't exactly been flooded with people saying what a good idea, have you?

**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.?:**

Many small airfields simply can't afford to pay for a licence for a ground station at the proposed rates! So how does a pilot get up to date information about conditions at an airfield, conditions that may be quite different to those expected due to, for example, rapidly changing weather (something vital for flight safety) if airfields have to do without a ground station?

How does a small gliding club afford this tax on safety - almost all such clubs are just amateur sports clubs with limited funds, and forcing them to compromise safety because it is too expensive is not exactly a desirable situation.

Do such ground stations in Europe face a safety tax? Or does the rest of the world except for OFCOM consider that communication between pilots and the ground is a vital safety net, allowing pilots to choose to divert when told of impending bad weather many miles ahead? An accident at the destination airfield could render the runways unusable, and with a tax on safety ruling out a ground station, how is a pilot supposed to learn that they can't land at their destination?

What if a passenger took ill and the pilot tried to call the nearest airfield to request an ambulance for help, but the ground station was closed down due to this tax?

I myself was involved in a very serious accident a few years ago, and pilots overhead saw my crashed aircraft and called the ground station at the nearby airfield, enabling an air ambulance to be called and sent out to rescue me. What would have happened if there was no ground station to receive their emergency call???

**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:**

**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:**

There is little to be gained by taxing ground stations, and there is a lot to be lost in terms of safety.

**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!

**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

**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 - see you earlier views above

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

It's just inappropriate, full stop.

**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.:**

No

It should be free.

This is just a money grabbinbg exercise, and as it will not actually raise a huge amount of money, th ewhole idea is too silly for words.

**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?:**

No

**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?:**

Yes

Can't see it changing

**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

It's just a money grabbing attempt that will effectively tax safety by resulting in ground stations closing down.

**Comments:**