

**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 ensure that the voluntary rescue team sector is fully consulted. The very real problem that licence fees would present to rescue teams do not appear to have been considered in writing the document.

**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.?:**

Civilian voluntary rescue teams and organisations must use the mandated UK-SAR band plan for radio communications. All teams must be able to use all channels to interwork efficiently. The charging proposals would appear to hit us with very heavy licence costs for zero benefit to anybody except the exchequer. This will reduce the amount we can spend on rescue equipment and training and inevitably reduce our effectiveness in saving lives.

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

no comment

**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:**

The UK-SAR band plan has several dozen channels. While a team could exist with only a few of these, in order to interwork with all other teams our radios need to be capable of working on all the UK-SAR frequencies. There are about 24 programmed into my radio which if I understand the proposals correctly would result in a licence fee of £1800, or more than our team's total income in past years. Voluntary rescue organisations should be exempted from licence fees or receive a 100% discount.

**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:**

no comment

**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:**

All voluntary rescue teams should be exempted from licence fees or receive a 100% discount. The proposed 50% discount is inadequate. Volunteers give their time free, and the state should similarly provide spectrum free for rescue team use.

**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 comment

**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?:**

Licence fees may be the best way to control use in the commercial arean, but has no part to play when saving lives. Teams are required to use the UK-SAR band plan. Saving costs by moving to a different band - perhaps one not requiring a licence - is possible I suppose, but the resulting effect on effectiveness really makes it impossible to even contemplate. Voluntary rescue teams should not have to pay 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?:**

In both the short and long term the onerous level of licence fees (even at 50% discount) being proposed would greatly reduce the amount we could spend on equipment and training and result in a poorer rescue service.

**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 comment

**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 comment

**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 comment

**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?:**

no 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?:**

no comment

### **Comments:**

If it isn't clear from my comments I think that charging rescue teams for using the radio spectrum to save lives is ridiculous. Volunteers devote a lot of their time and energy providing a rescue service at no cost to the state and at considerable cost to themselves. The least the state can do is provide them the radio spectrum they require free of charge.