

Title:

Mr

Forename:

ALAN

Surname:

BARKER

Representing:

Self

Organisation (if applicable):

Email:

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Additional comments:

Question 1: Do you consider that our proposed fee rates for licences in the aeronautical VHF frequencies are appropriate?:

No. Spectrum in the aeronautical sector is protected under international treaty for safety of life. It is not possible to reallocate spectrum to other non aviation users. This is nothing but a tax on aviation and will ultimately effect the safety of aviation users including the general public.

Question 2: In devising our revised proposals, have we identified all of the aeronautical uses of VHF communications frequencies which require a distinct approach to fee setting, as set out in tables 5 and 6?:

Question 3: Do you agree with our proposal not to charge any fees for Fire assignments?:

Question 4: Do you agree with our proposal to set a £75 fee for licences in any of the sporting frequencies?:

Question 5: Do you agree with our proposal to set an annual fee of £19,800 per ACARS or VDL assignment, with no variation related to the number of transmitters?:

Question 6: Do you consider that our proposed approach to phasing in fees for use of the aeronautical VHF communications channels are appropriate? If there are particular reasons why you consider that any user or group of users would need longer phasing-in periods, please provide any supporting evidence for us to consider. Specifically, do you have any evidence for us to consider that would support either of Options 1 and 2 for the highest proposed fee in this sector?:

Question 7: Do you have any further quantified information to contribute to the analysis of financial impacts of the proposed fees on particular spectrum users, as set out in Annex 5? We would like to publish all responses, but will respect the confidentiality of any material which is clearly marked as such.:

Aviation is an ever tightening sector with maximum regulatory overhead with minimal income. The introduction of fees will force smaller operators to abandon the use of radio equipment. This in turn will deter people from carrying and using radios equipment when airborne. This will unravel more than a decade of effort by aviation safety groups to get people to carry and use VHF and transponding equipment. This will have a detrimental effect of safety across the entire aviation sector and increase the danger to the general public.

Question 8: Do you consider that our assessment of the impacts of our proposals has taken full account of relevant factors? If you consider that there is additional evidence that would indicate particular impacts we should take into account, we would be grateful if you could provide this.:

This is nothing more than a poorly thought out tax in an attempt by an agency that has no understanding of this sector to raise revenue for the government and justify it's own existence.

An Air-Ground radio station at an aerodrome provides co-ordination information for pilots flying at the aerodrome and in the vicinity. It provides an information source that enhances flight safety. The current fee for an Air-Ground radio station is £100 per annum. The proposed charges will see the fee rise to £2,600 after four years. The increase in fee will, in many cases, result in the aerodrome operator withdrawing the Air-Ground service and with it the safety enhancement that it provides to pilots. In this instance AIP will not lead to basic aerodromes releasing unused or poorly managed spectrum, but the loss of a safety service on a single frequency, and so will not achieve the fundamental aim of the proposal, that is efficient use of spectrum.

Summary The proposal seeks to place a commercial value on a vital safety resource and is a poorly disguised attempt to raise revenue on the pretext of improving efficiency without regard to the individual's ability to make changes in their use of spectrum. If the proposal were to go ahead as planned it will lead to increased costs for the aviation sector and a reduction in flight safety that will not be confined to the private sector of aviation. It has not been demonstrated that the introduction of higher fees than present will cause a more efficient use of spectrum.