

## **APPLYING SPECTRUM PRICING TO THE AERONAUTICAL SECTOR - A Second Consultation**

Dear Ofcom,

It is disappointing, to say the least, that you have decided to consult again on applying AIP to the aeronautical spectrum. You were barraged last year with negative responses to your plans and now you are back for more. Because your first consultation was so complicated and potentially damaging to aviation, many GA representative organisations like the LAA and the BGA (not to mention individuals) had to expend considerable resources on dealing with it. It was clear then that AIP would not improve efficiency and it would have been outside your authority to impose. Your latest consultation is equally complex, introducing additional report material (a lot of it incorrect) and setting out a different logic. Your arguments were fundamentally flawed, you have so far failed to listen to the users (who are well qualified) and now you are trying to shift the goalposts! Ofgem would appear to be displaying all the worst characteristics of a typical government quango!!

The technical data that Helios collated for you contains numerous material inaccuracies. Helios is not an independent analyst but actually a subcontractor of yours employed to support your proposals. I glide from Lasham Airfield in Hampshire where we do not have an approach frequency and neither do we use the Farnborough approach frequency. We do not require visiting aircraft to talk to Farnborough – that is entirely up to the discretion of the visiting power pilot but is completely unnecessary!!

The plain truth is that THERE IS NOT ANY EXCESS DEMAND FOR AVIATION FREQUENCIES. Also, because frequencies are allocated centrally in Europe, it is not within the power of the CAA or Ofcom to 'sell' them – so your mythical market doesn't really exist.

Airfields cannot opt out of using frequencies either, perhaps going unlicensed. For safety, the CAA can oblige airfields to keep them and so the airstrip would be forced to pay whatever fee you dream up. You say that you were debarred from thinking about safety issues, which is excruciating clear from your ludicrous proposals. Every authority and expert within aviation who has so far studied the previous and current proposals say it will inevitably lead to safety concerns. In aviation we know what that means – you obviously don't!!

You might claim that you were debarred from considering safety issues but let me assure you that, should you implement these proposals and an aviation colleague or I experience a serious safety-related issue as a consequence, then you and your masters will find themselves facing the legal consequences. Your proposals are nothing more than a fraudulent and cynical excuse to raise additional revenue from taxation. Scrap your proposals and stop wasting everybody's time. Perhaps a judicial review would be in order.

Yours sincerely,

Mr Jonathan Bastin  
Private Pilot and Glider Pilot