



The British Microlight Aircraft Association's response to the Ofcom consultation "Applying spectrum pricing to the Aeronautical sector".

The respondent

The British Microlight Aircraft Association represents 4100 members operating and flying 2100 microlight aircraft for recreational and flight training purposes. Flying takes place at all types of aerodromes from farm strips to licensed facilities. Microlight aircraft are frequently flown from their home base to other aerodromes and routinely transit controlled airspace. The majority of microlight aircraft are fitted with radios and make use of radio services provided at aerodromes and en-route.

Introduction

This response from the British Microlight Aircraft Association refutes that the suggestion that the introduction of Administered Incentive Pricing (AIP) will improve the overall efficiency of the use of spectrum available to the aviation sector and highlights the possibility of an overall reduction in flight safety as a result of unsustainable increased costs being applied to the recreational aviation sector.

Promoting efficient use of spectrum

The proposal claims that Administered Incentive Pricing will improve the efficiency of use of spectrum by encouraging users to release spectrum that will become un-economic to retain. This is hoped to reduce wastage and make poorly used capacity available to an alternative user. This may be described up as pricing for efficiency.

Encouraging efficiency could be achieved at the time that use of spectrum is granted by requiring demonstration of a need and by subsequent annual audit. Users failing to make use of their allocation of spectrum could be subject to its removal.

The proposal does not recognise that an individual user may be using the minimum spectrum required for their purpose or that it is being used efficiently. A blanket charge imposed on users without individual justification cannot be demonstrated to be levied to dissuade wastage. Rather it is levied just to raise income.

Fee structure

The demand for spectrum is not consistent geographically across the UK however the importance of the availability of communication for safe operation to each individual aircraft is consistent across the UK.

Although the proposal discounts the cost of spectrum in the less populated areas of the UK it makes no individual justifications or assessment of effective use of spectrum by individuals and therefore discriminates against already efficient users. Ultimately without individual assessment spectrum will only be available to those who can afford to pay for it even if they are not efficient users. Therefore the aim of the proposal, to increase efficiency of use, is not met.

Fee levels

The levels at which the proposal sets the fees for spectrum vary geographically but still represent, at the basic aerodrome levels, massive increases in levels currently charged. The increased charges have not been demonstrated to be based on releasing poorly used spectrum or encouraging efficiency but appear purely set to raise revenue.

Flight safety

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.

The British Microlight Aircraft Association opposes the introduction of Administered Incentive Pricing on the aeronautical radio spectrum.



Geoff Weighell

British Microlight Aircraft Association