

Title:

Mr

Forename:

Mark

Surname:

Cass

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:

As a glider pilot, I see this proposal as serving only to reduce the number of small airfields which will chose to have radio comms. Therefore my flight safety could be reduced when making unplanned outlandings at these airfields as I will have less information available to me in terms of executing a safe circuit approach and landing. Glider pilots already pay for their aircraft radio licence such that they are able to ask for this information from small airfields.

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

No. Fees will discourage use of radio on small airfields such as those used by gliders and so without this facility flight safety may well suffer.

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?:

N/A

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

Yes.

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

No. Radio comms improve flight safety. Any charge for this is a tax on flight safety.

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?:

No comment

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?:

Phasing in a tax on the use of radios at small airfields merely represents a delay in compromising these facilities which contribute to flight safety.

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.:

The revenues raised from these unjustified charges should not be prioritised ahead of flight safety. Any accidents which occur as a result of small airfields being unable to

afford these charges will have a greater financial impact to the state in terms of emergency rescue services, hospital treatment and accident investigation than the state may raise through charging for these radio facilities.

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.:

No. When faced with these charges, many small airfields will have the choice of withdrawing their radio facilities or increasing their landing charges such that they become unviable. In effect, they will be forced between a choice of closing down or doing without a radio and in most cases will choose to do without radio. In many situations this can only represent a step back in terms of flight safety.