

Title:

Mr

Forename:

mungo

Surname:

chapman

Representing:

Self

Organisation (if applicable):

Aircraft Owners and Pilots Association

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. They should not attract fees. VHF frequencies in aviation benefit flight safety. By charging for licenses you will encourage people and organisations to stop using radio, which will lower safety.

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?:

Yes.

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.

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.

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?:

See the answer to Question 1

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.:

No.

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.:

I do not think you realise the pressure that the General Aviation (light aircraft aviation) sector has been under in recent years. Other licensing fees have gone up considerably. Your proposed charges will hammer another nail in General Aviation's coffin.

I understand from an AOPA (Aircraft Owners and Pilots Association) article, that your reason for charging (taxing?) frequencies, is that there aren't enough frequencies to go around. However, if the 27 European frequency allocation offices were centralised, and the frequency allocation centralised, there would be more than enough frequencies to go around. Apparently most countries favour this approach, but not Britain. Why ?