

Title:

Mr

Forename:

Jeremy

Surname:

Curtis

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:

The ethos of charging for an international spectrum which is deemed 'safety-of-life' by the report authors is appalling. As the spectrum could not be used by anyone other than Aviation, the proposal to charge appears to gain nothing in real terms.

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

No. The spectrum in question is set in international law for aviation use around the world. To be charged to operate within that spectrum is simply a methodology to impose a tax for those who can afford to pay them.

The safety of all aviation, be it General or Corporate will be directly impacted as a result.

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?:

Strictly no. Almost all frequencies can be used by aircraft for safety-of-life calls, apart from those such as ATIS. In fact many emergency calls are on the channel last in use rather than switching to a dedicated emergency frequency.

As such, the majority of frequencies can be classified as potential distress and so should be free. That said, the services such as ATIS keep use on the frequencies lower, thus enabling a greater chance of an emergency call being received by those who need to hear it.

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?:

Not directly. Sporting events require the approval of the CAA, as such charges are levied for the handling of such events to ensure the safety of those participating and those watching.

Any allocated frequency would be 'administered' as part of that process and not by another third party, such as Ofcom.

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. The imposing of high (or any) charges only goes to discourage the adoption of such safety-of-life systems.

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?:

The phasing in of charges does nothing to impact that the charges are applied at all.

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.:

What would the impact of NOT paying the administration fee, but continuing to use the frequency? As the frequencies are safety-of-life, can you be prosecuted for failing to provide such a critical service because you have not paid the fee to provide it?

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. The safety-of-life implications have been totally ignored, as they fall outside the remit of Ofcom.

Given then an airfield could, potentially, not afford a frequency for a year what would happen to it? If it were re-allocated to another, then it would require EVERY document to be changed to reflect this change for that airfield published or carried in the air, stored in navigation databases and charts. If they then re-join the scheme, that would be another change of EVERY document to do with that airfield. If the frequency would just remain dormant - what would be point of barring the frequency from use by not paying the fee?