

Title:

Mr

Forename:

Peter

Surname:

Gange

Representing:

Self

Organisation (if applicable):

General Aviation pilot

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:

This response is made from an iPhone my only access to read and respond to the somewhat hefty consultation document. Had I been aware of it I would have responded sooner and more extensively.

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

No, they take little account of the General Aviation (GA) community who fly as a sport for pleasure.

As a general comment I am against the current trend toward over government used as a form of added taxation which limits the availability of such sports to the very rich.

O say this as a pensioner.

The term 'incentivised' in the title is a misnomer - why not call a tax a tax. It doesn't incentivise me.

The real problem with GA is that it is being assaulted by additional costs, regulations, impositions and interference at every turn. We wish to be law abiding but this sort of approach makes it ever more difficult. I do not want to see corners cut by any pilot, but this sort of penalistic taxation for no perceptible benefit 'incentivises' such a foolhardy approach. As currently proposed it will in the bigger picture most certainly have adverse safety implications.³

the provision

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?:

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

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

Yes, however I cannot agree with your definition of sporting as being restricted to 'non engine' - where did you dig that up from? GA is recreational and sporting and they will be heavily affected. The proposed fees will be prohibitive for any number of GA (and other medium sized) airfields who will simply drop their Ground to Air radio - a measure that will immediately pact on safety.

The proposed fee increase, from around £30

(?) to £2600 pa, phased or otherwise is disgraceful. Small airfields, given loss of radio could well decide that the safest thing is to close.

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?:

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?:

No, it is the level of the fee that is wrong- phasing is simply a political nicety. If you are intent on destroying GA a lethal injection is preferable to garroting!

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, only the sure fact that for a number of years now (and admittedly for a variety of reasons) my annual flying hours has steadily dropped as prices have continued to rise. That linkage is very real. This move is but yet another nail in the coffin.

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, suggest that you look at specific types of GA airfields and their income. To understand the impact before proceeding further.