

Title:

Mr

Forename:

nigel

Surname:

hitchman

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:

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

No, they are extremely excessive and bear no relation to any benefit gained by paying the fee. This is just a tax for no justified reason and should be withdrawn immediately. OFCOM have been told in previous consultations why this approach is

unreasonable and inappropriate for an internationally regulated safety system but do not seem to listen.

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 but the pricings are inappropriate and unacceptable.

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

NO. There should be no charge for any frequency use when it is used for air safety and air traffic control, airfield air to ground radio etc are just as important to safety as Fire assignments

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

No there is no justification for this.

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?:

This seems inappropriate as ACARS uses ground stations that are already there and in many countries. How would you propose for example charging all foreign aircraft which use ACARS over the UK including those that dont land in the UK. Again this is just a fee for the sake of it with no justification

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 fees would need to be phased in over a very long period, free for at least 30 years. They are totally unnecessary for aircraft radio stations and provide no benefit, so delaying implimentation would be prefereable from a flight safety point of view.

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.:

You have not taken into account the financial impact due to the reduction in flight safety due to increased costs of the airfield radio stations, if these put costs up people might fly less and thus not practice their skills and make their flying less safe, OFCOM would be liable for this and any accidents that happen as a result. OFCOM would also be liable for an accidents resulting from withdrawing an airfield radio station due to the cost of having to pay for it, which is unrealistic for many small airfields.

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 not at all. Ity is fundamentally flawed, particularly in the case that if your pricing forces people to give up a radio frequency, it wont be available to the highest bidder, because it could only be used in an area near to where it was used before due to interference, so is only really likely to be re-allocated abroad, so a loss of flight safety in the UK and no revenue for OFCOM!! Loose loose situation.

The CAA has already confiurmed there is no excess demand in the UK so the basis for OFCOMs proposals are totally flawed.

Instead of wasting all this money on these proposals to try to tax aeronautical freq users, the money should have been saved by scrapping the proposals and closing down OFCOM.

This proposal is a disgrace and seems typical of a government agency trying to justify its position and get money from people for no benefit whatsoever.