

Title:

Mr

Forename:

Paul

Surname:

Jones

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:

Please do not publish my email address.

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

No, my reason being that you have not indicated who or what organisations wish to use the frequencies that will be freed up (presumably) by pricing certain facilities off

the air. Additionally, the 9,999.00 charge for ATIS frequencies is simply outrageous. ATIS information provides vital flight safety and key information for pilots. Smaller airfields will simply not be able to afford such fees, requiring pilots to consume controllers valuable time obtaining such information. Flying taxes are already excessively high - this measure is simply yet another tax.

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 of course.

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

Yes, but you have not really explained why these frequencies are required to be freed up - for whom?

Have you explained how much of the fees will simply be used in administration costs ie to simply pay administrators of the scheme.

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- how did you arrive at this figure? How can such a fee be justified? These are absurd amounts of money that will lead to the closure of airfields or make them less safe.

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?:

I do not think the charges are appropriate. If Government insist on bringing in such charges a 10 year programme would be more suitable. Additional operating costs of in excess of 10,000 per annum simply cannot be absorbed. These charges appear to be yet another tax - unless clear evidence of who/what is not being allocated a frequency.

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.:

I have an MSc in Airport Management but it does not need an MSc to figure out that these charges will have to be added to all airport/airfield operator's costs or simply the frequencies/services will not be provided - which would be fine if there were not safety implications. The long term effect on the industry would take considerable study but the simple facts are that a substantial additional financial burden is being placed upon operators of airfields when GA, business and commercial flying sectors are struggling as airlines, flight schools and GA declines year upon year - CAA has quantifiable data on the decline of all aviation areas.

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.:

Why are you charging at all? Why not limit the number of frequencies allocated? You have not provide information is effected adversely by the 'scant resource'. Be honest this is simply a money revenue scheme but I expect much of the revenue will be taken by administration costs - are you willing to publish your assessed admin costs to collect the fees etc?