

**Title:**

Mr

**Forename:**

John

**Surname:**

Milner

**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:**

Spectrum pricing is NOT a good way of fostering efficient use of spectrum, merely a way of allowing those with deep pockets to hoard it.

In the case of the aeronautical spectrum it is reserved by international agreement and so cannot be reallocated outside that use.

There are well ordered systems in the UK (and elsewhere) for allocating scarce

spectrum through co-operation and technology development these proposals will put that at risk and almost certainly REDUCE the efficiency of spectrum allocation.

This exercise is therefore entirely misguided

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

No! There should be no change to the existing arrangements. AIP is NOT a useful way to improve efficient use of spectrum consistent with safe operations.

The industry has a good track record of engineering practical compromises. AIP will turn co-operation into competition and thus impact safe operations across a wide spectrum.

**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?:**

Probably not

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

Yes since I do not see any case for AIP at all! However this rather weakens the overall case for fees being a good method of allocating spectrum, rather than priority allocation by experts!

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

The logic of this decision escapes me unless it is intended to placate one group of protestors by suggesting a relatively modest fee.

**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?:**

It's an arbitrary figure as are most of the other fees so why is it singled out?

**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?:**

There is a need for a phasing period of at least a decade during which an evidence base to show that AIP achieves its stated goals without compromising safety must be built. Unless this evidence base can be built AIP should be abandoned.

**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.:**

We know that many aerodromes operate at the margins of viability and any cost increase is to be deprecated.

**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 I do not. The documents do not make any convincing case that AIP will be a better way to increase efficiency of use of spectrum than existing arrangements.

The proposals re "Safetycom", which is analogous to Unicom in the USA do not take into account the density of traffic and aerodromes on this small island particularly in the South East. If the proposals have the effect of moving substantial numbers of small aerodromes in the South East from dedicated frequencies to Safetycom, the result will be lethal confusion.