

**Title:**

Mr

**Forename:**

Paul

**Surname:**

Adams

**Representing:**

Organisation

**Organisation (if applicable):**

Ministry of Defence

**Email:**

[cio-j6-ops4@mod.uk](mailto:cio-j6-ops4@mod.uk)

**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:**

MOD uses VHF assignments in the 117 ? 137 MHz band to communicate with civil and military aircraft. MOD?s use of VHF spectrum is essential for its task in the UK Joint and Integrated Airspace. Further, MOD requires VHF spectrum to support the

operation of the Lower Airspace Radar units which is an integral part of the UK airspace. Significant costs introduced by Administered Incentive pricing in this band could force MOD to reduce its use of VHF assignments which could fracture the integrated approach to airspace within the UK and negatively impact the existing agreements with the CAA.

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

**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?:**

**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?:**

**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.:**

**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.:**