

**Title:**

**Forename:**

**Surname:**

**Representing:**

Self

**Organisation (if applicable):**

**Email:**

**What do you want Ofcom to keep confidential?:**

Keep name 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:**

The Ofcom proposals are clearly an attempt to introduce a substantial tax on the use of the aeronautical radio frequencies. If introduced the effect of these taxes would be to very much restrict the use of the aeronautical VHF band by general aviation, something that is very possible since the vast majority of this sector operates under the visual flight rules. However, whilst not necessary, the use of radio is most certainly a major aid to flight safety and the introduction of the proposed taxes would undoubtedly reduce safety and inevitably cost lives.

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

Absolutely not. Ofcom fees should continue only to fund the administration of aeronautical radio licences. The aeronautical VHF spectrum belongs to no-one, least

of all to Ofcom nor to any other government agency. The suggested scheme of charging is inappropriate if not immoral, especially when the overriding concern must be the maintenance of flight safety. Were this tax to be introduced flight safety would most certainly be compromised...see the additional comments above.

**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.:**

No. As detailed above there has clearly been no consideration of the effect of the proposed tax upon flight safety. In addition, due to the general economic situation and the resulting permanent readjustment of the economy of commercial aviation, an additional tax upon this sector will have only one result and this very definitely will not be beneficial! It appears that Ofcom have taken very little account of the effect that their proposals would have, if implemented, upon both general and commercial aviation. Rather, the agency appears to have only one major consideration - the dramatic improvement in its revenue!

