

Title:

Dr

Forename:

John

Surname:

Owen

Representing:

Self

Organisation (if applicable):

and for the Popham Flying Group

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:

Increasing the cost of radio use for GA is unacceptable. GA airfields are hard pressed and GA pilots already suffer from excessive fuel costs and many GA pilots have had to give up flying because of the price rises. The combination of all the regulatory bodies increasing the complexity and cost of GA aviation is making the UK and Europe in general a very unfriendly place.

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

No - there is absolutely no justification to charge GA airfields a large tax on radio use. It would be like charging a large extra tax on fishing line - or any other form of sport equipment. £2,600 is way ? way too much for a small general aviation airfield with no commercial traffic. In addition if aircraft themselves were be charged an extra tax of this kind many pilots would abandon using radio altogether with the consequent safety issues. In addition the relatively small number of GA airfields in this country will mean that in revenue terms any amount raised would be relatively small. So in short it will be viewed as very mean and unjustified.

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?:

No -

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 - The effect on GA airfields, costs for GA pilots and all knock on effects of these increases has not been properly considered.

GA is a small section of the aviation world and it is always on a knife edge between survival and failure. Proposals like these can only push it towards becoming extinct and then even the very rich will have nowhere to fly or learn to fly. There is really nothing to be gained from attacking the little man just so that you can say that you believe you have a so called fair scale