

Title:

Mr

Forename:

Michael

Surname:

Parkin

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:

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

No. You plainly have no concept of aircraft or airfield operations.

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?:

No. Not in the least.

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

Yes. It should apply to all aviation vhf spectrum users.

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

No. You appear to see sport aviation as a rich person's pastime. In general it is not, at my local airfield every aircraft based there is worth less than the cost of a new 'average' family car. You will affect safety.

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. This will not optimise the use of the spectrum. It is a stealth tax, pure and simple.

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. Your plans are totally inappropriate, based on poor understanding and misleading facts.

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.:

No.

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 not at all. Consider a small unlicensed airfield with 5 resident aircraft using a shared A/G frequency. Do you really expect that airfield to pay nearly £3000 for the use of that frequency.... this is not realistic. The airfield will just operate without radio facilities. If the CAA legislate to force radio usage, it will likely put the airfield out of business. The result of your 'stealth tax' is either a degradation in safety, or a loss of the local facility. I hope you are prepared for the first court case when your intervention affects safety.