

**Title:**

**Forename:**

**Surname:**

**Representing:**

Organisation

**Organisation (if applicable):**

The Pilot Centre Ltd

**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:**

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

No. The transmitter power for the A/G service at my base airfield Denham is limited to just 5watts maximum, and the DOC is just 10nm / 3000' whereas Luton AFIS is 60nm / 20000'. If the reason for AIP is radio spectrum congestion, then clearly charging the same for Denham A/G and Luton AFIS is inappropriate.

**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?:**

The fire service at Denham enjoys no dedicated frequency. The fire service relies on the airfield A/G VHF frequency which is therefore a part time fire assignment. If similar 'efficient' multi use assignments are eligible for 'no charge' then I would agree with this proposal.

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

No. These sporting frequencies seem to have similar characteristics to A/G frequencies in terms of transmitter power and DOC. It therefore seems unfair to charge the latter over 3000% more.

**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.:**

OFCOM has said it wants to reduce spectrum demand particularly where most of the airfields are in the South East. Most small airfields only have one frequency, and some like Denham are compelled to have a radio frequency by the CAA because of their location. Their scope for reducing spectrum demand is clearly just about zero. I suggest airfields be allocated one free frequency, and charges only begin when additional spectrum is required.

**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.:**

I'm afraid I believe this is merely an extra stealth tax, which has very little to do with better management of the radio spectrum. If Britain wants better coordination of the spectrum, it should push for a single trans Europe Management Office, similar to the Office of Spectrum Management (OSM) in the US.