

Sir,

I am replying to the second public consultation on the above subject. I write as a private pilot and aircraft owner in the UK , with a VHF licence both as part of my PPL and for the installation of a VHF radio in my aircraft.

I TOTALLY REJECT YOUR PLANS TO CHARGE FOR THE USE OF AERONAUTICAL VHF FREQUENCIES, and support the LAA response to you.

I have read the paper put forward by HELIOS and find it sad that a company based next to Farnborough Airfield does not appear to have visited one of the top Control Towers in the country to get a better understanding of how the airband frequencies work. Their report is flawed and based on misinformation or at worse, intent to mislead. They have not understood how airband frequencies work, they have completely missed out Air to Ground frequencies and the Safetycom frequency and there is reference to excess demand but nowhere is this quantified or explained.

I have been listening in to Airband radios for over forty years and have used my radio licence for nearly the same length of time. As a private pilot I am at liberty to fly nonradio in the open FIR but chose not to as this would compromise safety. Indeed the biggest improvement to air safety in the South of England has been the introduction of two extra frequencies for Farnborough LARS in order to aid pilots outside of controlled airspace(CAS) (as applies to Heathrow and Gatwick) and so prevents CAS infringements by open FIR aircraft. All of this was put in place by the CAA as a direct benefit to the Airline Industry and the fare paying public, with private fliers like myself being encouraged to use the service for its efficient and safe use. Perhaps the airlines would like to pay the fees for these frequencies.

Turning to the smaller airfields that I fly from, my own base (Popham) runs an air to ground frequency manned by volunteers (unpaid), and the field is one of the most popular around the South Coast and seeks to maximise the income for its owners by encouraging flyins at weekends during the year. It could not handle these safely without radio and therefore would be likely to close down and remove a facility and livelihood for those working at the airfield, all for whose benefit?

You do not indicate how the money raised is to be spent but an income of £7.4m at max return is not a large sum especially when Helios suggest that this sum should be discounted by 40% in view of their flawed assessment of congested airwaves. It is especially not a large sum to cover the cost of lost lives which could occur due to the loss of radio frequencies. How much of this money is needed to keep your QUANGO going?

You mention technical developments and there is no doubt the many advances being made, most of them in the USA and then sold into the UK and Europe. I use GPS navigation (not ADF or VOR technology, as this is being phased out in many areas), I would happily use ADS-B rather than Mode S but Europe is lagging behind the rest of the world. VHF radio remains a constant although I already know that I will be forced into paying out £3 to 4,000 in the next few years to upgrade my radio and transponder for other peoples benefits, certainly not mine.

To conclude. Safety WILL be compromised by this proposal of yours. You cannot go against International treaties which govern this area and you cannot cost Aeronautical frequencies as if they were radio 1 or 2. If you want to improve on radio use get the BBC to move radio 5 etc across to the VHF band as I cannot get good reception here in Hampshire, less than 50 miles from London.

Yours

Steve Pitt