

Title:

Mr

Forename:

Christopher

Surname:

Pratt

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

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?:

Yes of course

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

No

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

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 fees

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.

The main thrust of your argument for applying pricing to the use of the aeronautical spectrum assumes market forces in a congested sector will result in the release

frequencies for re-use. .

Congestion. According to the LAA who have asked the CAA how many unfulfilled frequency allocations existed, were advised that there were none. Congestion driving market forces?

Frequency allocation. Whilst we live on an island the CAA is not free to allocate frequencies as they feel fit ? they have to work with our neighbours (particularly in the SE of England) to avoid same-channel interference. VHF signals also have the annoying habit of ducting, particularly over water and during anti-cyclonic weather causing signals to travel considerably more than line of sight. So a ?market force? released frequency from say NW England may not be able to meet the insatiable demand in the SE as it may be in use just across the channel.

I have experienced French stations on the previous frequency of Sandown (which had to be changed) and a Midlands airfield frequency the same as used at Compton Abbas.

Such interference impacts SAFETY.

Your proposal for the spectrum pricing appears to be a very poorly thought through on a needs basis so I assume it is merely another taxation on aviation.