

Title:

Mr

Forename:

Peter

Surname:

Rafferty

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?:

The question is loaded, you have identified the uses of VHF aeronautical frequencies, however in my opinion they do not require this change to the fee setting.

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

Yes.

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

Yes.

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, the approach seems to be entirely designed to generate revenue without and real consideration for the safety impact of the proposals. For the most part, General Aviation airfields in the UK do not make large if any profits, by imposing large fees for relatively basic aeronautical services the airfields would have a choice of - absorbing the cost, passing the cost on to the users, or releasing frequency attached to whatever service is provided. If the service is reduced, then this removes an additional layer of safety and control in the entire aviation process.

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. I recommend that independent, experienced general aviation industry consultant, preferably with experience in accident investigation be used to consider the safety implications of the possible loss of these services as a result of pricing the frequencies out of the reach of many operators. General aviation frequencies should be considered safety critical and priced as such, and not turned into cynical revenue generators.