

Title:

Mr

Forename:

M

Surname:

Sapsed

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:

Primarily this is a tax on safety. There is no apparent excess demand for frequencies. You claim to be targetting excess inappropriate use, but actually you aim to tax all use. Where charges are felt to be excessive aerodromes will simply give up the only frequency they have and safety will be impacted. In many cases the CAA will veto this decision and this the operator will have no choice but to pay the fees proposed. The air spectrum is defined by ICAO and thus cannot be sold to the highest bidder.

There is no indication where the fees will go and there is absolutely no benefit to anyone from pricing an isolated A/G station out of existence.

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

Not in general and especially not in the case of proposed charges for A/G and AFIS. You suggest that costs can be recovered from paying passengers. In the case of A/G & AFIS most aircraft will have a pilot and perhaps 1 passenger. In this situation a 26-fold increase in fees seems excessive to say the least.

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?:

There is a big difference between Twr use at large airfields and AFIS or A/G use at smaller ones. If the proposals go ahead, this distinction should be made.

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

Yes, but AFIS and A/G operations are solely for the purpose of safety as well.

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

If you must, but these frequencies may become de-facto operational facilities near airfields forced to abandon their own frequency.

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 comment

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?:

Unless the phasing in period is very long, a 26-fold increase in fees for operations which are barely financially viable as it is will be hard to take.

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.:

I do not have access to actual figures at small airfields. I do know that the extra £2500 you're proposing for A/G will have to be paid by the likes of myself somehow.

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. Your proposals, especially in respect of A/G and AFIS operations at smaller airfields will result either in those airfields ceasing to provide a radio service, with a direct impact on safety, or the CAA will mandate they retain the service with a resulting significant increase in costs to the airfield and private pilots. Increases in costs to private pilots results in decreased frequency of flying with a resultant impact on safety.

If you wish to target "excessive" use then you should establish a baseline of "essential" use for which you do not impose punitive charges. All airfields with a single frequency should be classed as essential and thus exempted from this tax.