

Title:

Mr

Forename:

Keith

Surname:

Taylor

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:

Yes

Additional comments:

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

No, I consider some are extortionate and will compromise Safety. Small airfields will give up the ability to communicate with aircraft and there will be a high risk of conflict between aircraft in the air and on the ground.

The high cost proposed for ATIS will encourage airfields to discontinue the service,

necessitating more communication with ATC using valuable time that could be devoted to controlling aircraft.

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?:

No, all that has been done is to propose a fee structure imposing high costs on airfields and communication facilities with an impact on safety.

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

Yes as with all emergency services.

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

No. If these are frequencies for general use by any type of aircraft they are unnecessary. If these are temporary frequencies to be allocated to special sporting events eg RED BULL Air racing, then there is no reason why charges should not be imposed, as this is a commercial operation and can accommodate the fees as any other commercial sporting occasion.

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, this is an unnecessary annual cost

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?:

The fact that there is no reason to impose these fees does not support any phased imposition. These extortionate charges simply add further impact to other charges imposed on the general aviation operators.

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, but it is unclear how the costs were reached for each category. What administration costs require £9900 for ATIS? Why is it necessary to charge a small airfield with limited movements £2600 just to communicate and provide safety to aircraft.

It seems these costs are simply set at punitive levels to force operators to relinquish frequencies, that Ofcom can then sell on to the highest bidder.

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 do not consider full assessment has been given to safety implications. All the responses from Ofcom to industry experts seem to dismiss the fears, and claim that all the operators can simply absorb these costs. It is particularly noted that the unlicensed airfields which have no commercial operations, will be perfectly able to accept the charges. On what basis did the consultants come to this conclusion. Where do they assume the income will be other than from the recreational flyers that use the facility.