

Sir,

In reviewing these proposals it is clear that the consultants have been given parameters to review the facility for profit not safety impact. Ofcom is a monopoly Quango which sees the opportunity to profit from the use a medium that offers a considerable safety benefit. A price or value cannot be attached to that..

Helios is a commercial enterprise which offers many services managing radio facilities, for profit, and therefore their report, is biased toward that rather than the more important aspect of aviation communications which provide safety. In the air if one cannot communicate with the ground the implications for conflict are enormous, and safety is compromised. Nowhere is this more true than in the vicinity of airfields or airports, where many aircraft occupy the same restricted airspace.

It is claimed that the incentive pricing will force users to employ the limited resource more efficiently, releasing frequencies for the benefit of other citizens. Who are these other citizens if they are not of the aviation industry. It can only be European companies that are willing to bid for the frequency, possibly billions of pounds as with the mobile phone bands, but for whose benefit other than OfCom. Thus they can then claim how productive and profitable they are to justify huge bonuses for the managers.

There is no real explanation of how the charges were calculated. What justification can be made for increasing charges twenty times or more to organisations, that have no means of recovering the cost. Examples are the small non-commercial airfields which provide a facility to recreational flyers. In this case they will simply close the frequency, providing Ofcom with the claim that it should be sold as being underused. As more airfields abandon their communications facility, Ofcom will load the remainder with more costs to make up the loss, thereby causing more to abandon the radio link, until all are gone. It is a vicious circle which Ofcom will claim justified the claim, that the spectrum is underused and therefore should be sold to other users.

It is noted that the charges are only to be levied on the ground stations not aircraft. Could this be because of international agreements on these frequencies that prevent Ofcom collecting on the licences for foreign aircraft, and thus it is easier to charge the ground facility and let them in turn collect for the aircraft operator should they choose. How much simpler to collect one amount from a fixed station, than to try and collect from many mobile ones.

From the report it is noted that Helios were told to assume stations were using 25kHz frequencies in assessing charges. They are surely aware that for several years now most aircraft and ground facilities have been operating with 8.33kHz, which means that efficiency has been achieved in that there a 3 times the number of frequencies available.

If as the report proposes there are too many operators for the limited frequencies, then presumably these are UK aviation companies, since it is hoped the released frequencies are not to be offered to other unrelated industries. If efficiency is required, then why not allocate the same frequency to two airfields which are over 100 miles apart. I know of several situations where this exists. Blackbushe until

recently operated on the same frequency as Sibson, and although in certain conditions there was conflict between the two it was not a major problem. It should not be beyond Ofcom wit to arrange greater separation.

The proposals show nothing but the usual desire by a Quango to interfere in a facility that has managed well enough to date. They see huge profits to be made under the spin of opportunity costs and value by forcing the current operators to pay increased fees or release the frequency, so it can be sold to the highest bidder. How many of the Helios consultants are pilots or aircrew, and fully appreciate the safety impact of their report?

- What extra cost is incurred in administered an ATIS frequency as to a non-commercial airfield frequency that justifies a charge difference of 3 times?
- An ATIS is a valuable and beneficial safety frequency at busy airfield. It allows Pilots to obtain important information of a standard nature without imposing on the ATC time. It is a critical maxim taught to all pilots not to utilise Tower or Ground frequencies unnecessarily, as it may prevent an emergency call being made. The imposition of a high charge will cause airports to stop providing ATIS thus necessitating Pilots to communicate with the tower.
- Small non-commercial airfields will experience great difficulty in meeting the charges, and therefore likely to close their radio communications with aircraft. This is most likely at unlicensed airfields. In this event are Ofcom intending to prosecute/fine any pilot who with the desire to help fellow aviators communicates with other aircraft using a handheld Transceiver?
- Commercial operators and business aircraft will probably be able to pass on the charges, but not the small and private airfields where there is not ability to absorb the high charges so they must be passed on to the recreational flyers along with all the other increased costs being imposed by Government and CAA.
- The report comments on Incentive pricing, Opportunity costing Value to the community, Benefits to other citizens and society with the introduction of increased costs. Who are these other citizens? Who in society will benefit from the money generated? What will be the benefit to the community? Who will take responsibility for the risk to safety that the lack of the ability to communicate will cause. I presume any accidents will be attributed to pilot error!
- Under para 1.18 it is reported that the Spectrum use is relatively small. Why then are punitive charges to be levied and compromise safety and convenience?
- It is reported that the charges will also be imposed on Military and airlines, but they use UHF and HF respectively. The VHF is more common in general aviation where communication is paramount because they lack the sophisticated aids to conflict avoidance. Thus these charges will again impact on safety.

This report has been compiled by consultants who have been given parameters to work to that are biased toward generating income for the monopoly Ofcom, and not enough emphasis on safety. The comments on the objections from involved aviation organisations are too dismissive with a reply that all will cope and absorb these charges

These proposals will do nothing to benefit aviation, society or the community and are only for the purpose of generating income for Ofcom either through high charges or the sale to overseas organisations.