

Title:

Mr

Forename:

Neil

Surname:

Thomason

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:

I find it difficult to believe that with the move to 8.33 KHz spacing that there will still be contention for frequencies. Three times as many frequencies available with no step change whatsoever in usage, and this is after moving from 50 KHz spacing not so long ago, during which time the basic infrastructure of air to ground communications has not changed. Indeed airfields seem to be closing faster than opening ? Sunderland, West Malling, Dunsfold ? and military bases are only going in one direction - Greenham Common, Upper Heyford, Abingdon, Bentwaters, Woodbridge, not even

converted to civil use.

Para 1.11 stating that fees will be reduced pro rata when 8.33 KHz spacing comes in is consistent a revenue target rather than a market pricing model as claimed. In the early days, at least, with 3 times the number of channels, contention will be reduced to virtually nothing or nothing.

Whilst many airfields have in the past not used radio, there are some safety aspects improved with radio. At Brimpton specifically, these are

? Use of the movement area necessary for ground manoeuvring in some circumstances
? A conventional deadside join is not possible because of the Aldermaston zone
? Ability to perform a radio check, prior to launching off and calling more formal stations is of significant value.

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

2. Levying the same charge for an ATC service versus an A/G radio seems unrealistic even though the radius of operation is similar. If the contention argument really stands up then I would suggest adopting a free Unicom / 123.50 common frequency for low traffic density a/g stations at unlicensed airfields as with the shared sporting frequencies. Having used this in France and the USA it is perfectly workable provided one keeps repeating the name of the airfield at which one is operating, eg ?Brimpton G-KT finals runway 25 Brimpton? . I would reiterate the extremely low density of traffic at Brimpton, and presumably other ground stations opting for a Unicom alternative.

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?:

cannot comment

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

No. If this is because of a safety issue with this assignment, it also applies more generally to genuinely aeronautical uses of the aeronautical frequency band.

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

Yes but one to be made available for a/g at unlicensed airfields also.

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?:

Seems a bit high.

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?:

Phasing in is a good idea provided that, as stated in the consultation document, this allows for continued consultation.

However para 7.52 is difficult to understand, we are not given the opportunity of "less usage" to save cost, only cancelling the service entirely.

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.:

In view of the lack of contention when 8.33 KHZ channel spacing is introduced and therefore zero AIP implied pricing, this whole exercise seems a costly waste of time at this point.