

Title:

Mr

Forename:

David

Surname:

Trouse

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. The whole proposal is ill thought out, self contradictory in several aspects and will not product any benefit to the UK. The spectrum is not available for reuse being reserved internationally for aeronautical use. This proposal looks like a tax on the users some of which will hardly notice because the cost can be charged across a vast number of customers. Others (small airfields) will find that the large per user costs can not be so easily recovered.

The proposal acknowledges that pricing and safety considerations do not fit together well and just passes this problem on to the CAA whilst making a token gesture regarding pricing of emergency frequencies.

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?:

Probably.

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

Yes, though there is no good rationale for doing this compared to the proposed prices for other safety related uses (ie most other frequencies).

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

If AIP for aeronautical frequencies is unavoidable then setting a much lower fee for sporting frequencies is a least worst proposal. However, once again there seems little consistency in the arguments. Why should a gliding club and a flying club be treated in different ways?

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?:

The whole idea of phasing seems to be implicit acknowledgement that the proposal is flawed and likely to have adverse impact on the aeronautical sector.

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.:

Sorry no quantified information just the feeling that any further 'tax' on general aviation can only further hinder its financial health and future in the UK.

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.:

I think that the proposal has not paid sufficient attention to the international angle. Because this spectrum is internationally reserved for aeronautical use it simply can't be reused for other purposes. Any reduced use in the UK will just be reused by nearby Europe. If the real goal was efficient use of this spectrum we'd be pushing for fully internationally controlled frequency allocations. As it is this proposal just looks like a tax dressed up with dubious logic.