

Title:

Mr

Forename:

Chris

Surname:

Trow

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 - for several reasons. The primary use of radio in aviation, especially general aviation, is as a safety tool - as such it should be a freely available tool to all aviators - imposing a charge would mean that a large percentage of pilots would simply stop using it with predictably bad results.

Ofcom are quoted as saying they are debarred from considering safety as an issue in this matter - in which case they should stay completely out of any involvement with aviation. The aviation world cannot afford to be regulated by any organisation which does not have safety as its primary mandate.

Additionally, the frequencies in use in aviation are agreed internationally and should not be available to any random organisation to offer for sale - out of interest, where would the proceeds be spent (I doubt they would be used to help reduce the already high cost of general aviation or offset the inevitable increase in fares in commercial aviation that these charges would cause).

It is hard enough, especially in the current economic climate, to keep smaller airfields and training organisations going without levying additional taxes on an already struggling industry.

The whole thing is about as ridiculous as charging for seatbelts in an airliner !!

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?:

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

Only in as much as I would agree with any proposal NOT to charge.

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

No - see point 1 above

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

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?:

I cannot see any aviation group who will benefit in any way from any of the proposals - it is bad enough that GA no longer benefits from fuel tax relief without making the whole process of flying even more expensive

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.:

The vast majority of airfields already suffer from the effects of the British climate which tends to produce an average of 3-4 flyable days per week or lower.

The charges you are proposing would affect 100% of aviation users but only a very small percentage (probably sub 2%) are large enough organisations to consider the fees you are suggesting as anything other than exorbitant.

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.:

It does not appear that your 'assessment' has even acknowledged that a vast sub-section of aviators and aviation organisations fall into amateur or low income professional people who do not have the turnover to pay your proposed fees. Additionally, many private pilots may only fly for some 10 or 20 hours per year. In this case, your fees (when considered per hour) are even more scary.

You should carefully consider how many people, who are not professionally involved with aviation, you will directly affect with your proposals - and then keep radio FREE as it should be !!