

**Title:**

Mr

**Forename:**

David

**Surname:**

Weston

**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 responded to the original proposal, and my comments are largely the same.

However, I would like in this case to express my concern over the Helios report which I found confusing and hard to understand.

In particular, the mechanism they suggest for reductions on charging based on OS grid squares.

For example, Newquay and Perranporth airfields are in the area which attracts a discount. Airfields such as Eaglescott, Branscombe or Belle Vue in intensely rural areas do not. There seems to be no rhyme nor reason for this approach apart from a superficial overview.

I suspect that the consultants did not fully engage with airfield owners at the low end of GA. Consequently I feel that your pricing policy is seriously flawed.

I will repeat my, and other respondents comments.

You are proposing a further tax on aviation, especially at the low-end of GA, who are already suffering from massive hikes in costs from government agencies.

Although the costs may appear small to you, they all add up and make the difference between viability and bankruptcy.

You have wilfully ignored the fact that radio is an essential aid to safety, and we do not use it as a chat facility like a mobile phone.

Airfields share frequencies - 122.70 is used by Bodmin, Compton Abbas and Sywell. Because of its limited range it is possible to use frequencies efficiently.

There is no market in frequencies, but if charges result, then some airlines may well buy a frequency rather than a small GA field.

The company may be willing to pay for additional frequencies for company communication - it comes from passenger revenue - but it would no longer be a safety facility for light aircraft.

Is that really what you want? To make light GA more hazardous so that the frequencies can be bought by airlines?

I sincerely hope not.

So in conclusion, your consultation is flawed, goes against safety and your proposed pricing regime excessive.

Please could my response as being wholly against your proposal

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

No.

Whilst there is some reason for charging commercial operations (eg company frequencies), in the majority of GA there is no reason (apart from revenue gathering) for increasing charges to the level you propose.

As many others have said, we only use our radio for safety purposes , and, as such,

the fees should be set at such a rate that it encourages use.

The CAA are adamant that to avoid airspace infringements, GA should be talking to as many people as possible. Your proposal runs counter to this.

**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 comment

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

Yes, but this should also apply to other sectors

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

Yes, but how do you intend to charge for Safetycom?

**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 proposal to hike an A/G frequency at our local airfield to £2600 is outrageous. The only source of income is from landing fees, and this will damage the profitability of the airfield, especially in such straightened times.

**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 comment

**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.:**

Absolutely not.

Your proposal seems to ignore completely or discount all previous objections and comments in favour of revenue gathering.

You comment that safety is an issue for the CAA has led to great anger, as it would imply that you would use the CAA to mandate continued radio usage and so the charge would become an unavoidable tax.

You have failed to take into account that radio, though a fantastic safety facility, is optional. We can choose to go non-radio if the costs become excessive. So, as others have said, if accidents result from airfields going silent, then we will know who is responsible - Ofcom.