

Title:

Mr

Forename:

Nicholas

Surname:

Wilcock

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

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. You appear to have absolutely knowledge of the core need for the aeronautical VHF frequencies.

The need is quite simple. It is for Safety of Life.

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

Yes.

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

No. The so-called 'sporting frequencies' are safety frequencies used to reduce the possibility of collision between airports participants. They are not used for entertainment or business purposes.

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?:

No. You need to accept that applying fees to Safety of Life is putting a price on life and is wholly immoral.

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.

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.:

Your assessment of the impacts of your proposals is fundamentally flawed. You have inadequate understanding of the nature and function of aeronautical radio communication; you have but one aim - revenue generation. Whereas that might be acceptable for some spectrum use, it is emphatically inappropriate for Safety of Life spectrum use. The entire 118-137 MHz band is needed for Flight Safety purposes and must remain outside the purview of your revenue generating aspirations.