

**Title:**

**Forename:**

Name withheld

**Surname:**

**Representing:**

Self

**Organisation (if applicable):**

**Email:**

**What do you want Ofcom to keep confidential?:**

Keep name 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

1) Ofcom appears to have failed to demonstrate that there is excess demand for aviation frequencies, so the case for charging on this basis collapses;

2) Since the frequencies are allocated centrally in Europe, I question Ofcom's right to sell or lease them;

3) There are serious safety concerns that should override the desire to generate income. Safety in the air should be a prime concern of Ofcom, even if Ofcom is debarred from considering safety issues. Charging for aviation frequencies will result in some airfields going non-radio and others closing;

3) The consequences in the UK's crowded airspace will be to increase accidents and cause the aviation market to go into further decline. General Aviation is predominantly for business use, unlike Civil Aviation that mainly supports leisure travel, and to hamper the business sector by further taxes is inappropriate.

**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?:**

Tables 5 and 6 do not appear in the consultation document

**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

**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?:**

No. The whole concept of fees in this sector is flawed.

**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.:**

No.

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- 2) Since the frequencies are allocated centrally in Europe, I question Ofcom's right to sell or lease them;
- 3) There are serious safety concerns that should override the desire to generate income. Safety in the air should be a prime concern of Ofcom, even if Ofcom is debarred from considering safety issues. Charging for aviation frequencies will result in some airfields going non-radio and others closing;
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