



Mr Michael Richardson
Ofcom
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BY EMAIL: Aeromar2ndconsult@ofcom.org.uk

29 January 2010

Dear Mr Richardson,

Applying spectrum pricing to the maritime sector, and new arrangements for the management of spectrum used for radar and aeronautical navigation aids – AOA Response

Given the diverse nature of the consultation, and in particular its maritime focus, this response from AOA focuses solely on Ofcom's proposals for Government to take over the management of spectrum used by radar and other aeronautical nav aids, instead of applying AIP. AOA will reply to the separate consultation on applying AIP to aeronautical VHF.

AOA strongly supports the proposal for Government to take over the management of spectrum used by radar and other aeronautical nav aids very strongly.

This transfer of responsibilities should be unconstrained. To pass on the management of spectrum to Government which is fettered with restrictions imposed by another body would be quite illogical and would remove the ability of Government to 'manage'. This will give Government the opportunity to review the provisions of chapter 7 of the Cave report, which concludes:

"Where there are international requirements which mean that the UK has no scope to act unilaterally, the opportunity cost of use is zero and there is no merit in introducing AIP for these licence classes. In these cases, spectrum efficiency measures should instead be pursued through international negotiations to update frequency allocations or adopt new standards or through the prescription of carriage requirements for more efficient technology (but again these would need to be implemented for equipment satisfying internationally recognised standards)."

AOA would argue that the 'manage not charge' approach being set out for radar and other nav aids is directly applicable to aeronautical VHF.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D Bishop', written over a horizontal line.

David Bishop
Head of Policy