

OBSERVATIONS ON THE OFCOM PROPOSAL TO APPLY SPECTRUM PRICING TO THE MARITIME AND AERONAUTICAL SECTORS

Introduction

This paper addresses the impact that spectrum pricing will have on the aeronautical sector only and has been written in response to the second consultation document published in August 2009.

Question 18

With regard to Question 18, the Guild of Air Pilots and Air Navigators agrees that if the Government were to assume the strategic role for the radar and aeronautical navigation aids spectrum, Ofcom should not and would no longer have any need to develop proposals for AIP licence fees in this sector. The Guild considers that the solution that has been proposed, whereby the Government might subsequently delegate responsibility to the Civil Aviation Authority for planning and agreeing changes in the use of this spectrum along with assessing the current and future requirements, would appear most likely to achieve Ofcom's objectives for optimal use of frequency allocation in this sector.

Aeronautical VHF Communications Employed to Fulfil a Safety Function

The Guild notes that the issue of aeronautical VHF communications frequencies will be addressed in another consultation document that will be published later in the year. However, in the light of comments and responses contained in the August 2009 consultation relating to maritime interests, the Guild considers that it may be necessary to emphasise its strong conviction that AIP should not be applied within the aeronautical sector where such frequencies are employed to fulfil a safety function, and especially where they are essential to the provision of safe separation between aircraft both on the ground and in the air.

International Obligations

As is the case with radar and aeronautical navigation aids, aeronautical VHF communications frequencies can be subject to international obligations placed upon the UK and many are allocated for specific safety applications.

Conclusion

Ensuring the continued provision of frequencies allocated to enable the safe and expeditious movement of aircraft, and safeguarding international and national obligations to avoid mutual interference whilst delivering efficiency improvements in the use of spectrum in the aeronautical sector should be managed only by a competent technical body that readily appreciates all issues affecting aviation safety in the UK.

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