

**Title:**

Dr

**Forename:**

Nicholas

**Surname:**

Ward

**Representing:**

Organisation

**Organisation (if applicable):**

General Lighthouse Authorities

**Email:**

[nick.ward@gla-rnav.org](mailto:nick.ward@gla-rnav.org)

**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

**Comments:**

The General Lighthouse Authorities of the UK & Ireland (GLA) welcome the changes made by Ofcom since the first Consultation Document, in particular the concentration on the VHF Band and also recognition of the many difficulties in applying market

mechanisms to the radar bands.

The acceptance of the constraints imposed by international regulations is noted as a positive step and the acknowledgement of the role of charitable bodies in safety of life services is appreciated.

As ?not for profit? organisations whose primary role is the prevention of accidents, in fulfillment of the UK Government?s obligations under the Safety of Life at Sea (SOLAS) Convention, it is assumed that the reduced fees would also apply to the GLA.

The basis for the pricing structure still seems unclear. Would it be possible to set out the means of arriving at the national reference rate and how it relates to the individual prices per channel? Is there a plan for increasing prices over time and if so, on what basis?

The GLA would strongly support the assumption of a strategic management role by Government for the radar spectrum.

**Question 1: Do you consider that the fee rates set out in Table 8 for assignments in the eight core international maritime simplex channels are appropriate?:**

No. Clarification is needed about the relevance of the high, medium and low density classifications. Does this mean that neighbouring ports will be competing for these channels, or will they be competing with other potential users? Does the field of competition affect the assumptions on which the prices are based?

**Question 2: Do our revised proposals reflect appropriately the distinctions between the different uses of particular internationally allocated maritime channels, as set out in Table 9:**

Yes. The proposals ensure navigation and safety applications are, where appropriate, free of charge

**Question 3: Do you agree with our proposals not to set any fees for use of the calling and distress channels, the search and rescue channels, the AIS channels, or for exceptional shore-based use of the intership channels?:**

Yes

**Question 4: Do you agree with our proposals to set administrative cost-based fees for licences to use the package of 3 marina channels?:**

The GLA have no position on this matter

**Question 5: Do you agree with our proposal to set administrative cost-based fees for licences to use the internationally-allocated duplex channels?:**

Yes

**Question 6: Do you consider that the fee rates set out in Tables 10 and 11 for assignments in the UK-allocated working channels (that is, not including the search and rescue or marina channels) are appropriate?:**

No. The use of population density rather than maritime activity and antenna height above ground level, rather than sea level is likely to produce serious anomalies, which could render the charging system unworkable in practice. For example, maritime activity in the Dover Straits is high, but population density is low; high sites are deliberately used to achieve coverage of sea areas, where interference with other services is not a problem

**Question 7: Do our revised proposals correctly identify all of the UK allocated maritime channels which are assigned to specific applications which require a specific approach to fee setting, as set out in table 12:**

Yes. However, it is not clear whether account has been taken of allocations in neighbouring countries, which currently has a serious effect on the usability of some channels.

**Question 8: Do you agree with our proposal to set no fees to licensees for use of the two UK-allocated search and rescue channels?:**

Yes, since search and rescue is a UK Government obligation, substantially undertaken by charitable or not-for-profit organisations, it would be unreasonable to charge for the use of these channels.

**Question 9: If you are a maritime organisation with the safety of human life in an emergency as your sole or main objective, would you be interested in accessing spectrum for working purposes (ie other than SAR or other emergency response uses) under a private commons basis, shared with other users with the same objectives and co-ordinated by the MCA, and free of any spectrum fee?:**

Yes. The primary role of the GLA is the prevention of accidents, in fulfillment of the UK Government's obligations under the Safety of Life at Sea (SOLAS) Convention, it is assumed that this 'no fees' approach would also apply to them.

**Question 10: Do you consider that our proposed fee rates for area-defined licences(where feasible) in the eight core internationally-allocated maritime simplex channels are appropriate?:**

A clearer explanation is needed of the means of arriving at them, including the basis for the national reference rate and how it translates into individual channel fees.

**Question 11: Do you agree that area-defined licences in the international duplex channels should be based on a minimum cost of £75 for 4 squares, with larger areas priced on a case by case basis? :**

No. This method of defining areas is appropriate to inland use, but not maritime, particularly offshore, where usage is related to geography and topography. Propagation is mainly over sea-paths, with quite different characteristics to the inland situation and is more likely to be subject to weather anomalies.

**Question 12: Do you consider that our proposed fee rates for area-defined licences in the UK allocated working channels (that is, not including the search and rescue channels or the marina channel) are appropriate?:**

As in the answers to Questions 10 & 11, clarification is needed on the means of arriving at them.

**Question 13: Do you agree with our proposal to set an administrative fee of £75 for maritime radio (suppliers and demonstration) licences?:**

Yes

**Question 14: Do you agree with our proposal to bring the arrangements for temporary maritime licences into line with those in other sectors?:**

Yes, the proposals are fair and reasonable.

**Question 15: Do our proposals for phasing in some of the proposed fee increases provide sufficient time for you to accommodate the additional costs, without undue disruption to your operations which could reasonably be avoided by a phasing arrangement? We would like to be able to publish all responses to this question. However, if you wish your response to this question to remain confidential, please provide your response on a separate sheet clearly marked to that effect. Your request for confidentiality will be respected:**

Any additional costs would be a charge on the General Lighthouse Fund and would be borne by the users. This would be difficult to justify in the current climate.

**Question 16: Do you consider that our phasing proposals for the maritime licences for which we propose to set AIP-based fees 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.:**

No comment

**Question 17: 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 7? We would like to publish all responses, but will respect the confidentiality of any material which is clearly marked as such.:**

Nothing further

**Question 18: If the Government were to assume the strategic management role for the radar and aeronautical navigation aids spectrum that we propose, do you agree that we should not develop proposals for AIP licence fees?:**

Yes. The GLA would strongly support this approach for radar.