

Question 1: How should Ofcom manage the process of taking advice from users, regulators and government on efficient apportionment of AIP fees in the maritime and aeronautical sectors? Are any new institutional arrangements needed?:

Ofcom should accept that use of the spectrum previously agreed by International agreement cannot be altered by them and stop wasting tax payers money consulting on how to breach International agreements.

Question 2: If you consider that our proposals for pricing ground station users for any spectrum would be likely to have a detrimental impact on safety, please let us know. In order for us to understand your assessment fully, it would be helpful if you could outline the mechanisms whereby this might happen.?:

The proposals breach international agreements iro the aviation sector.

Furthermore Ofcom fail to realise why aeronautical frequencies are used. They are primarily there for the safety of people on the ground, i.e. the UK taxpayer, and it is the UK taxpayer who is currently meeting the cost.

Question 3: Do you have any evidence which indicates that AIP charged to ground stations could have a material detrimental impact on UK competitiveness?:

Any attempt to increase the cost of an aeronautical radio licence at airfields not receiving passenger services will result in those airfield closing their aeronautical station making the use of the airfield less attractive to foreign business aircraft wishing to avoid large airfields where long delays occur and endangering lives on the ground..

What ofcom are suggesting breached international agreements and has no logical reasoning behind it.

Question 4: Taking into account the information available in this document, including that set out in Annex 5, our initial views on VHF radiocommunications licence fees and on the reference rates for bands in other uses, and any information you have about the organisations to whom we are proposing to charge fees, please provide any evidence that you think is relevant to us in considering the financial impact of the fees we intend to propose for VHF radiocommunications, or for other uses:

You can't do it - therefore there is no point in commenting.

Question 5: Do you agree that there is little to be gained, in terms of economic efficiency, from charging AIP to WT Act licences for aircraft:

If you try to increase the existing fee we shall fly non radio, as we are legally permitted to do.

Question 6: Do you consider that we should discount fees for any particular user or type of user? Specifically, do you consider that there should be a discount for charities whose object is the safety of human life in an emergency:

As you can't charge the question has no merit.

Question 7: Do you agree that Ofcom should apply AIP to ground stations? use of maritime and aeronautical VHF radiocommunications channels, to help manage growing congestion in current use and to ensure that the cost of denying access to this spectrum by potential alternative applications is faced by current users?:

As what you propose cannot legally be achieved, and there is no congestion on the aeronautical spectrum, the question has no merit.

Question 8: Do you agree with our initial view that it would be appropriate to apply a pricing system similar to that already existing for Business Radio licences to maritime and aeronautical VHF communications? If not, what are your reasons for proposing that we should develop a fee structure for maritime and aeronautical VHF channels which is distinct from that already established for Business Radio?:

As what you propose cannot legally be achieved, the question has no merit.

Question 9: Are there any short term reasons specific to the sector(s) why it would be inappropriate to apply fees from April 2009?:

The short and long term reason are that what you propose breach international agreements.

Question 10: Ofcom would welcome stakeholders? views on the factors which should be taken into account when apportioning fees between individual users of radars and racons:

Ofcom should consider whether there is any financial benefit to the UK economy in continuing to employ staff who incur unnecessary expenses try to introduce something which breaches international agreements.

The biggest benefit to the UK Taxpayer would be for the individuals concerned to be identified, sued for gross incompetence so that the full amount of money wasted is recovered and then dismissed without either a golden handshake or pension credits.

Question 11: Do you agree with our initial view that a reference rate of £126k per 1 MHz of national spectrum for L band and S band radar spectrum would achieve an appropriate balance between providing incentives to ensure efficient use of spectrum while guarding against the risks of regulatory failure in setting the reference rate too high? If you consider a different rate would be more appropriate, please provide any evidence that you think we should take into account.:

No.

Question 12: Do you agree with our initial view that a reference rate of £25k per single MHz of national spectrum would be appropriate for deriving fees for licences to use X band radar?:

No.

Question 13: Do you agree that, generally, spectrum used by aeronautical radionavigation aids is currently uncongested? Do you believe that this may change during the next few years and, if so, approximately when?:

No, with increased investment in GPS and other satellite using technology the use of ground based stations will reduce.

Without international agreement they will never disappear however.

Question 14: Do you agree with the basis on which Ofcom has arrived at its initial view on reference rates for aeronautical radionavigation aids?:

The consultation was introduced by a team with zero understand about what international agreements exist and solely in an attempt to do something to avoid being considered unemployable.

Comments:

In introducing this consultation Ofcom have wasted many man hours of the public's time.