

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?:

Make the consultations more public... I am not sure the best way to do this but I only found out about this one through a friend.

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.?:

Yes. I think this could cripple organisations such as mountain rescue teams that rely totally on volunteers and charitable contributions to survive. Organisations like this should not have their future placed in jeopardy for any reason, particularly financial ones.

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

not sure

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:

Any life saving or rescue organisations should not have to pay fees to use a service like this. Without knowing the intricate details, these organisations struggle to survive as it is. They are in a bad enough position not to have any substantial financial support apart from from volunteers and donations. I believe this would put some organisations such as mountain rescue teams in dire financial problems, potentially leading to some of them closing. There is no other service that offers the services they do.

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:

not sure

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:

Yes. Charitable or other organisations that provide life saving or rescue services should not have to pay fees for facilities such as this. I do not believe a discount is good enough as they need every opportunity to survive as their services are not available elsewhere. I am sure there are non-charitable organisations that are in a similar situation ? if so the same should apply, but perhaps to a lesser extent (e.g. if they are a profit making organisation). Where to draw the line in costs would be difficult but for organisations such as mountain rescue there should be no debate ? no fees. It will cripple them.

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?:

not sure

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?:

Very generally businesses use communications like this to increase profits. Where feasible, they should be charged appropriately but not extortionately for this use. I do not believe fees should be charged for leisure and recreation use unless it is on a very small scale. Open access to pastimes such as marine and aeronautical should be encouraged for everyone. Fees for facilities like this will increase the barrier to entry for casual users, therefore limiting access to pastimes and hobbies involving this to people with money. I am not familiar with the current fee structures so this is a general comment.

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

Yes. If fees like this are charged to charitable organisations such as the mountain rescue teams and other organisations this does not give them nearly enough time to consider their impacts, and attempt to plan for increased financial commitments. Every year, their budgets are stretched to the limits, and this would only give them a matter of a few months before they started to incur potentially substantial additional costs.

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:

not sure

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.:

not sure

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?:

not sure

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?:

not sure

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

not sure

Comments: