

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?:

It is important that Search and Rescue assets, and the Statutory Emergency Services are given priority. The use of the radio spectrum by these organisations is critical to the safety of life, both of the casualties they are assisting, and the lives of the people using the spectrum.

The fact that many SAR assets are charities with limited funding, run by volunteers means it is important to keep costs to a minimum - by providing access to the radio spectrum free of charge.

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.?:

If Mountain Rescue teams or other SAR assets were forced to share channels, this could have a detrimental impact on the safety of life of the persons they are working to help. Congested radio channels and cross-communication MUST be avoided to allow incident management to be performed efficiently and effectively. This is of particular importance in major emergencies that involve a multi-agency response.

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

There are plenty of other areas of the spectrum that are not being used.

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:

Mountain Rescue Team, the RNLI, and other Search and Rescue assets are ALL charitable bodies. The people that are involved are volunteers. Those groups ALL rely on public donations. There is no government funding (with the exception of Mountain Rescue teams in Scotland). The whole reason for these organisations existing is to save lives. These organisations work incredibly hard to maximise the use of the donations that they get, and ensure that the maximum is used for that primary purpose of saving lives. At the moment, the bill for the use of the radio spectrum is covered by the MCGA. If the cost of radio spectrum use was passed on to Mountain Rescue

teams and other SAR assets then obviously there will be less funds available for other necessary equipment and training.

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:

Yes.

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 absolutely. Charities whose objective is the safety of human life in an emergency should receive a 100% discount. There should be no charge for the use of the radio spectrum for Search and Rescue purposes.

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?:

The use of SAR channels has been carefully managed to ensure maximum efficiency in the use of the radio spectrum. So, as long as the use of the channels is NOT for lifesaving purposes, I agree.

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?:

ONLY if the radio spectrum is being used for commercial benefit. For the purposes of saving lives, there should be no fee for use of the spectrum.

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

There should be no fee payable for use of the radio spectrum for Search and Rescue purposes - volunteers are using the channels to save lives. This is a short and long term reason, and makes it wholly inappropriate to apply fees over any time frame.

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:

If the beacons concerned are PLBs or EPIRBs there should be no charge to any Search and Rescue assets for use of them.

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.:

Fine, as long as you're only talking about spectrum used for commercial gain. For SAR purposes, the use of the spectrum should be 100% discounted and free of charge.

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?:

If it's being used for the purposes of saving lives then it should be 100% discounted and free of charge.

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?:

I don't know.

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

I don't have a view on this.

Comments:

The use of the radio spectrum by volunteer Search and Rescue charities must remain free of charge. The safety of human life is paramount, and a charging structure that diverts limited and valuable public donations away from that purpose is immoral and unethical. The use of the radios is vital for effective management of life-threatening situations, it is vital for the safety and well being of volunteer team members. It minimises risks to both the casualties and the volunteer rescuers. Increasing costs for use of the radio spectrum for the purposes of saving lives WILL put lives at risk.