

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?:

The plan to introduce AIP fees will have severe unintended consequences as the whole basis is unsound as far as the many and intensive current users are concerned. Precise scenarios should be presented in many current real areas of spectrum use, explaining why the the introduction of fees will improve spectrum use in society as a whole.

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 plan to treat ground stations and mobile stations (marien and aviation) differently is bizzare. It is another element clearly installed in the OFCOM grand plan to allow political madness to be installed by a drip drip process.

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

UK plc is not a pure business or government structure. UK plc will be best positioned globally when its whole population know they are being treated like adults, with privilages and responsibilities. Responsible organisations that add services to the benefit of society, or use less spectrum to provide the same use/service should be rewarded, not charged fees!! Drive many sports and recreations to remain accessible the privillaged few and society as a whole will be poorer, and OFCOM will £1m in the bank. Madness!

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:

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:

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:

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?:

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?:

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

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:

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.:

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?:

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?:

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

Comments:

These 14 questions assume some major technical understanding of a concept so counter-intuitive as to clearly prevent sensible comment from the majority of the current spectrum users. To licence spectrum to new users as a revenue raising exercise must be used with extreme caution. I would be interested to see where reasonable fees gained on the one hand are used to fund technology to improve spectrum service elsewhere, making better use of spectrum and thus allowing ever more use of a finite resource. Station licence fees should be enough, my radio has 100's of channels, but I only use one channel rarely. Long established users have a right to continued service. New users can fund technology to allow new use and old use to work side by side, but totally disproportionate to ask established users to join a open ended revenue raising scheme that clearly is not interested to develop technology or services. Not a good idea. Which current spectrum users claim it is a good idea? Commercial users? Able to walk all over everyone else? not good for image of UK plc, this is not Korea or Iran.