

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 primary task is look at the safety impact of any charging. Is it there for safety or revenue. What effect will a charge have on users, and will they just not use the facilities because of cost.

Radio communication in the areas you want to sell off is a safety issue, I am sure a health and safety investigation will indicate the grave possibilities.

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.?:

Recreational aviation in all its forms flying under Visual Flying Rules is conducted on a see and avoid principal. To that end particularly in areas of high aircraft density such as when approaching an airfield, it is imperative that aircraft can communicate on a known frequency to get the latest information from the airfield and give their position reports, this allows other pilots on the frequency to form a mental picture of the whereabouts of other aircraft and so safely join the circuit to land.

Most small airfields and flying clubs will not be able to afford these fees so will revert to operating non radio THIS WILL COST LIVES! as situational awareness will vanish.

It is immoral to try to create a tax knowing that those areas that cannot afford it will pay with lost lives. People will trade down safety to continue with their hobbies.

I am sure my comments will equally apply to the boating fraternity.

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

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:

See 1 and 2

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

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?:

Most definitely NO. There is plenty of availability if the frequencies are managed better.

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?:

See the answer to questions 1 and 2

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

See 1 and 2

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.:

Your concept of charging to create efficiency is in my view erroneous, you also seem to want to set a price as if you were selling tomato's and appear not to understand radio frequency useage and band width at all, so I dissagree with your initial view.

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?:

Your concept of charging to create efficiency is in my view erroneous, you also seem to want to set a price as if you were selling tomato's and appear not to understand radio frequency useage and band width at all, so I dissagree with your initial view.

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?:

There is plenty of availability currently and time to get the frequencies allocated to other contries but not used put back into international circulation, if this is not possible there is also sufficient time to develope radio's capable of halving the bandwidth and so doubling the availability, should this be required in the distant future.

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 at all.

Comments:

Unfortunately this is going to be seen in the future as the tax that cost lives if applied to light aviation certainly, and posibly also to boating.