

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?:

Charitable organisations such as Mountain Rescue Teams who depend on donations from the public must be given maximum weighting as to the views on this process.

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.?:

Charging for the use of MR radios whether from base stations, hand helds or repeaters would seriously affect the ability of all mountain rescue teams to remain financially solvent and will adversely affect the service provided to those in need on the Mountains of Scotland and indeed Britain.

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

I do not see how not charging for the use of such a small spectrum of the VHF network could harm UK competitiveness especially when it is used for safety purposes by an organisation who provide a free service for anyone in need on the mountains or hills of Britain.

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 in Scotland and in deed in Britain is provided by volunteers who give up their time freely and any charge levied for the use of its radios would result in money raised or donated by the public being taken away from safety equipment for personal use by team members while involved in mountain related incidents and especially in winter or in the type of equipment used in exacuating the injured person from the mountains.

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:

N/A

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. I believe there must be 100% discount for those organisations involved in the safety of human life and especially where those organisations depend on donations from the public to meet their running costs and where their members do not receive any financial remuneration for providing such a service.

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?:

If AIP must be applied, then it should not be applied to those organisations involved in the safety of human life.

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?:

I cannot comment on whether there is a need for charging for the use of VHF radio communications, other than it should not be applied to organisations involved in search and rescue incidents whether on land or water and especially for those charitable organisations.

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

Whether short or long term I do not see the need to charge for the use of VHF radio when involved in MR training or actual incidents.

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:

So long as it is not applied to MR I do not have a view on this.

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.:

Any charge would be too high when available finance is extremely tight in connection with MR

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?:

I am against any charging for use of VHF radio comms by mountain rescue teams involved in search and rescue

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 do not have an opinion on this matter

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

Again i do not have an opinion on this

Comments:

Any charge made against any organisation and especially charitable voluntary organisations involved in mountain rescue will have a detrimental effect on the ability of those teams to provide a rescue service that essentially remains free to those in need.

The use of all the channels currently available to mountain rescue teams should be excluded from this consultation and remain free to those organisations who can demonstrate an essential requirement for them in the preservation of life.