

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?:

Ofcom, like any body that does not have expertise in a field or application of its area of expertise should note the objections and arguments for this proposed scheme. The interested parties, AOPA, CAA, RAF(Search & Rescue etc) amongst others should be heavily consulted to gain an understanding of the implications to both safety and the aviation industry.

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, if we lose radio services at smaller airfields, safety will decrease, I have many hours as pilot flying in the UK as well as a Flight Test Engineer on the ground during testing of aircraft in flight, talking on radio covering over 15 years; I therefore consider myself competent in stating that from my experience there will be a severe decrease in safety as the cost and expense of maintaining a radio will be too much for some. In addition people will not be able to fly as much if at all due to increased costs that will be passed on to the user. Therefore their currency will be less and more prone to errors and hence a decrease in safety.

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

Personal experience as well as that of the aviation experts should be enough. For example if you take your car to the garage you rely on the technicians there to tell you what's wrong and what's needed because they have the expertise rather than yourself that may have only read a few car magazines

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:

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:

There should be no charges at all. But I fail to see how anyone could think of charging charities in a situation like this.

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?:

Regulation should be carried out if required, the motives behind charging and those who support it should be questioned. In any case an informed body in aviation terms is required not just one informed on radio/ communications.

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?:

NO, models from other countries should be consulted

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

The industry would not be able to cope/ support a short term implementation.

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:

Expert knowledge and experience

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.:

No

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?:

No

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?:

No, may increase in a few years, charging will not be the answer in any case

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

No

Comments: