

**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?:**

You are doing fine

**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, How can you even think of charging a volunteer based charity fees for use of the spectrum, mainly when they monitor the emergency channels that you are planning on not charging for. Which is good since there are multiple international agreements setting aside those frequencies.

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

No, just the loss of lifesaving, which the government would have to make up since they are bound by international law to provide SAR within the EEZ.

**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, and the same applies to maritime ships passing, therefore the only people you are charging are those responsible for the safe and orderly conduct of shipping and air control. That you are proposing that the government charge itself, with the exception of the RNLI.

**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 you should charge around zero percent and give a discount from there.

**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?:**

NO!. You won't control it, it will only go around.

**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. There are no good reasons for setting up a fee schedule for maritime and aeronautical usage, other than another stealth tax. Those freqs were set aside world wide for usage by aircraft and shipping. They were not auctioned off to a commercial company to exploit.

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

Shouldn't apply the fees at all.

**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:**

I suspect that if we put Ofcom in an aircraft, with an internal navigation problem, they might not be so happy to charge fees. Just curious how are you going to handle military radars and military users? Charge them as well?????

**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?:**

No. Most of the radars are on top of each other and by managing the other parameters that the radars are kept separate.

**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:**

If the government was going to auction off parts of the spectrum for commercial usage then it would be appropriate to charge fees to the company performing the usage. To suddenly charge for frequency usage in maritime and air is criminally negligent. As consultants you should climb out of your ivory tower and spend a little time in the real world.