

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?:

Emergency service providers should have priority, and those such as MR teams which are charitable and not for profit should have precedence over those from the commercial sector.

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 volunteer/charitable MR services would be detrimental to safety. Money desperately needed for equipment would have to be diverted to paying for a radio licence. Reducing the number of channels will also affect our operational safety. I have personally been lowered of a cliff as a jockey, vital communications between myself and the control crew were interrupted at a critical time, by another team using the radio. Resulting in me being lowered past the casualty, and having to be raised back up. Potentially life threatening for me and the casualty. Reduction in the number of channels MR can use will only make this situation worse.

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

My understanding is that there are underused channels with the UK available spectrum.

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:

MR has to raise all of its funding from voluntary donations. We struggle to get enough equipment as it is. If we have to pay for a radio licence every year this will only make the situation worse. We are at present raising money for a small portable defibrillator which we can carry onto the mountain, having to pay for a radio licence (every year) would put this in jeopardy, putting lives at risk.

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:

I do

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 a full 100% discount for all voluntary MR teams for all existing channels.

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?:

Yes as long as it doesn't effect existing MR channels

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?:

Yes but only for those channels which are used by commercial business/gain. Not for MR, RNLI etc

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

As above

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:

Not really applicable to MR unless the new life saving beacons become liscenced. If that happens then MR should not be charged for usisng them.

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.:

Only for commercial business. Not MR etc

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?:

Again not for MR

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?:

Can't comment on this

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 can't really comment on this

Comments:

Charging MR and other voluntary rescue organisations will reduce our efficiency and put casualties lives at risk.