

**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 should ensure you take the views of any charity organisations into account, and in particular the RNLI

**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.?:**

I think it will have a considerable detriment on the safety of many people because a) a lifeboat station may not be able to afford to pay the fees and may have to close or b) the money that has to be paid could have been used to purchase other items of equipment which could have a safety impact on either the ability of a lifeboat to rescue people or put the life of the people who operate the boat in danger because I suspect they will still go out to sea with whatever they have, even if they are missing something that would make the job safer.

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

Competitiveness? Are you having a laugh? I think where the RNLI and other charity organisations are concerned the word competitiveness is both insulting and irrelevant. This alone shows that you should enforce this AIP to commercial organisations only.

**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:**

I think it is fairly obvious that if you take money from a charity organisation then they either have to collect more money, or spend less in other areas. If the public knew that £260,000 a year of the money they donate to the RNLI for instance was being spent on this then people may in fact be less inclined to donate (I for one don't donate to any charities that spend money advertising on television for example).

**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, because how would you police it? Chase them?

**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. In a word. And for the avoidance of doubt, the discount should be 100%, or perhaps a little more. You could in fact spend some of the money collected in donations to such charities. Just think how good the PR would be for the people collecting the money from elsewhere.

**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?:**

I do not feel well informed enough to have a considered opinion on this question.

**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 do not feel well informed enough to have a considered opinion on this question.

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

I do not feel well informed enough to have a considered opinion on this question.

**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 do not feel well informed enough to have a considered opinion on this question.

**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.:**

I do not feel well informed enough to have a considered opinion on this question.

**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 do not feel well informed enough to have a considered opinion on this question.

**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 feel well informed enough to have a considered opinion on this question.

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

I do not feel well informed enough to have a considered opinion on this question.

### **Comments:**

Please don't take money away from people when it must be very difficult to collect. If you think about how many tins it would take to shake, to collect £260,000, then I think you will dishearten those who shake them to such a degree that you could single-handedly destroy an organisation that has been saving lives for a long time. I don't know enough about the RNLI to know, but saw them in action once on school trip when one of our girls go into trouble and ever since have felt much safer in the water knowing they exist.