

Question 1: Do you agree with Ofcom's proposed overall approach to improving the management of public sector spectrum holdings and, in particular, with Ofcom's conclusion that it will generally be preferable for public sector bodies to interact directly with the market?:

Only insofar as it recognises the safety threat it poses

Question 2: What factors do you consider Ofcom should take into account in determining the programme of reform in the framework for managing public sector spectrum holdings?:

Use of frequencies that are an integral part of maritime safety should remain free to the end user

Question 3: Do you consider that the proposals should be phased in?:

No view

Question 4: Do you agree with Ofcom's proposals about the frequency bands that offer the greatest potential benefits from band sharing? Are there other frequency bands where the facility to trade or lease spectrum from public sector bodies would be particularly attractive?:

No view

Question 5: Do you agree with Ofcom's proposed approach to awarding public sector licences and RSA?:

With the safety caveat

Question 6: Should public sector spectrum trading be introduced at this stage in the Channel Islands and Isle of Man?:

no view

Question 7: Should there be additional grounds, eg safety-related, for Ofcom to refuse consent to a proposed trade in certain frequency bands or for certain applications?:

Yes. The Marine VHF channels, are used by the leisure boat community primarily for communications in safety matters. Marine radars are used for safe navigation, especially in adverse conditions such as fog. The use of VHF and radar are major contributors to the current good safety record of leisure boating in the UK. Were this facility to be subject to a different regime, particularly where the user might end up paying, then there is a high likelihood of users electing not have a VHF (or radar), particularly those at the less sophisticated end of the market who are, by definition, more vulnerable.

The implications of this that there will be a decreased ability to summon help, communicate with the Coastguard, and be located by the rescue services.

The view of the National Water Safety Forum is that anything other than a free access to Marine VHF and radar will have a negative impact on safety at sea. It would also be counterproductive to the campaigning that is going on to encourage all small craft users to carry a VHF when they go to sea.

Comments:

The response to this consultation document is made on behalf of the National Water Safety Forum by the Chair of the Sea Advisory Group, a constituent member. This group is primarily concerned with safety issues amongst the large numbers of people who go to sea in all sorts of craft for leisure, and is dismayed at what it perceives as a potential to make our coast less safe. It would regard any change to the current use of Marine VHF and radar frequencies which might, even to the smallest extent, inhibit ownership and use of such equipment to be counterproductive to efforts to get the leisure boater to carry means of calling for help, and to be able to navigate safely.

OfCom is urged to exempt the use of this equipment from any proposal, other than free access.