

1. How does the proposal increase efficiency by applying a charge if organisations cannot trade due to international arrangements that cover the use of the Spectrum ?
2. The additional regulatory burden attached to this proposal seemingly goes against the Governments commitment to keeping regulation simple and less beaucratic. Therefore it could be argued that Spectrum pricing is an additional tax burden, which will further damage an industry which is already struggling.
3. Annex 12 covers the Regulatory Impact Assessment - AOPA questions, how this has been done, as it fails to take full account of the proposed changes or the impact on GA. Nor do we believe the statement in the last bullet point on page 84 about the estimated cost to users being "low relative to the potential benefits";

*The 118 - 137 comms band is valued at around £12 million,
when you use the £610,000 value per MHz.*

If this cost is shared equally between 10,000 aircraft the annual bill to aircraft owners would be between £1000 and £1200. It is unlikely that NATS would add the charge to the enroute charge as the UK already has one of the highest unit rates in Europe. However we do not yet know what kind of charging scheme they have in mind.

4. As a starting point safety is our primary consideration and AOPA is of the opinion that sharing should only be permitted if the body who wants to share the same part of the Spectrum currently used by aviation can demonstrate that there will be no interference. The UK Safety Regulator (CAA) should be the organisation to grant approvals on safety grounds alone without other considerations, once it is satisfied that there will be no risk from sharing.