

The Aircraft Owner's and Pilots Association of the UK represent the views of approximately 18,000 private pilots and aircraft owners.

In responding to the above consultation AOPA is concerned about the scope of the consultation which appears to go beyond just UHF issue.

There are three issues which we have concerns as they apply to aviation; pricing, trading and sharing.

Annex 12 covers the RIA (Regulatory Impact Assessment) and on page 4 it states that in respect of costs to users as being "low relative to the potential benefits". AOPA would like to know specifically how you can arrive at such a position if you have not involved General Aviation in your analysis.

Our understanding is that the DfT would need to become licensed for RSA however they would, by some form of legal arrangement, pass that responsibility on to either the Civil Aviation Authority or the National Air Traffic Services (NATS) for the collection of any charges associated with RSA.

As aeronautical frequencies and spectrum are protected by international rules we believe it would be extremely difficult for DfT or its agents to trade in spectrum. Ultimately any new pricing plan will become just another tax on our industry.

At the same time these proposals introduces additional bureaucracy which goes against the government's commitment to reducing the regulatory burden on industry generally. How do you propose to address this issue?

As for spectrum sharing it gives us cause for concern because there is no safety data provided that explains how interference is dealt with, that is to say what level of interference is acceptable between providers without infringing on the current high safety standards we have in aviation.

Safety is our first priority because we rely on the systems in aircraft cockpits to insure our flight from beginning to end can be made safely. If by sharing the ILS band with another party aircraft operators need to be assured that the information being displayed is free from interference, if not the risks go up. It can be stated inter alia that such equipment provides safety of life data.

If sharing of spectrum is to be permitted the applicant must go through a process which includes the CAA's safety regulator for approval before sharing is permitted.

In summary:

We do not think that DfT or its agents (CAA/NATS) should be approved for RSA. Aviations use of spectrum is complex and should be fenced off as we can not see how it would be possible to trade part of the spectrum and pricing will just mean additional costs to our community.

As for sharing of spectrum it might be possible if technical solutions permit and providing they meet an acceptable standard to the UK CAA's safety regulator at some point in the future. The aviation industry across Europe is engaged in a process known as SESAR (Single European Sky ATM Research) and this group maybe the right arena for discussing spectrum sharing.