

RESPONDING TO THE SPECTRUM FRAMEWORK REVIEW: PUBLIC SECTOR CONSULTATION

Dear Mr Green,

I have learnt of the Spectrum Framework Review through my sector representative body as a private pilot, AOPA. Your proposals appear to impact once again on the hard pressed General Aviation community which not only provides recreation but importantly contributes valuable employment to the economy as a whole as well as providing the airlines with their future flight crew intake. You will be as acutely aware as I am of the impact of specialist fuel prices and increasing legislation on what is currently a very well regulated and safe industry.

In responding to your proposals I would be glad to learn in particular --

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? It thus seems to me that the proposed Spectrum pricing is actually an additional tax burden, which will further damage an industry which is already struggling.
2. The additional regulatory burden attached to this proposal seemingly goes against the Governments commitment to keeping regulation simple and less bureaucratic. How do you reconcile that?
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 of their impact on General Aviation. Nor is the statement understood 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 this 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 is envisaged and will be glad to have that clarified.*

4. As a starting point safety is our primary consideration and AOPA is of the opinion that sharing frequencies 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 possibility of interference. The UK Safety Regulator, the Civil Aviation Authority, must alone be the organisation to grant approvals on safety grounds single-mindedly and without other commercial considerations. We will be glad to have your confirmation of that.

I do hope that you will be able to take the above points into account in developing your proposals and will let me have your response, through AOPA, in due course.

Yours sincerely