

FAO Helen Watson

Trinity House, the General Lighthouse Authority (GLA) for England, Wales and the Channel Islands very recently received a copy of the above from the MCA, which has not unfortunately not given us time to consider your proposal in any depth or to consult with our sister authorities in Scotland or Ireland. These are therefore very much preliminary thoughts ahead of consideration of your full report.

Please could you ensure we are included in any future consultation documents on spectrum use. Our address is Trinity House, Tower Hill, London EC3N 4DH.

As a GLA we are responsible for the provision of marine aids to navigation required for general navigation. This includes radio aids to navigation such as radar beacons (racons) operating in the 'X' band of 9320 MHz to 9500 MHz and 'S' band of 2920 MHz to 3100 MHz and also a differential GPS service for broadcasts in the medium frequency range 283.5-315khz. We are also currently conducting LORAN-C trials in the frequency band 90-110 kHz from a location in Rugby. As Automatic Identification System AIS technology develops, we are hoping to exploit the benefits of AIS to enhance our service to the mariner by applying AIS technology to selected AtoNs. Other needs will no doubt come to the fore as our AtoN strategy develops.

In addition we use public wireless networks for monitoring remote installations required for safety of maritime navigation. Any trading in these services that could affect their reliability would be a matter for concern. That said, identifying ways to improve the efficiency of spectrum management is generally supported.

It is noted that you acknowledge that marine bands are allocated by international agreement and that where there are internationally harmonised channels, the use of which are largely dictated by internationally mandated technology standards and protocols, the opportunity cost of this spectrum is effectively zero, such that there is in effect no case for spectrum pricing. It is further noted that the current implementation plan does not appear to include any of the radio-navigation bands in use by Trinity House.

In this connection you should be aware that the bands used by Trinity House are for safety of life at sea applications and not for profit. Our costs are met from the General Lighthouse Fund (GLF). The income to the GLF comes mostly from light dues, which are charged, on shipping calling at United Kingdom and Republic of Ireland ports in proportion to the costs of the services provided. There is no provision for Exchequer funding for our service. We would therefore not wish to see Spectrum Pricing or AIP introduced in this area.

Regards
Jon Price
Legal and Risk Manager