



New Zealand Fire Service

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Policy and Planning
Radio Spectrum Management
PO Box 2847
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Dear Sir/Madam

Radio Spectrum Fees Review 2015

New Zealand Fire Service (NZFS) appreciates the opportunity to give feedback on the Radio Spectrum Fees Review 2015 (the Review). NZFS holds licences used for radio services in critical public-safety operations and has significant interest in this process.

NZFS note the rationale behind the Review, but have practical concerns with some changes proposed. These are covered in detail in our responses (next pages) to the individual Proposals in the Consultation Document, and are summarised here:

- For many years, NZFS planned and built paging infrastructure based on the availability of single radio licences allowing multiple transmitter locations.

The timeframe proposed for withdrawing multi-location licences makes it impractical for NZFS to optimise its radio infrastructure for such a licensing environment. To proceed as proposed would expose NZFS to a precipitous rise in radio licence fees.
- Making only single location licences available for land mobile repeaters would leave no licence class suited to transportable temporary repeaters. Provision for an All New Zealand licence needs to be retained as it is impractical to licence such repeaters in advance for specific locations for each event where they are used.

I trust that the Ministry can refine its proposed changes to accommodate NZFS and other organisations with similar concerns.

Regards

Sean Crawford
National Telecommunications Engineer

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**Point by point response by NZ Fire Service to Proposals in the
Radio Spectrum Fees Review 2015**

Proposal 1: Set fees based on the level projected to reduce the memorandum account balance to zero in six years, with a subsequent increase in fees to balance revenue and expenditure.

No comment.

Proposal 2: Introduce a single licence fee for all licence classes.

A single fee for all licence classes appears to not account for the variations in spectrum and geography covered by each class of licence.

NZFS suggest that differentiated fee levels are retained to incentivise conservation of spectrum. In particular where more than one type of licence is useable for a given application, make the cost proportional to the power and occupied bandwidth.

Proposal 3: Discontinue licence categories for land mobile multiple repeaters on a common channel throughout New Zealand (LR1 and LR2) and multiple radio transmitters on a common frequency for paging (LP1).

This proposal represents a significant change for NZFS and any other holders of multi-location licences, both in increased on-going licence fees and any one-off engineering/administration costs.

The availability of multi-location licences has influenced NZFS planning of radio infrastructure over many years (particularly in paging). While locations for future in-fill paging can be removed from licences in the short term, it is impractical to re-optimise existing infrastructure in the time between now and July 2016.

As proposed, the timeframe for discontinuing licences with multiple transmitter locations is onerous. NZFS would be left with a significantly increased cost for paging licences (more than trebling NZFS current total costs for all licences held).

Precedents already exist in radio licence planning for more reasonable lead-in times for changes to radio licences that can impose significant costs on radio spectrum users (for instance, withdrawal of licences for 25kHz spaced land mobile channels).

NZFS recommend that multi-location licences be continued for a period of three years to allow practical time to implement alternative configurations of paging equipment that are better suited to the single-location-only licensing regime being proposed.

It may be of interest to note that the impending closure of the public paging service provided by Spark New Zealand has already driven NZFS to actively investigate alternative alerting methods. This provides an opportunity incorporate the proposed licensing changes into an optimum solution. However again it needs to be stressed that this is a multi-year program with lead time required to make the necessary changes.

While the wording of Proposal 3 and its preamble did not specifically refer to All New Zealand licences, an unfavourable interpretation could be drawn. NZFS is among a

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number of users that have All New Zealand licences to cover transportable repeaters set up for temporary operation. NZFS deploy such repeaters at short notice to support emergency events in various locations.

Licences to support such itinerant operation need to be exclusive to the user over all of New Zealand and need to avoid the need to specify particular locations. It would be fair to assume that the onus would be on the licensee to manage co-channel issues in the event of more than one transmitter being deployed on the same channel.

NZFS recommend the All New Zealand version of land mobile repeater licences be retained.

Proposal 4: Remove the discount for online payment and reflect the discount in the calculation of the base licence fee.

No comment.

Proposal 5: Introduce a manual processing fee of \$25 to recover the administration costs of paper-based payments.

No comment.

Proposal 6: Remove the Licence Interference Investigation (LII) rebate.

No comment.

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