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Len Starling
Manager, Radio Spectrum Policy and Planning
Ministry of Business, Innovation and Employment
P O Box 1473
Wellington

<By email>

Dear Len

Spectrum Fees Review

Thank you for the opportunity to comment on the review of the licence fee framework and issues relevant to fee setting under the Radiocommunications Act 1989.

Vodafone supports the six proposed changes to the licence fees and fee structure contained in the review document with one amendment.

In respect of the first recommendation to "*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*", Vodafone recommends that the period to reduce the account balance to zero should be a maximum of three years. While we recognise that a refund to licence-holders for previous collective overpayment is not possible, the accumulated surplus accrued from historic licence fees should be reduced as quickly as possible.

Should you have any questions, please do not hesitate to contact chris.abbott@vodafone.com.

Yours sincerely

Chris Abbott
Head of Public Policy & Government Relations