

This submission is made by:

Kiwi Care Electronics Ltd - Client Number 515730, in respect of Radio Paging licence ID 163350 - Number 238330 - 160.6525MHz

Kiwi Care Electronics (KCE) commenced business in August 2010, principally to install and maintain Nurse Call systems.

As a service to its clients and to ensure that the radio paging systems associated with the new nurse call systems installed by the company were licensed; KCE applied for and secured the above licence. It quickly became evident that many of the paging systems installed by others, which KCE now provides maintenance for, were unlicensed. KCE added these locations to their licence and has or is in the process of changing them to the KCE license frequency.

Our submission is:

1. There is a large number of radio paging systems operating within New Zealand which are now operating unlicensed.
2. When systems are operated under a multiple location licence, Spectrum Management at least has a record of where these licences are located.
3. If, as proposed, multiple location licences are discontinued, KCE who only charges its clients a fee adequate to cover the administrative costs, will let its licence lapse.
4. It is submitted that the administrative and compliance monitoring costs incurred by Spectrum Management, may well exceed the extra revenue obtained.

Kiwi Care Electronics Ltd

John Kirkpatrick

Director