



The Otago Branch of the New Zealand Association of Radio Transmitters Inc.
(Inaugural meeting 9 August 1928)

P.O. Box 5485, Moray Place, Dunedin, 9058.
Clubrooms: 109 Macandrew Road, South Dunedin.
Charities Commission Reg No. CC 40410

3 December 2015

To Whom It May Concern
MBIE RSM
Fees Framework Consultation Group

Dear Sir/Madam

MBIE RSM Licence fee changes.

It was with much dismay that Branch 30 members learned of the RSM proposal to significantly change the licence fee situation from 1 July 2016 to our detriment.

As you are probably aware via submissions from our Repeater Trustee, Martin Balch ZL4JH, our Branch 30 holds and operates nine licences for both fixed and portable repeaters in both the 2 metre and 70 cm bands.

All these units are in frequent use throughout any year providing good communication for regular amateur use, and in support of community activities such as car rallies and, as needed, also supporting CD & SAR operations.

These "Public Good" activities are fully recognised by our local Civil Defence, Search and Rescue, NZ Police, and Regional Authorities, and are reported on annually in our mandatory reports to the Charities Commission.

Our Otago/Southland terrain being very hilly poses many challenges in providing good VHF/UHF coverage and requires the present number of repeaters to ensure reliable service to both our members and the community groups whom we serve, particularly in emergency conditions. These repeater systems have been built up over many years and at significant cost to our local Otago and Southland members.

No doubt many other NZART Branches would claim the same for their area of operations.

Otago Branch currently pays \$46 per licence (at the reduced on-line payment rate) for a total cost to the Branch of \$414. This is about 25% of our annual income from member subscriptions. The RSM proposal raises this cost to \$1530 which is a cost our branch cannot bear.

Reading the proposals it appears all categories of licence whether commercial or non-commercial will see the benefit of significant fee reductions.

The exception would appear to be our Amateur Service where the costs will increase by a factor of 3 plus which no group such as ours can afford to pay.

Fairness alone should not see our fees increase to such an extent while other commercial profit-driven operators benefit from significant fee reductions.

Maybe there is a case for a "two-tier fee structure" where non-commercial, non-profit organisations are charged a flat fee which is a significantly less amount than the commercial operators who make profits.

The RSM "One size fits all!" approach, while simple for you, is highly discriminatory.

Our Branch 30 options are few!

If these cost increases proceed as planned we may well be faced with the need to reduce the number of repeaters we operate to the detriment of our members and the communities to whom we provide volunteer services.

Four years ago when faced with the then proposed huge costs to access Kordia sites, where nationally we have many repeaters sited, we only succeeded by appealing to the Minister at the eleventh hour. Maybe we are heading into a similar situation.

Branch 30 Committee has not met to discuss this issue but, with time of the essence, I have taken it on myself to provide you with what I believe are the common views of our Branch 30 members

Yours Sincerely Dave Howell Secretary Otago Branch NZART

