



WISPA New Zealand

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**Radio Spectrum Management Group
Ministry of Business, Innovation and Employment
15 Stout Street
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WISPA NZ submission on the 2017 5 year spectrum review.

To whom it may concern,

WISPA NZ is pleased to submit on the 2017 5 year spectrum review.

WISPA NZ is the newly formed representative body of the New Zealand Wireless Internet Service Providers (WISPs).

Over the last 2 decades WISPs have been established all over New Zealand providing over 40,000 primarily regional, rural and remote New Zealanders with cost effective, reliable broadband internet access.

As wireless operators, our members entire business model is based on access to effective, low cost spectrum that can support increasingly competitive internet access technologies that have remained competitive (and in some cases superior to) 3G & 4G fixed wireless internet access technologies.

WISPA NZ members are also increasingly using licenced spectrum for DMR backhaul and are also investigating the use of LTE as a customer access technology.

WISPA NZ is a strong supporter of driving innovation through the opening up of spectrum to small operators and the general public

WISPA NZ support the following

- The expansion of the GURL spectrum to include 5.875-5.925MHz for the next round of RBI
- The lower end of the GURL 5GHz spectrum, increasing in EIRP to support point to multi point links for approved providers
- GURL not being allocated to LTE-U on the ground that this spectrum is already becoming cluttered and a wild west by individuals and operators that do not play by the rules
- Continued research into opening additional spectrum in the 4900- 5000, 5150 -5250,5350 -5470 & 5875 – 5925 MHz from their existing uses to a cost neutral system like the Ofcom UK band C light licensing scheme
- The allocation of 2.6-2.7Ghz as managed licence park for regional providers
- The opening of further channels in 600MHz as licenced links
- The opening of further channels in 700MHz as licenced links
- The opening of 3.5GHz for use to all carriers and users as managed spectrum park for point to point and multi point applications

General Principles:

WISPA NZ supports the following general principle's with regard to national spectrum policy:

1. Continued development of the 'public park' approach to spectrum as it is the major 'last mile' technology
2. Regional spectrum, WISPA NZ strongly supports setting aside regional spectrum blocks in all spectrum allocations as we believe the current national allocation model has disadvantaged regional operators and has hindered regional economic development and innovation.
3. Strong enforcement of 'use it or lose it' provisions in current licences where nationally held spectrum is not being used regionally.
4. That future spectrum allocation models factor in rural and regional impacts
5. That future spectrum auctions move beyond the current deepest pockets model to a 'pay as you use model' that regional operators can afford.

WISPA NZ supports a 'light handed' regulatory approach to spectrum use with the objective of reducing interference and more effective bandwidth/MHz use of spectrum

WISPA NZ is available to discuss any of these points in more detail.

Sincere Regards

Chris O'Connell

WISPA NZ

