



13th September 2018

**Radio Spectrum Management Policy and Planning
Ministry of Business, Innovation and Employment**

By email: Radio.Spectrum@mbie.govt.nz

**Adding new usages to General User Radio Licence for Short Range Devices
below 30 MHz**

Apple welcomes the opportunity to provide comments on the RSM's technical consultation on Adding new usages to General User Radio License for Short Range Devices below 30MHz.

As noted in the consultation paper the inductive loop system and wireless power transfer is subject to significant growth, which is likely to increase exponentially. It is crucial that New Zealand's spectrum allocation and applicable standards for inductive loop system and wireless power transfer are harmonized with international standards so that the projected growth can be fully sustained and does not impede the functionality of emerging innovative technology .

Apple supports GURL SRD proposed by RSM within the consultation document of harmonization with international standards.

Apple would welcome the opportunity to address any queries of RSM associated with this submission. Please do not hesitate to contact Yan Gao (ygao@apple.com).

Apple Inc.