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Sent: Sunday, 20 June 2021 13:13
To: Crown Spectrum <CrownSpectrum@mbie.govt.nz>
Subject: MSP review

Good afternoon

Thank you for the opportunity to comment on this consultation.

My responses are as follows:

1. To an extent, however it would seem that some parties are not acting in the spirit of the MSP intent.
2. Competitive tender with attributes for population coverage or certain service levels provided (for instance, broadband services provided above a specified minimum speed). Otherwise, auction.
3. Limiting the usage of the spectrum in a broad sense would make some sense, however we must be sure that in doing so we are not limiting innovation in the space by being so prescriptive. For instance, should new 5G bands become available within MSP bands then these should become available without inhibition by the rules.
4. Competitive tender, for the same reasons above, but also to ensure the best use of the spectrum for the benefit of all New Zealanders.
5. No, this would be anti-competitive in my view. If using a competitive tender there is potentially provision to add “points” to the application for existing providers or those who have other experience providing similar services already as this provides some credibility that the spectrum will be utilised as expected.
6. To an extent, yes. Many of these providers exist because they are under-served by traditional telcos. To not allow them to continue, or to otherwise extend, risks placing these communities back to that same position as before.
7. & 8. To an extent, yes. There is some risk of consolidation. My thoughts on this would be limiting the amount of spectrum available to any one party in a specified geographical area to prevent monopolising the available spectrum.

Kind regards
Cody Cooper