



WISPA.NZ



Wireless Internet Service Providers Association NZ Incorporated

Managed Spectrum Park Review and Regional/Non-
National Allocation

Discussion paper June 2021

Peter Mancer, Chair, WISPA.NZ Spectrum Sub-Committee

Contact: ernie.newman@wispa.nz



CONTENTS

1	Executive Summary.....	3
2	Introduction.....	4
3	Response to Questions Specific to Options presented.	5



WISPA.NZ



1 EXECUTIVE SUMMARY

WISPA.NZ, representing wireless Internet service providers all over New Zealand, appreciates the opportunity to submit a response to the *Discussion document, Managed Spectrum Park Review and Regional/NonNational Allocation*.

Wireless Internet service providers provide internet and phone services mainly to rural New Zealand. We have made significant investment and make extensive use of the 2.6GHz Managed Spectrum Park band mainly for fixed wireless access. It is extremely important to us so we are very keen to ensure that the future management of this band does not affect our ability to continue doing this and allow us to expand as customer usage grows.

We welcome the review of this process as a number of our members have had more than their share of difficulties with this.

Our response is based on the combined knowledge and experience of 28 WISPS throughout New Zealand who have been providing wireless services for up to 20 years. We have a well-deserved reputation of innovation and thinking 'outside the square' to provide unique and effective solutions for our customers.



2 INTRODUCTION

2.1 INTRODUCTION TO WISPA.NZ

WISPs – or wireless Internet service providers – are the key to broadband in rural New Zealand.

They provide Internet connectivity by fixed wireless, mostly in regional or rural areas where mainstream telecommunications companies don't bother going. WISPs connect to a fibre optic link at a central point (this is known as "backhaul"), install a series of fixed wireless receivers and transmitters on hilltops or high buildings, and bounce the wireless signal across a series of these sites to a cluster of end users in a rural area.

Here in New Zealand there are about 30 WISPs. Most of them operate in a single region. Nearly all are privately owned businesses run by an owner operator who is active in the business day by day. This makes them very accessible and responsive in terms of their customer service. There are no interminable waits for a call centre to answer in Asia; your local WISP is just down the road. The services, speeds and prices WISPs offer are highly competitive with urban suppliers.

Often the service quality is indistinguishable from the fibre-to-the-premises offered in big cities. And WISPs are as good as anyone for reliability – for example, during the Kaikoura earthquake in 2016 the local WISP, Amurinet, stayed on line uninterrupted, keeping the community connected during the recovery phase while every other fixed and mobile service provider went off line.

WISPA-NZ – or more fully the Wireless Internet Service Providers Association of New Zealand Inc – was established in January 2017. Our purpose is to be a unifying point for the WISPs, liaise with central and local government, provide a collective voice for members, negotiate collectively (eg for joint purchase or leasing of wireless spectrum) and do whatever else the members collectively decide.

For example, we have made representations to Radio Spectrum Management about future spectrum policy, submitted to the Commerce Commission's review of backhaul pricing, and entered negotiations with several parties about commercial arrangements that will advantage members' businesses and customers.

Issues continue to arise. Examples include collective liaison with various Retail Service Providers, the impact of the new legislation enabling lines companies to run fibre across existing power corridors, and the business model of the future for WISP businesses.

WISPA-NZ has 28 member companies. Details of these can be found on our Members page.



3 RESPONSE TO QUESTIONS SPECIFIC TO OPTIONS PRESENTED.

Question 1: Do you think that co-operation is feasible in the Managed Spectrum Park?

Yes. WISPA members have proved that many times in the way that they have worked together. However, the Park rules need to make this more feasible in regards to compatibility of technologies and bandwidth allocation. Some technologies have a smaller bandwidth requirement. LTE for fixed Internet usage, for example, requires 40MHz to provide the performance required by most users.

Question 2: When considering MSP spectrum allocations, what allocation method(s) would be preferable to you?

We prefer a regional single party with an administrative application. This ensures that the government's policies, for example enhancing rural coverage, can influence the choice.

Question 3: What are your thoughts on the level of technical requirements/rules in relation to MSP licenses?

The existing regional boundaries based on historic TLAs is not ideal. It would be better to look at regions that are more suitable to RF use where terrain creates a boundary between regions. There needs to be a balance struck between strict technical requirements that limit flexibility and innovation and more loose requirements that would make it more difficult to define clear boundaries between license holders.

Question 4: What are your thoughts on the best method(s) for future regional/non-national spectrum allocations?

The vast majority of existing 2.6GHz usage is for fixed wireless access in rural areas. The current method of costing based on population causes a problem where users have to pay more where their coverage includes dense urban areas that are well served by fibre and MNO's with much more spectrum available so are not likely to use the fixed wireless services. As above with Q3, geographical boundaries should be realigned to more readily suit terrain and population areas. Spectrum needs to be used so robust implementation rules need to be put in place to ensure that it is used within a reasonable time period.

Question 5: Should priority be given to incumbents over new entrants?

Yes, priority should be given to incumbents over new entrants providing the incumbents have a proven track record of utilising the spectrum well in their region.

Question 6: Is the market big enough to support sub-regional competition?

Sub-regional competition is already happening independent of spectrum allocation. There is no need to break the allocations down into sub-regions.

Question 7: Should spectrum allocation rules be used to limit consolidation (mergers or take-overs) of regional players?

There should be rules limiting the number of regions that one entity can have and this will address consolidation issues. Current rules appear to be adequate in this regard.



WISPA



Question 8: What are your thoughts on how to protect regional rights for regional use?
In order to protect regional rights effective rules need to be in place to ensure that national providers who already have other national spectrum rights should not be allocated regional rights. Robust implementation rules and monitoring needs to be done. The RSM should support existing rights holders that have complied with the rules and be the final arbiter when it comes to an impasse between applicants/rights holders.