

# Submission on discussion document: review of radio spectrum licence fees

## Your name and organisation

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## General questions

### Questions for organisations and businesses

CAMA operates within the **broadcasting and media sector**, specifically focusing on **Community Access Media**. Our member stations provide non-commercial broadcasting services across Aotearoa, ensuring diverse communities—including ethnic minorities, people with disabilities, and those in rural areas—have access to locally relevant media, pursuant to Section 36(c) of the Broadcasting Act 1989.

CAMA represents **12 Community Access Media stations** that collectively hold approximately **17 spectrum licences** for AM and FM broadcasting.

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Before considering changes to fees, are you planning to increase or decrease the number of licences you or your organisation hold over the next five years? If yes, please indicate the expected proportion of this change.

Community Access Media stations aim to maintain their existing spectrum licences. However, **expansion or modification is unlikely** due to financial constraints. The proposed fee increase may even force some stations to **reconsider their current holdings** due to affordability concerns.

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What proportion of your licences do you expect will need to be modified in the next five years?

Some stations may require **minor modifications** due to changes in transmission infrastructure or emergency preparedness measures. However, the high costs associated with **option two** could significantly hinder such modifications.

## Questions about the proposals in the discussion document

### Options for annual licence fee changes

1

What do you see as the advantages and disadvantages of option one?

**Advantages:**

- Provides **some predictability** for Community Access Media stations regarding cost increases.
- Less severe than option two in terms of immediate financial burden.

**Disadvantages:**

- Still represents a **significant cost increase** (from \$130.43 to \$178.30) which Community Access Media stations may struggle to afford.
- Does not account for the **public service function** of Community Access Media, particularly in **emergency broadcasting** and **representation of minority communities**.
- Fails to differentiate between **non-commercial community broadcasters** and **profit-driven commercial entities**.

2

What do you see as the advantages and disadvantages of option two?

**Advantages:**

- Encourages efficient spectrum use by applying higher fees for new and modified licences.

**Disadvantages:**

- **Disproportionate impact on Community Access Media stations** relies on limited public funding. For context, licenses vary across the stations, with some hoping to secure AM frequencies to ensure communities have access to services during natural disasters and emergencies.
- Increases costs for **expanding or modifying services**, which could reduce innovation and the ability to **reach underserved populations**.
- **Contradicts the UN's recognition** of community radio's role in fostering **democracy, education, and cultural preservation**, as outlined in UNESCO's **Community Media Sustainability Policy**.

3

Neither option is ideal. However, **option one is the lesser of two evils** as it does not impose the same extreme cost barriers as option two.

We strongly recommend a **third option** where **Community Access Media stations are exempt or receive subsidised fees** in recognition of their **public service role**.

4

Is there any other option that has not been considered in this document? If yes, please explain this option in detail, including why it is preferable to option one and two.

Yes, a **Public Service Exemption Model** should be introduced. Under this model:

- **Community Access Media stations would be classified separately** from commercial entities and either **exempted from fee increases** or given **reduced rates**.
- Fees for Community Access Media stations could be covered under **government funding portfolios** related to **public service broadcasting and emergency management**.

- This aligns with **international best practices**, such as in **Canada and parts of Europe**, where community radio receives **state support due to its role in public welfare**.

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What impact will the fee increase have on your business or entity?

- The proposed fee increases **threaten the financial sustainability** of Community Access Media stations.
- **CAMA's 2024 Resourcing Snapshot shows operational costs already exceed available funding** with an **\$80K expected funding shortfall**. See more [here](#).
- Transmission costs are a **major burden**, with some stations paying over **\$50,000 annually**. Furthermore, transmission costs and availability vary significantly from station to station according to the service provider, which is problematic for all radio providers.
- Higher fees could result in **station closures, reduced services, or limitations on emergency broadcasting capabilities**.

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How would fee option two impact the licensing decisions of your organisation or entity over the next five years?

- Fee increases under option two would make **new licence applications or modifications financially unfeasible - particularly stations hoping to broaden their licences**.
- Some stations may **downscale operations**, reducing local programming and community engagement.
- This could **undermine Aotearoa New Zealand's commitment to media diversity**, particularly for **minority language groups and rural communities**.