



*The Tasman Broadcasting Trust t/a Fresh FM*

Privacy of natural  
persons

*In Confidence*

Tēnā koe,

Fresh FM appreciates the opportunity to provide feedback on the review of Radio Spectrum licence fees. As the Community Access Media station for Te Taihū, we serve a vital role in providing diverse, locally relevant, and non-commercial broadcasting that reflects the voices of our communities.

We recognise the importance of an efficient and sustainable spectrum management system. However, we urge MBIE to consider the unique public service function of Community Access Media and the financial constraints we face. Increased spectrum fees would place additional strain on already limited resources, potentially impacting our ability to deliver essential services, including emergency broadcasting and community-led programming.

Our submission outlines our concerns with the proposed fee structures and advocates for a Public Service Exemption Model that better reflects the role of non-commercial broadcasters. We welcome further consultation to ensure that any changes support, rather than hinder, community broadcasting in Aotearoa.

Ngā mihi nui,

Ceara McAuliffe Bickerton

Change Manager

The Tasman Broadcasting Trust t/a Fresh FM



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

### Your name and organisation

<b>Name</b>	Ceara McAuliffe Bickerton
<b>Organisation</b>	The Tasman Broadcasting Trust t/a Fresh FM

### General questions

#### Questions for organisations and businesses

	<p>The Tasman Broadcasting Trust t/a Fresh FM operates within the <b>broadcasting and media sector</b>, specifically we are the <b>Community Access Media Station for Te Taihu, the Top of the South Island</b>. We are one of 12 Community Access Media Stations around New Zealand that 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.</p>
2	<p>A</p> <p>Fresh FM holds three FM Licenses for our FM Broadcasting (specifically these are 104.8 Tākaka Hill, 95.0 Tākaka and 88.9 Goulters Hill)</p>
3	<p>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.</p> <p>Fresh FM has no plan to increase our number of frequencies at this time. There are areas of our region that our current broadcast locations and frequencies don't cover but we see expanding our broadcasts into those areas as cost prohibitive.</p>
4	<p>What proportion of your licences do you expect will need to be modified in the next five years?</p>

None currently.

## Questions about the proposals in the discussion document

### Options for annual licence fee changes

1	<p>What do you see as the advantages and disadvantages of option one?</p> <p><b>Advantages:</b></p> <ul style="list-style-type: none"><li>• Provides <b>some predictability</b> for Fresh FM regarding cost increases.</li><li>• Less severe than option two in terms of immediate financial burden.</li></ul> <p><b>Disadvantages:</b></p> <ul style="list-style-type: none"><li>• Still represents a <b>significant cost increase</b> (from \$130.43 to \$178.30) which Community Access Media stations including Fresh FM may struggle to afford.</li><li>• Does not account for the <b>public service function</b> of Fresh FM and other Community Access Media, particularly in <b>emergency broadcasting</b> and <b>representation of minority communities</b>.</li><li>• Fails to differentiate between <b>non-commercial community broadcasters</b> and <b>profit-driven commercial entities</b>.</li></ul>
2	<p>What do you see as the advantages and disadvantages of option two?</p> <p><b>Advantages:</b></p> <ul style="list-style-type: none"><li>• Encourages efficient spectrum use by applying higher fees for new and modified licences.</li></ul> <p><b>Disadvantages:</b></p> <ul style="list-style-type: none"><li>• <b>Disproportionate impact on Community Access Media stations including Fresh FM</b> who rely on limited public funding.</li><li>• Increases costs for <b>expanding or modifying services</b>, which could reduce innovation and the ability to <b>reach underserved populations</b>.</li></ul>

- **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

Which option do you prefer? Why?

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.

Fresh FM believes that as we are providing a non-commercial service with content created by and for the community (and for its benefit), that we should fall into a third subsidised option.

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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**.

5

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

- The proposed fee increases **threaten the financial sustainability** of Fresh FM and other 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**.

6

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

We plan to hold our current licenses. There are areas of our region that our current broadcast locations and frequencies don't cover but we see expanding our broadcasts into those areas as unaffordable.

### Closing comments

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Are there any other comments you wish to make?

- **Fresh FM and other Community Access Media's radio services are a vital civic asset**, particularly in times of crisis. During the **Hawke's Bay floods (2023)**, AM radio was the sole lifeline for some communities. See more [here](#).
- The **United Nations** has repeatedly emphasised the role of **community access media** in promoting **social cohesion, local democracy, and emergency preparedness**.
- The New Zealand government should **recognise Community Access Media as critical infrastructure/lifeline utilities** and **exempt it from spectrum fee increases or provide dedicated funding to offset costs**.



- We urge MBIE to consult further with the **Community Access Media Alliance** and **NZ On Air** to ensure fee structures do not unintentionally **harm non-commercial broadcasters**.
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