

Please direct any questions that you have in relation to the submission process to Radio.Spectrum@mbie.govt.nz.

Submission on discussion document: review of radio spectrum licence fees

Your name and organisation

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Organisation	Kiwiwifi

General questions

Questions for organisations and businesses

1	Telecommunications
2	Approximately how many licences do you or your organisation hold? 60
3	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. Increase by 20%
4	What proportion of your licences do you expect will need to be modified in the next five years? Around 10%

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: Consistency with existing practices Disadvantages: Cost increase is unfair to small organisations
2	What do you see as the advantages and disadvantages of option two? Advantages: Modest cost increase in standard fees Disadvantages: Licence holders will be disincentivised from updating licence details when minor changes are made, and disincentivise equipment upgrades.

3 Which option do you prefer? Why?

Neither option is preferred.

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.

The Radiocommunications Act 1989 establishes separate rules for the registration of radio and spectrum licences. As a result of these separate rules, a Rightsholder can operate multiple co-located transmitters at a location with a single licence. Radio licence holders operating similar systems are required to hold a separate licence for each transmitter, putting them at a financial disadvantage to Rightsholders.

The most significant use of the Register of Radio Frequencies (RRF) is by Rightsholders for spectrum licence type "Spectrum Private/Other (Spectrum) (SZ)". Around 81% of all licences in the RRF fall into this category.

On the matter of fee payment, the Radiocommunications Regulations 2001 distinguish Radio Licences from Spectrum Licences, with the former covered by (38) and the latter by (39). Licensees (38) and Rightsholders (39) are directed to pay fees set out in the fourth column of Schedule 6 - the schedule RSM seeks to amend in this exercise. In the current fee structure, Radio and Spectrum licences are assessed the same standard licence fee.

We propose Spectrum Private/Other licences are treated as a separate Fee Category (E). Fees for Category E should be increased by 36% increase, while all other fee categories should be increased by only 20%. This would lessen the disadvantage of individual licence holders are at due to their increased licensing requirements.

A separate fee category for "Spectrum Private/Other (Spectrum) (SZ)" licences with the proposed increase would meet RSM's revenue targets while ensuring fees are equitable, efficient, and justifiable.

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

The fee increase will not have a significant impact on our business.

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

Under fee option 2 we would be less likely to modify existing licences.

Closing comments

7	Are there any other comments you wish to make?
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