

Submission on discussion document: review of radio spectrum licence fees

Your name and organisation

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Organisation	Amuri Net Limited

General questions

Questions for organisations and businesses

1	What sector of the economy do you or your organisation operate in? ISP
2	Approximately how many licences do you or your organisation hold? 445
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. We will keep licence numbers much the same.
4	What proportion of your licences do you expect will need to be modified in the next five years? Not many

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? If you were expanding or new to RSM then this is good. Not so good when no expansion is happening.
2	What do you see as the advantages and disadvantages of option two? This is good for stable network operators, yet recovers more of actual cost for those expanding which seems to be the issue you are trying to solve.

3 Which option do you prefer? Why?

We prefer option 2

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.

Charging LEO operators could be a new revenue opportunity. This is the new wave of spectrum usage. Some may not need any NZ based infrastructure and RSM will miss capturing any revenue.

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

Increased cost at a time when increased competition.

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

We are unlikely to increase the number of licenced links we deploy but understand that RSM need to recover costs.

Closing comments

7 Are there any other comments you wish to make?

There is a greater use of LEO services, and operators use large channels at no cost between the satellite and end user. If space lasers are used then NZ based ground stations may not even be needed or reduced in number. LEO operators have huge numbers of end users with transmitting antennas and pay nothing compared to a ground based operators. RSM could introduce licensing for LEO to makeup short fall. We understand RSM has no control over the space network, however charging for ground base transmitters could be done.

LEO operators have the potential to capture large market share (and have already done so in places) and effectively reduce NZ based operators revenue. Licenced links and MSP could be handed back due to reduction of end users to make it viable.