25 March 2025

Radio Spectrum Management Policy and Planning
Building, Resources and Markets
Ministry of Business, Innovation and Employment
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Viasat Response to "Review of Radio Spectrum Licence Fees 2025 Consultation Document"

Thank you for the opportunity to respond to the Ministry of Business, Innovation and Employment's (Ministry) "Review of radio spectrum licence fees 2025 Consultation Document".

1. **General Question - What sector of the economy do you or your organisation operate in?**

Viasat is a leading global technology company, helping a rapidly changing world solve its most demanding connectivity needs. To this end, Viasat powers some of the world's most important communications solutions — on the ground, in the air, at sea, and in space.

In terms of specific sectors, Viasat operates in the following areas:

- Aviation. With more than 30 years of experience delivering innovation from cockpit to cabin, Viasat is helping its customers harness the power of connectivity to make their vision a reality. Viasat provides Wi-Fi service to customers on Air New Zealand and Qantas as part of this innovation.
- Government. Governments trust Viasat to deliver global, mobile communications with secure satellite access, paired redundancy, and automatic backup switching.
- Enterprise. Organizations who automate, mine, extract, move, save, and inform trust our IoT connectivity solutions to deliver safer, more efficient, and more sustainable operations.
- Maritime. Inmarsat Maritime delivers connectivity solutions that provide the reliability our customers need to stay connected at sea.
- Energy. Viasat's energy services accelerate transformation through new technologies, solutions, and our enhanced ability to scale worldwide to the most challenging places.
- Satellite Internet. We bring reliable, high-speed connectivity to the hardest-to-reach people, places, and things — including communities and businesses in rural or remote areas.

In 2023, Viasat acquired Inmarsat, a company that has established Earth stations in Albany, Awarua and Warkworth. Inmarsat has provided global GMDSS coverage for the maritime industry for many years – an industry that provides service for approximately 80% of the world's trade. More recently, Viasat won a substantial contract with Australia and New Zealand to provide the Southern Positioning Augmentation (SouthPAN) satellite service.

2. **General Question - Approximately how many licences do you or your organisation hold?**

Approximate number of licences held is 271.

3. **General Question - 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.**

Viasat plans to increase the number of licences held over the next five years; however, further information on these plans is not for public release at this time.

4. **General Question - What proportion of your licences do you expect will need to be modified in the next five years?**

Viasat does not plan to make significant modifications to existing licences.

1. **Proposal Question - What do you see as the advantages and disadvantages of option one?**

Option one is consistent and repeatable. It simplifies estimating current and future costs for budgeting purposes. However, this option does not apportion the costs of specific licensing actions to the users.

2. **Proposal Question - What do you see as the advantages and disadvantages of option two?**

Option two more accurately apportions the costs related to the process of assessing and granting licences. This means that the costs associated with changes such as initial licensing and modifications to licences are paid by those seeking a new licence or a licence modification.

3. **Proposal Question - Which option do you prefer? Why?**

Viasat prefers option two.

Viasat considers that the costs should be apportioned on a broad “user pays” basis, so that the service user pays the costs. Further, as noted above, Viasat will increase the number of licences over time. While these licence costs will be greater initially, over time, these costs will be sunk, and the slightly cheaper option two will be a better option financially.

4. **Proposal Question - 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.**

Viasat has no comment on this question.

Yours Sincerely,

Cristian L. Gomez

Vice President
Government and Regulatory Affairs
Asia Pacific, Viasat Inc.
Privacy of natural persons