

Submission on discussion document: review of radio spectrum licence fees

Your name and organisation

Name	Don Wallace
Organisation	New Zealand Association of Radio Transmitters (NZART)

General questions

Questions for organisations and businesses

- 1** The Voluntary sector; Amateurs are all unpaid volunteers and provide community services.
- 2** Amateur organisations currently hold a total of 360 repeater and beacon licenses. Most of these are paid for by NZART branches with NZART headquarters paying for 68 of these licences on behalf of branches that cannot afford the cost.
- 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.

No, we expect to have about the same number of licences as at present
- 4** What proportion of your licences do you expect will need to be modified in the next five years?

A few modifications are expected as sites change but these will be carried out by our own AREs with little or no involvement of the Ministry.

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?

Options one and two are identical for Amateurs - a proposal to increase our fees by 36% to \$59.50.

We do not understand why the paper is proposing that Amateurs pay a higher percentage (14%) above the “normalised fee” when the proposed fee for other

licensees is only 5% or 6% above this. If the same increase was applied to Amateurs, the fee would be approximately \$55.

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

Options one and two are identical for Amateurs - see above.

3 Which option do you prefer? Why?

Options one and two are identical for Amateurs - see above

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

Given that the repeaters, for which the majority of the fees are being charged, are providing a public good, we submit that RSM should, under section 135 of the Act, waive the fees payable.

Most of our licences are for repeaters that have been installed to allow Amateurs to prepare for, and meet, communication needs in support of disaster relief as required in the Amateur licence conditions. (Amateur GURL section 5 clause 6)

As an example, during Cyclone Gabriel, Amateur repeaters were used for welfare communications as most other installations had failed.

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

As a voluntary organisation, any fees reduce the amounts we have available for investment in equipment used to provide services to the public.

Any increase in license fees will mean as equipment fails, we may not be able to afford repairs meaning that existing licenses may not get renewed, and we will start losing our abilities to carry out our community/civil services as a direct result.

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

Options one and two are identical for Amateurs - see above

Closing comments

7

Are there any other comments you wish to make?

Yes. Any fees are an impost on individual Amateurs as, unlike commercial operators, radio amateurs have no mechanism for recovering the costs of these licences as they are prohibited by law from charging for their services. (Amateur GURL section 5 clause 3)

We submit that, as part of the fees review, RSM should consider waiving the fees paid by amateurs for providing a public good and community services.