

# Submission template - Review of radio spectrum licence fees

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## Instructions

This is the submission template for the discussion document *Review of radio spectrum licence fees*.

The Ministry of Business, Innovation and Employment (**MBIE**) seeks written submissions on the issues raised in the discussion document by **5pm on 11 April 2025**. Please make your submission as follows:

1. Fill out your name and organisation (if applicable) in the table, “Your name and organisation”.
2. Fill out your responses to the questions in the template. Your submission may respond to any or all of the questions from the discussion document. Where possible, please include evidence to support your views, for example references to independent research, facts and figures, or relevant examples.
3. When sending your submission:
  - a. Delete the first page of instructions.
  - b. Include your email address and telephone number in the email or cover letter accompanying your submission – we may contact submitters directly if we require clarification of any matters in submissions.
  - c. If your submission contains any confidential information:
    - Please state this in the cover letter or email accompanying your submission and set out clearly which parts you consider should be withheld, together with the reasons for withholding the information. MBIE will take such objections into account and will consult with submitters when proactively releasing submissions or responding to requests under the Official Information Act 1982.
    - Indicate this on the front of your submission (e.g. the first page header may state “In Confidence”). Any confidential information should be clearly marked within the text of your submission (preferably as Microsoft Word comments).
    - Please provide a separate version of your submission excluding the relevant information for publication on our website (unless you wish your submission to remain unpublished). If you do not wish your submission to be published, please clearly indicate this in the cover letter or email accompanying your submission.
    - Note that submissions are subject to the Official Information Act 1982.
4. Send your submission:
  - as a Microsoft Word document or PDF to [Radio.Spectrum@mbie.govt.nz](mailto:Radio.Spectrum@mbie.govt.nz) subject line: ‘Review of radio spectrum licence fees’ (preferred),
  - by mailing your submission to:

Radio Spectrum Management Policy and Planning  
Building, Resources and Markets  
Ministry of Business, Innovation & Employment  
PO Box 1473  
Wellington 6140  
New Zealand

Please direct any questions that you have in relation to the submission process to [Radio.Spectrum@mbie.govt.nz](mailto:Radio.Spectrum@mbie.govt.nz).

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

### Your name and organisation

<b>Name</b>	Duncan Watson
<b>Organisation</b>	Motutapu Outdoor Education Trust

### General questions

#### Questions for organisations and businesses

<b>1</b>	Education (Outdoor, Experiential)
<b>2</b>	Approximately how many licences do you or your organisation hold? One
<b>3</b>	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
<b>4</b>	What proportion of your licences do you expect will need to be modified in the next five years? Nil unless we go from Analogue to Digital which may trigger modification

### Questions about the proposals in the discussion document

#### Options for annual licence fee changes

<b>1</b>	What do you see as the advantages and disadvantages of option one? While this will have minimal administrative cost it will not take into account the type of use, size / resources of the licence holder or if they operate for commercial gain, or not. As we are a Charitable Trust and the radio frequency is used for safety, emergency monitoring and communication there is no commercial gain from this. It is simply an overhead.
<b>2</b>	What do you see as the advantages and disadvantages of option two?

This will provide specific analysis of the licence holders with a view to apportioning costs however this will take time hence add cost to the process.

3 Which option do you prefer? Why?

I would have to see the various costing models to comment however Option 2 seems the fairer one assuming costs of vetting can be controlled.

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.

Base the fee on Annual Revenue of the licence holder.

Make NFP's low cost or free.

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

Just another increased cost to absorb or pass on.

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

No Impact

## Closing comments

7 Are there any other comments you wish to make?

Why was the erosion of the next egg allowed to happen? Surely going from such a surplus of \$12mil to Zero in 10 years could have been better managed? We're all accustomed to increased however gradual, annual increases are far easier to budget for.