

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

Name	Jesse archer
Organisation	Full Flavour Limited

General questions

Questions for organisations and businesses

1	What sector of the economy do you or your organisation operate in? Rural broadband - Wireless ISP
2	Approximately how many licences do you or your organisation hold? 71
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 are steadily increasing licenses as we role out more licensed links (replacing 5Ghz links) and using 3Ghz spectrum for access points
4	What proportion of your licences do you expect will need to be modified in the next five years? Unsure

Questions about the proposals in the discussion document

Options for annual licence fee changes

1	<p>What do you see as the advantages and disadvantages of option one?</p> <p>Advantage - it's simpler which is preferred. But to be clear, we do NOT support a 36% increase in fees.</p>
2	<p>What do you see as the advantages and disadvantages of option two?</p> <p>It's more complex.</p>
3	<p>Which option do you prefer? Why?</p> <p>1 - but we do NOT support a 36% increase in fees.</p>
4	<p>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.</p> <p>1) Reduce RSM's cost - a third party should do an audit of RSM's costs and recommendations should be actioned so that RSM is more cost efficient 2) Are our resource fees going into the RSM pool to cover this work? If not, they should be. 3) RSM should open 3340-3380 with urgency and the additional resource fees paid by WISPs could then contribute towards RSM's operational costs.</p>
5	<p>What impact will the fee increase have on your business or entity?</p> <p>We are working hard to control costs, and a 36% fee increase due to RSM's mismanagement of the situation is unacceptable.</p> <p>Increased costs from RSM (or any supplier for that matter) mean reduced investment in other areas of the business to the detriment of customers.</p>
6	<p>How would fee option two impact the licensing decisions of your organisation or entity over the next five years?</p> <p>N/A - we don't support option two.</p>

Closing comments

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Are there any other comments you wish to make?