

Submission on discussion document: review of radio spectrum licence fees

Your name and organisation

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Organisation	PrimoWireless Ltd

General questions

Questions for organisations and businesses

1	Telecommunications
2	Approximately how many licences do you or your organisation hold? 250+
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 would be status quo or decreasing.
4	What proportion of your licences do you expect will need to be modified in the next five years? Not many, if any – as a percentage I could only guess and say less than 5%.

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? Higher costs for us as we are predominately renewals and do not plan to do many new links or spectrum licenses.
2	What do you see as the advantages and disadvantages of option two? Cheaper costs for us as we are predominately renewals and do not plan to do many new links or spectrum licenses.

3 Which option do you prefer? Why?

Option 2 – as it would be cheaper for us.

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.

n/a

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

Yes in 2 ways:

1 - we are wondering if the 3ghz licenses we hold are worth it, as we need to pay resource fees as well as licenses fees for every AP, we have also recently scrapped all of our 2.6ghz MSP holdings for the same reason, the reason being the resource and license costs outweigh the benefit of having the spectrum for the small numbers of customers it serviced.

2 - we are reviewing our current licensed links to see what ones we could change back to unlicensed 5ghz spectrum as to avoid paying the license fees, as some sites just dont have the customer numbers on them make them financially viable.

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

We aren't planning much expansion and have little need for new licenses, so this is not something that will effect us.

Closing comments

7 Are there any other comments you wish to make?

n/a