

Submission on discussion document: review of radio spectrum licence fees

Your name and organisation

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Organisation	Plains FM 96.9

General questions

Questions for organisations and businesses

1	<p>We are the trading arm of The Canterbury Communications Trust operating within the community access broadcasting and media sector, specifically focusing on assisting individuals, agencies, community groups and NGOs to broadcast their own content in a range of languages since February 1988. We provide non-commercial broadcasting services to Cantabrians as content makers and listeners ensuring diverse communities—including ethnic minorities, people with disabilities, children/youth and those in rural areas—have access to locally relevant media, pursuant to Section 36(c) of the Broadcasting Act 1989.</p>
2	<p>Approximately how many licences do you or your organisation hold?</p> <p>We hold 1 spectrum licence for FM broadcasting.</p>
3	<p>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.</p> <p>We aim to maintain our existing spectrum licence. Expansion or modification is unlikely due to financial constraints.</p>
4	<p>What proportion of your licences do you expect will need to be modified in the next five years?</p>

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?

Advantages:

- Provides some predictability regarding cost increases.
- Less severe than option two in terms of immediate financial burden.

Disadvantages:

- Still represents a significant cost increase (from \$130.43 to \$178.30)
- Does not account for our public service function.
- Fails to differentiate between non-commercial community broadcasters and profit-driven commercial entities.

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

Advantages:

- Encourages efficient spectrum use by applying higher fees for new and modified licences.

Disadvantages:

- Increases costs for expanding or modifying services, which could reduce innovation and the ability to reach underserved populations in our region.
- Contradicts the UN's recognition of community radio's role in fostering democracy, education, and cultural preservation, as outlined in UNESCO's Community Media Sustainability Policy.

3 Which option do you prefer? Why?

Neither option is ideal. Option one is preferred as it does not impose the same cost barrier as option two.

We would strongly support a third option where Community Access Media stations like us are exempt or receive subsidised fees in recognition of our key public service role.

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, a Public Service Exemption Model should be introduced. Under this model:

Community Access Media stations like Plains FM would be classified separately from commercial entities and either exempted from fee increases or given reduced rates.

- Fees for Community Access Media stations could be covered under government funding portfolios related to public service broadcasting and emergency management.
- This aligns with international best practices, such as in Canada and parts of Europe, where community radio receives state support due to its role in public welfare.

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

- The proposed fee increases threaten the financial sustainability of PlainsFM.

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

- Fee increases under option two would make new licence applications or modifications financially unfeasible - particularly stations hoping to broaden their licences.
- Given our commitment to providing content by, for and about regional communities across a range of languages we may need to consider downscaling operations, reducing local programming and community engagement.

Closing comments

Are there any other comments you wish to make?

- Plains FM's radio service is a vital civic asset, particularly in times of crisis. We were very active after the Chch earthquakes, the Chch Mosque attacks and the pandemic - providing key information and support to many different groups within our community.
- The United Nations has repeatedly emphasised the role of community access media in promoting social cohesion, local democracy, and emergency preparedness.
- The New Zealand government should recognise Community Access Media as critical infrastructure/lifeline utilities and exempt it from spectrum fee increases or provide dedicated funding to offset costs.

- I urge MBIE to consult further with the Community Access Media Alliance and NZ On Air to ensure fee structures do not unintentionally harm non-commercial broadcasters.
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