

Submission template - Review of radio spectrum licence fees

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submission excluding the relevant information for publication on our website (unless you wish your submission to remain unpublished).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 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.

Submission on discussion document: review of radio spectrum licence fees

Your name and organisation

Name	Paul D Godolphin
Organisation	Amateur Radio Service VHF Node Licencee (callsign Z L 1 L I N K) Pukekohe

General questions

Questions for organisations and businesses

1	The Amateur Radio Service, as administered by NZART on behalf of RSM
2	Approximately how many licences do you or your organisation hold? One
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
4	What proportion of your licences do you expect will need to be modified in the next five years? None

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? Only that it may satisfy MBIE's need to increase the funding flow, but not in the Amateur Service. In the Amateur Service, it offers no advantage to RSM/MBIE because there is little to no such cost shortfall, with licencing handled by administration delegated to NZART at NZART and the Licencee's expense. RSM only handle renewals, at virtually zero cost, by annual email.
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2

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

Option TWO offers a fair pricing structure reflective of the ACTUAL cost to RSM in line with the objectives of this review.

ie.. Initial frequency allocation, band planning and technical considerations in the SETUP of Non-Amateur stations justify existing fees, but AMATEUR RENEWALS are virtually cost-zero, being solely an electronic mail process to gather the annual fees, and in the case of the Amateur Service, SETUP engineering is administered internally within NZART's ELG (Electronic Liaison Group) with all RSM functions presented already completed. Thus in the case of the Amateur Service, there is no cost or justification for any increase in fees by RSM. This is a unique 'zero funding' situation only relevant to the Amateur Radio Service, where the delegated body (NZART) and applicant are absorbing all costs that other Spectrum users might expect to pay for RSM services.

3

Which option do you prefer?

Option Two, with the added comment that consideration might be given to completely WAIVING future renewal fees to the Licenced Amateur Service in line with the recent dropping of annual fees to GURL holders.

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.

See no.3 above

5

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

If increased, it would effectively close down a region-wide VHF service that provides wide area coverage and emergency standby communications. It is privately funded for community use by the licensee from personal funds on a retirement pension.

6

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

If no increase or in fact, a WAIVING of renewal fees, it would greatly assist the licensee in maintaining an important regional service.

Closing comments

7

Are there any other comments you wish to make?

Yes, thanks for asking. Amateur Service's provides emergency and disaster standby cover at their own expense, and at NO expense to MBIE or RSM.