

Submission on discussion document: review of radio spectrum licence fees

Your name and organisation

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Organisation	SRS New Zealand Ltd

General questions

Questions for organisations and businesses

1	Manufacturing
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? Advantage = A fair and even price to everyone. Those renewing and those obtaining a new licence for the first time. new license cost will not be a barrier to compliance. Disadvantage = Increase in business compliance costs.
2	What do you see as the advantages and disadvantages of option two? Advantage = Annual renewal fee is lower than option one by a few dollars. But not a significant amount, so not a real advantage.

Disadvantage = A huge expense for anyone or any business requiring a new licence for the first time. This could be a barrier preventing a business from buying and using a licence. They may have to find an alternative solution to a radio that may not be as efficient or effective. It could also lead to an increase in the use of radios without a licence, this can negatively impact licenced users especially when it bleeds over into their frequency.

3 Which option do you prefer? Why?

Option one, as it is a fairer to all users, new and old.

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.

no

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

Increase compliance costs.

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

Not sure, but would be a real barrier to getting any new licences.

Closing comments

7 Are there any other comments you wish to make?

No.