

2 April 2025

Radio Spectrum Management Policy and Planning
Building, Resources and Markets
Ministry of Business, Innovation and Employment
PO Box 1473
Wellington 6140

Email: Radio.Spectrum@mbie.govt.nz

Kia ora,

Submission on discussion document: Review of Radio Spectrum Licence Fees

Thank you for the opportunity to submit on the abovementioned consultation document.

Space Operations New Zealand Limited, trading as SpaceOps NZ, holds some 400 radio Earth-to-space radio transmitting licences in the UHF, VHF, S, Ku, and Ka bands for space operations on behalf of our customers and, in some cases, their customers. Most of the licences are in S-Band. The licences are for antennas at our Awarua Satellite Ground Station, Warkworth Space Centre, and our Invercargill and Lochiel sites.

We have a steady growth in licences of perhaps 50–100 each year and we relinquish around 20–30 licences each year as missions terminate. We see both of these numbers increasing. Most of the licence applications are very straightforward to deal with, being mostly nearly identical other than for the actual frequencies and modulations.

To be frank, we generally pass on the costs of obtaining and holding licences to our customers and so we are neutral as to which fee model RSM adopts. Our customers are all based overseas and they are used to dealing with a range of national radio administrations: they are all used to paying much more for radio licences than they do in New Zealand.

Much more important to us than the price of the fees is for RSM to be fully funded one way or the other so that:

1. RSM can turn around our radio transmitting licence applications quickly, preferably within a few weeks.
2. RSM can quickly provide us with short-term (usually for less than a week) radio transmitting licences for spacecraft emergency cross support: we would be prepared to pay a large premium for being granted licences within 12 hours or less of us

requesting them in order for us to provide critical and urgent communications to spacecraft in difficulties.

3. Knowledgeable and competent RSM engineers who can easily engage with us when we seek transmitting licences that are not well aligned with RSM's spectrum allocations. We need this soft of access to very experienced RSM engineers around once every five years.
4. The radio licence on-line database/website is well maintained and easy to use.

Not touched in the consultation document is the possibility of reducing the administrative burden for both RSM and us by:

1. Allowing us to have a private spectrum management right at Awarua Satellite Ground Station in order for us to manage the transmitting licences there, enabling us to streamline licence applications for well-defined uses in agreed bands,
2. Allowing us to hold site-wide licences across Awarua Satellite Ground Station. Technically, a second transmitting licence is not required if the second transmitter is within 50 metres of the first antenna; however, many of our antennas that are to all intents identical and form a pool of interchangeable antennas, are just on 50 metres apart so that they do not block each others' horizon mask. Requiring us to only have one licence per spacecraft or constellation over the whole station is very desirable.

We are confident that significant savings all round could be implemented by so doing.

We would be pleased to speak to our submission.

Yours faithfully,



Robin McNeill
Chief Executive Officer