

Please direct any questions that you have in relation to the submission process to [Radio.Spectrum@mbie.govt.nz](mailto:Radio.Spectrum@mbie.govt.nz).

## Submission on discussion document: review of radio spectrum licence fees

### Your name and organisation

<b>Name</b>	Ross Tottenham
<b>Organisation</b>	Access Communications LTD

### General questions

#### Questions for organisations and businesses

1	Telecommunications
2	Approximately how many licences do you or your organisation hold? 25
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. 10% increase
4	What proportion of your licences do you expect will need to be modified in the next five years? 15-20%

### 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? Keeps the structure the same and consistent across licences. New or modified licence costs are too high in first year when implementing new service which requires new or modified licence. With land Mobile DMR systems there will be more modification to licences from FM which will make the change over cost much higher than it is today. There is no cost for this now. More likely to keep Licence records accurate and up to date if there is no change to modify them. (better outcome for all)
2	What do you see as the advantages and disadvantages of option two?

Too Higher cost in first year for implementing a new service which requires new or modified licence. Not a consistent change each year from day 1.

Licence records may become inaccurate as some operators will be reluctant to modify licence due to the high cost to do so.

3 Which option do you prefer? Why?

Option 1- keeps the fee consistent over the licence period (in years)

Whether doing the company or my own licence modifications there is no cost now. Big jump from \$0 to \$406 to do this in option 2.

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.

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

Profits will be down due to higher licence cost.

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

Slow down any growth due to higher cost for us and customers when setting up new service (licence). May not modify licence as mentioned above since cost is high.

## Closing comments

7 Are there any other comments you wish to make?

No