

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>	Tony Brown
<b>Organisation</b>	A D Brown Ltd

### General questions

#### Questions for organisations and businesses

1	Radio Frequency Engineering, Field Strength Measurements, Broadcast Surveys, Radio Interference investigation, Marine Radio Surveys, EMC/ Radiation Measurement.
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? Nil

### 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? Consistent, simple, not complicated and rational. No one likes fee increases but I guess they are inevitable.
2	What do you see as the advantages and disadvantages of option two?

No Advantages at all. Plenty of disadvantages as outlined below. The only beneficiaries are the likes of the Telcos who have stable licences which do not vary or require amendment.

3 Which option do you prefer? Why?

No 1... table 6. See below

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.

In the past there have been discussions re taxing Bandwidth, but became too complex to implement.

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

No 1...table 6... not much. No 2....table 7 alot.

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

Option 2...table 7 will have many issues which have not been thought through rationally.

## Closing comments

7 Are there any other comments you wish to make?

Re Option 2 ...Table 7

- Discriminates against some licence holders. E.g. Crane Control, Bush Winch operators, who have to change locations ... ST licences such as Events which run for a few days, having to be lumbered with a \$406 fee.
- What about minor amendments like change of aerial height, adding DMR, changing location by a few metres? All this minor stuff for a \$406 fee?
- If someone is non compliant with their licence, not only may they have to pay the \$1500 fine, but also the Engineering fee + \$406. This is triple jeopardy and hardly fair.
- The ARE does all the new/amendment work, has to charge out, yet RSM are reaping all the benefits of this extra tax.
- Adhere to paragraph 2 of your key objectives by keeping the structure simple as per the 4 existing categories.

- The \$4000 fee to add (or remove) one location for multi location pager and repeater licences is outrageous.
- If there is an error caused by Applicant/ ARE that requires a modification to a licence, there are going to be issues as to who pays the \$406 fee, which could lead to arguments and possible litigation. You need to remember that we are all human and do make errors. This could result in Engineers giving up and maybe issues down the track with personnel succession.
- In one recent case RSM forced a repeater channel change, notwithstanding RSM not complying with PIB38! Who pays the \$406 under option 2 / Table 7?