

# Submission template - AM /FM radio spectrum: 2031 expiry of licences and potential reassignment

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## Instructions

This is the submission template for the discussion document *AM /FM radio spectrum: 2031 expiry of licences and potential reassignment*.

The Ministry of Business, Innovation and Employment (**MBIE**) seeks written submissions on the issues raised in the discussion document by **5pm on 4 July 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submission excluding the relevant information for publication on our website (unless you wish your submission to remain unpublished).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](mailto:Radio.Spectrum@mbie.govt.nz) subject line: 'AM /FM radio spectrum: 2031 expiry of licences and potential reassignment' (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

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 - AM/FM radio spectrum: 2031 expiry of licences and potential reassignment

### Your name and organisation

<b>Name</b>	Jesse Archer
<b>Organisation</b>	Great Lake Media Limited T/A Peak FM Ruapehu

### General questions

#### Eligibility criteria for renewal

<b>1</b>	Should the Crown restrict eligibility to those with no outstanding fees? Should there be any exceptions to this?
	No comment

#### Moratorium prior to the rights expiry

<b>2</b>	Please provide any feedback you have on the proposed moratorium date. In what circumstances should an exception to the moratorium on modifications be allowed?
	There should be no moratorium. It's not fair to put a freeze on operators for a number of years on changes they may need to make to further improve their businesses. We intend to move sites, move licenses, seek to engineer new licenses over the next few years inline with wanting to improve coverage for our listeners and provide better value to our advertisers.

#### Proposed policy objectives for the allocation process

<b>3</b>	What amendments, if any, would you make to the proposed objectives and criteria?
<b>4</b>	Are there other objectives or criteria you would propose? If so, what are these?

## Approach to pricing commercial licences

5

Which is your preferred approach and why?

Pricing should reflect the declining use in FM – more listeners are transitioning to digital. We're also concerned that MBIE would seek to charge as much in a market such as Ruapehu where there is still spectrum available on the raster (e.g. a new frequency could be engineered if there was demand for it) - this indicates that in some areas, there simply isn't a great value in these licenses or someone would have already put them to use. Why should a community broadcaster in Ruapehu/Taumarunui pay the same rates per head of population as a broadcaster in the most competitive market in the country (Auckland).

6

Is there another approach you would suggest? If yes, please explain how this approach would be implemented and how it would provide greater benefit against the policy objectives than the above approaches.

We would be supportive of a % of revenue fee, similar to the music licenses we have to pay. This would greater reflect any commercial value we get out of the holding the licenses.

New frequencies should still be auctioned in the first instance.

## Price formula

7

Do you agree with the assumptions outlined to calculate a price offer? Why? Why not?

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## Duration of licences

8	Which of the two options do you prefer and why?
	20 years
9	Is there another option that should be considered? What would this be and why?
	20 years
10	What licence duration would make most sense for your company/organisation? Why?
	20 years
11	What should be the difference in tenure for AM vs FM, if any?
	No comment
12	What duration of time of non-use would be appropriate for triggering the Crown's right to take back the licence?
	The status quo (2 years) is appropriate

## RNZ and Schedule 7 provisions in the Radiocommunications Act

13	How do the sections of the Act advantage or disadvantage your business?
	No comment
14	How might the Crown provide fairness to all licence holders?
	No comment
15	What options do you see for how the Crown might address its preference for 10-year licences, given this legislative barrier? Would you prefer the options developed are operational or legislative? Why?

No comment

### Non-commercial use of AM/FM radio broadcasting spectrum

16

What changes, if any, should be made to the reservation of spectrum for iwi radio, community radio and RNZ?

No comment

### Currently reserved blocks

17

Should the reservations in block 16 – 19 continue into the new right in their current form? What changes would you make, if any?

No comment

18

If unused spectrum was to be released, what would bring greater benefits: reassigning these licences to commercial or other non-commercial use? If non-commercial, to whom? If commercial, how should it be made available to market?

No comment

### Local Commercial FM licences

19

Do you agree with comparing the original intent of LCFM with the proposals in this document to determine their continuation? If not, how would you prefer they were assessed?

No comment

20

Which option do you prefer: the proposal outlined or maintaining the status quo (Local Commercial licences remain, with strict conditions and are charged at a lesser price than commercial licences)? Please explain why you prefer this option.

No comment

21

If maintaining the status quo, how should the price be calculated to account for the retention of strict content provisions in the licence agreement while acknowledging that these are commercial licences with revenue potential?

No comment

22

If the proposal outlined is to progress, will there be enough time to transition by April 2031? If not, why not?

## Closing comments

Are there any other comments you wish to make?

- We don't support plans to block broadcasters acquiring new licenses or moving licenses to new sites
- Peak FM fulfills an important community good in the Ruapehu market – there is no RNZ coverage here, listeners are reliant on the local stations such as us in a civil defense situation (which is occurring much more frequently with increase in severe storms etc). License fees should reflect this and also reflect the low demand for licenses in places like this
- We could argue that the community good we serve should make us eligible for no renewal fee, especially given the Government's lack of investment in the district (i.e. there is no RNZ investment in Ruapehu)