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Radio Spectrum Management Policy and Planning
Building, Resources and Markets
Ministry of Business, Innovation & Employment
By Email: Radio.Spectrum@mbie.govt.nz

Subject: Submission on AM/FM Radio Spectrum: 2031 Expiry of Licences and Potential Reassignment

The National Pacific Media Trust (NPMT) is pleased to submit its feedback on the Ministry of Business, Innovation and Employment's discussion document, "AM/FM radio spectrum: 2031 expiry of licences and potential reassignment."

As a vital non-commercial broadcaster serving New Zealand's diverse Pacific communities, NPMT holds a critical role in preserving and promoting Pacific languages and cultures, providing essential community information, and acting as a lifeline utility during emergencies. Our submission addresses the questions posed in the discussion document, offering insights and recommendations from the perspective of a public service media organisation deeply committed to its mandate.

Our key points highlight the necessity of:

- Prioritising non-commercial spectrum based on its social and cultural value.
- Ensuring equitable treatment and long-term licence certainty (preferably 20 years) for all non-commercial public service broadcasters, including Pacific media.
- Establishing a dedicated spectrum reservation for Pacific media.
- Leveraging NiuFM's 23 years of expertise to establish a national youth FM broadcaster by gifting the National Youth Network frequency to NPMT.
- Recognising and supporting the critical role of AM transmission infrastructure for reaching vulnerable Pacific audiences, particularly in light of proposed decommissioning plans for facilities such as the Henderson AM Southern Mast.

We believe that the decisions made regarding spectrum allocation will significantly impact the future of cultural and community broadcasting in New Zealand. We urge the Ministry to

consider the unique needs and contributions of non-commercial entities like NPMT in shaping policies that foster a vibrant, diverse, and resilient media landscape.

Thank you for the opportunity to contribute to this important consultation. We are available to provide further clarification or discuss our submission in more detail if required.

Faka'apa'apa atu,

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Don Mann

Chief Executive Officer : The National Pacific Media Trust (Pacific Media Network)

Email: Redacted

Submission on discussion document - AM/FM radio spectrum: 2031 expiry of licences and potential reassignment

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| Name | Donald Mann, Chief Executive Officer |
| | Redacted |
| Organisation | The National Pacific Media Trust (Pacific Media Network) |

General questions

Eligibility criteria for renewal

1

Should the Crown restrict eligibility to those with no outstanding fees? Should there be any exceptions to this?

The National Pacific Media Trust (NPMT) generally agrees that the Crown should restrict eligibility to those with no outstanding fees. This promotes good financial stewardship and ensures that spectrum is allocated to responsible operators.

However, we propose an exception for non-commercial entities, particularly those serving cultural and linguistic minority communities, such as Pacific media organisations. In cases where outstanding fees are due to genuine financial hardship, and the organisation demonstrates a clear commitment to its public service mandate and a plan to address the arrears, a mechanism for exemption or a structured payment plan should be considered. This would prevent the disproportionate impact on smaller, community-focused broadcasters who often operate with limited resources and rely on public funding or community support. The primary objective for these entities should be their continued ability to serve their communities, especially in the preservation and promotion of Pacific languages, identity and culture.

Moratorium prior to the rights expiry

2 Please provide any feedback you have on the proposed moratorium date. In what circumstances should an exception to the moratorium on modifications be allowed?

The proposed moratorium date of 2 April 2026 for new commercial licences and modifications is understandable from an administrative perspective to ensure a smooth renewal process. However, NPMT believes that this moratorium should **not** apply to non-commercial licences, including those held by Pacific media organisations.

As noted in the discussion document, the moratorium would not apply to iwi and community licences administered by Te Puni Kōkiri and Ministry of Culture and Heritage. We strongly advocate for Pacific media licences to be treated similarly. Our operations often require flexibility to adapt to evolving community needs, demographic shifts, and technological advancements. Restricting modifications could hinder our ability to effectively serve our communities, especially in expanding coverage or improving signal quality in underserved areas.

Exceptions to the moratorium for non-commercial licences should be allowed for:

- **Expansion of coverage:** To reach new or growing Pacific communities.
- **Technical upgrades:** To improve broadcast quality or efficiency.
- **Relocation of facilities:** Due to operational necessity or community demand.
- **Emergency broadcasting needs:** To ensure resilience and reach during civil defence emergencies.
- **Compensation for loss of essential infrastructure:** In circumstances where a non-commercial broadcaster, such as NPMT's 531pi, loses access to critical transmission infrastructure (e.g., due to RNZ decommissioning the AM Southern Mast in Henderson) through no fault of their own, the moratorium should allow for the immediate gifting of an available frequency to compensate for the loss of AM transmission capability, ensuring continuity of service to the affected community.

Proposed policy objectives for the allocation process

3

What amendments, if any, would you make to the proposed objectives and criteria?

NPMT supports the proposed objectives of supporting continued use, balancing financial value with economic context, and fostering market competition. However, we propose the following amendments and additions to ensure a more equitable and culturally responsive allocation process:

- **Amendment to Objective (a) - Support the continued use of this spectrum by AM/FM radio broadcasters:**
 - Add: "The allocation process will explicitly recognise and prioritise the unique role of non-commercial broadcasters, particularly those serving Māori and Pacific communities, in preserving and promoting language, culture, and community cohesion."
 - This strengthens the commitment to non-commercial use beyond just "providing certainty."
- **Amendment to Objective (b) - Balance the financial value of the asset with the economic context:**
 - Add: "For non-commercial spectrum, the primary consideration will be the social and cultural value derived from its use, rather than purely financial returns. The allocation process will acknowledge the often-limited financial capacity of non-commercial entities."
 - This clarifies the different valuation approach required for non-commercial spectrum.

Are there other objectives or criteria you would propose? If so, what are these?

Yes, NPMT proposes the following additional objectives and criteria:

- **Objective (d): Promote Cultural and Linguistic Diversity and Preservation.**
 - **Description:** The allocation process will actively support and facilitate the broadcasting of content in Pacific languages and the promotion of Pacific cultures, contributing to the revitalisation and intergenerational transfer of these taonga. This includes ensuring adequate spectrum availability and supportive policy frameworks for Pacific media organisations.
 - **Criteria:**
 - **Accessibility:** Ensures that Pacific media organisations have equitable access to spectrum.
 - **Community Impact:** Measures the extent to which spectrum allocation enables broadcasters to serve the cultural, linguistic, and informational needs of Pacific communities.
 - **Sustainability:** Supports the long-term viability of Pacific media outlets.
- **Objective (e): Enhance Community Resilience and Information Dissemination.**
 - **Description:** The allocation process will recognise and bolster the critical role of community and cultural broadcasters, including Pacific media, as trusted sources of information, especially during emergencies and for reaching vulnerable populations.
 - **Criteria:**
 - **Reach:** Maximises the ability of community broadcasters to reach their target audiences.
 - **Reliability:** Supports robust infrastructure for consistent broadcasting, particularly in emergencies.

Approach to pricing commercial licences

5 Which is your preferred approach and why?

The questions regarding pricing approaches (A, B, C) are primarily relevant to commercial licences. As a non-commercial entity, the National Pacific Media Trust's primary concern is the continued availability of spectrum free of resource charges, consistent with current policy for non-commercial broadcasting.

However, if forced to choose an approach for commercial licences that might indirectly impact the overall spectrum landscape, NPMT would lean towards **Approach C: Price offer and auction (combination of A and B)**.

- **Why:** This approach offers a balance. The initial price offer provides some certainty for existing commercial operators (reducing disruption) while the auction mechanism for unaccepted offers ensures that unused spectrum is returned to the market and allocated efficiently. This hybrid approach could potentially free up spectrum that is not productively used by commercial entities, which *could* then be considered for reallocation to non-commercial uses if demand exists.

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.

For **non-commercial licences**, NPMT strongly advocates for the continuation of the current approach where spectrum is provided **free of resource charges**. This is critical for the sustainability of Pacific media organisations, which operate on limited budgets and are driven by public service rather than profit.

Any approach that introduces resource charges for non-commercial spectrum would be detrimental to our ability to serve our communities and fulfil our cultural and linguistic mandate. The benefits derived from Pacific media (e.g., language revitalisation, cultural preservation, community information, emergency broadcasting) are public goods that far outweigh any potential financial return from charging for spectrum.

Price formula

7

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

As the National Pacific Media Trust operates on a non-commercial basis and does not pay resource charges for spectrum, the specific assumptions outlined for calculating commercial price offers (e.g., industry annual growth factor, discount rate, per capita pricing) are not directly applicable to our operations.

However, we note that the proposed national FM median price for 2031 renewals (\$1.16 per capita for 20 years) reflects a significant reduction from previous prices. While this may be a positive development for commercial broadcasters, it underscores the difference in valuation between commercial and non-commercial spectrum. The public good provided by non-commercial broadcasting cannot be adequately captured or valued by a commercial pricing formula.

Duration of licences

8

Which of the two options do you prefer and why?

Between the two options presented for licence duration (1. Offer less time on licences, or 2. Give the Crown the right to take back unused licences), the National Pacific Media Trust prefers **Option 2: Give the Crown the right to take back unused licences in some circumstances.**

- Why: A shorter licence term (Option 1) creates unnecessary uncertainty and administrative burden for non-commercial entities like NPMT, hindering long-term planning and investment in infrastructure and content development. While we understand the Crown's desire for flexibility, a 10-year term is too short for strategic planning in a media landscape that requires significant investment. Option 2, with clear "use it or lose it" provisions, addresses the concern of "spectrum squatting" while allowing for longer licence durations (e.g., 20 years) for active broadcasters. This provides the stability needed for non-commercial organisations to secure funding, develop programming, and build community trust, while ensuring efficient spectrum use.
- Crucially, the "use it or lose it" edict should not apply in circumstances where NPMT loses the ability to access an AM mast in Auckland due to RNZ decommissioning it, as this is a situation outside the control of NPMT and directly impacts our ability to exercise our spectrum rights.

9

Is there another option that should be considered? What would this be and why?

Yes, NPMT proposes a third option for non-commercial licences:

- **Option 3: Differentiated Licence Durations based on Public Service Mandate.**
 - **Description:** For non-commercial broadcasters, particularly those with a clear public service mandate (e.g., iwi radio, community radio, and Pacific media), licences should be offered for the maximum statutory period of 20 years, with robust "use it or lose it" provisions. This acknowledges their

10

unique role and the long-term investment required to fulfil their cultural and community objectives.

- **Why:** This approach provides the necessary stability for non-commercial entities to thrive and plan for the future, without the constant pressure of short-term renewals. It aligns with the Crown's commitment to supporting cultural and linguistic diversity and community resilience. The "use it or lose it" clause ensures accountability and efficient spectrum use.

What licence duration would make most sense for your company/organisation?
Why?

A **20-year licence duration** would make the most sense for The National Pacific Media Trust.

- **Why:**

- **Long-term Planning and Investment:** Pacific media organisations require significant, long-term investment in broadcasting infrastructure, content creation (especially in multiple Pacific languages), and community engagement. A 20-year term provides the certainty needed to attract funding, plan multi-year projects, and amortise capital expenditures.
- **Cultural Preservation:** The work of language and cultural revitalisation is a generational undertaking. A longer licence duration allows for sustained, strategic efforts in this critical area, fostering intergenerational knowledge transfer and community cohesion.
- **Stability and Sustainability:** Frequent licence renewals (e.g., every 10 years) introduce instability and administrative burden, diverting resources away from core broadcasting activities. A 20-year term enhances the long-term sustainability of Pacific media.

11

What should be the difference in tenure for AM vs FM, if any?

The National Pacific Media Trust believes there should be **no difference in tenure for AM vs FM licences** for non-commercial broadcasters. Both AM and FM frequencies are vital for reaching diverse Pacific communities across New Zealand, especially in rural or geographically challenging areas where AM may provide better coverage. The public service mandate applies equally to both bands.

12

What duration of time of non-use would be appropriate for triggering the Crown's right to take back the licence?

For non-commercial licences, a duration of **12 to 18 months of continuous non-use** would be appropriate for triggering the Crown's right to take back the licence.

- **Considerations:**

- This period allows for unforeseen operational challenges, technical issues, or temporary funding gaps that might interrupt broadcasting, without immediately penalising a public service broadcaster.
- It should be coupled with a requirement for the licence holder to notify RSM of any extended periods of non-use and provide a clear plan for resuming broadcasting.

- Exceptions should be made for circumstances beyond the licensee's control, such as natural disasters, national emergencies or in the case of NPMT - the loss of an AM mast in Auckland due to the decommissioning of infrastructure by RNZ.

RNZ and Schedule 7 provisions in the Radio Communications Act

13

How do the sections of the Act advantage or disadvantage your business?

The sections of the Radio Communications Act 1989 that grant statutory entitlements to RNZ and Schedule 7 licensees for 20-year licences (Sections 174 and 170 respectively) currently **disadvantage** The National Pacific Media Trust and other non-Schedule 7 Pacific media organisations.

- **Disadvantage:** This creates an inequity where some public service broadcasters are guaranteed long-term certainty, while others, equally vital for cultural and community well-being, face potential shorter terms or greater uncertainty. This disparity hinders long-term planning, investment, and sustainability for Pacific media, which are crucial for our mission of language and cultural preservation.

14

How might the Crown provide fairness to all licence holders?

To provide fairness to all licence holders, particularly within the non-commercial sector, the Crown should:

- **Extend 20-year statutory entitlements to all recognised non-commercial public service broadcasters:** This would include Pacific media organisations that fulfil a clear public service mandate related to language, culture, and community information. This could be achieved through legislative amendment to the Radio Communications Act 1989.
- **Establish a clear, consistent policy framework for all non-commercial spectrum:** This framework should recognise the social and cultural value of non-commercial broadcasting and ensure equitable access, security of tenure, and freedom from resource charges for all eligible entities.

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?

Given the legislative barrier and the Crown's preference for 10-year licences, NPMT strongly prefers a **legislative** approach to address this issue.

- **Why Legislative:**

- **Certainty and Equity:** A legislative amendment provides the highest level of certainty and ensures equitable treatment across all non-commercial broadcasters. Operational changes alone may be subject to future policy shifts and do not address the fundamental inequity embedded in the Act.
- **Long-term Vision:** A legislative solution demonstrates a long-term commitment to supporting the diverse non-commercial broadcasting landscape, including Pacific media, which is essential for cultural preservation and community development.
- **Consistency:** It aligns the Act with the stated policy objectives of supporting non-commercial use and fostering diversity.

- **Proposed Legislative Option:**

- Amend the Radio Communications Act 1989 to extend the statutory entitlement for 20-year licences to a defined category of "Public Service Community and Cultural Broadcasters," which would explicitly include recognised Pacific media organisations. This would ensure that all entities serving a vital public service role receive the same long-term security as RNZ and Schedule 7 licensees.

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?

The National Pacific Media Trust advocates for the following changes to the reservation of spectrum for non-commercial use:

- **Explicit Reservation for Pacific Media:** A dedicated reservation of spectrum for Pacific media should be established, similar to that for iwi radio, community radio, and RNZ. This would acknowledge the unique and critical role of Pacific media in New Zealand's diverse cultural landscape, particularly in language revitalisation and cultural maintenance for the country's growing Pacific population.
- **Expansion of Existing Reservations:** The existing reservations for iwi radio, community radio, and RNZ should be maintained and, where necessary, expanded to meet current and future demand.
- **Flexibility within Non-Commercial Blocks:** While reserved blocks are important, there should be mechanisms to allow for flexible allocation within these blocks to accommodate the specific needs of different non-commercial groups (e.g., smaller frequencies for very localised community stations, or larger frequencies for regional Pacific networks).
- **Proactive Spectrum Management:** RSM, in collaboration with Te Puni Kōkiri, MCH, MPP and The National Pacific Media Trust, should proactively identify and make available suitable frequencies for non-commercial use, rather than relying solely on applications when spectrum becomes available.

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?

The National Pacific Media Trust offers the following recommendations regarding the continuation and modification of reservations in blocks 16-19:

- **Block 16 (National Public Radio - RNZ National):** This reservation should **continue** in its current form. RNZ's role as a national public broadcaster and lifeline utility is indispensable.
- **Block 17 (National Youth Network):** The current underutilisation of this block necessitates a re-evaluation of its allocation. Rather than being freed up for commercial use, The National Pacific Media Trust (NPMT) strongly advocates for this frequency to be **gifted to NPMT to enable NiuFM to transition from an Auckland-only youth FM broadcaster to a national youth FM broadcaster**. NiuFM brings 23 years of proven experience and expertise in youth broadcasting, having successfully engaged and served young Pacific audiences. This gifting would not only ensure the efficient use of this currently underutilised spectrum but also leverage NiuFM's established track record to deliver a much-needed national youth service, fostering cultural identity and language engagement on a broader scale.
- **Block 18 (National Māori Radio Network):** This reservation must **continue**. The fact that it has not been fully utilised as intended since 1999 highlights challenges in its implementation, not a lack of need. MBIE should work closely with Te Puni Kōkiri and Māori radio stakeholders to address the barriers to its full utilisation, potentially through revised policy settings, funding models, or operational support, rather than releasing it for commercial use. Its purpose of contributing to the protection and promotion of te reo me ngā tikanga Māori remains paramount.
- **Block 19 (Pacific Island Radio Network and commercial licences):** This block is currently used by National Pacific Media Trust and commercial entities. NPMT strongly advocates for the **continuation and strengthening of the reservation for Pacific Island Radio Network** within this block. Given the increasing Pacific population and the vital role of Pacific media in language and cultural maintenance, there may be a need to expand the dedicated portion for Pacific media within this block or ensure priority access for Pacific broadcasters.

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?

If unused spectrum from currently reserved blocks (e.g., Block 17) were to be released, the National Pacific Media Trust believes that **reassigning these licences to other non-commercial use would bring significantly greater benefits** to New Zealand society.

- **Benefits of Non-Commercial Reassignment:**
 - **Cultural and Linguistic Diversity:** Supports the growth and sustainability of media serving underrepresented communities, such as Pacific Islanders, contributing to language revitalisation and cultural preservation.
 - **Community Cohesion:** Provides platforms for local news, information, and community engagement that commercial media may not prioritise.
 - **Emergency Broadcasting:** Enhances resilience by providing additional channels for critical information dissemination during emergencies.
 - **Public Good:** The social and cultural returns on investment from non-commercial broadcasting far outweigh the financial returns from commercial use.
- **If Non-Commercial, to Whom?**
 - Priority should be given to **Pacific media organisations** (including The National Pacific Media Trust), iwi radio, and community radio groups that can demonstrate a clear public service mandate, a sustainable operational plan, and a proven ability to serve their target communities.
 - A transparent application process, assessed against criteria focused on public benefit, cultural impact, and community need, should be established.
- **If Commercial, How?**
 - While our preference is for non-commercial reassignment, if spectrum *must* be made available for commercial use, it should be done through a **transparent auction process** to ensure fair market value and efficient allocation. However, any such auction should explicitly consider the public interest and potential for negative impact on existing non-commercial services.

Impact of AM Transmission Infrastructure Decisions

The National Pacific Media Trust (NPMT) wishes to highlight the critical impact of decisions regarding AM transmission infrastructure, **particularly the proposed decommissioning of the AM Southern Mast in Henderson**, on our ability to utilise and exercise our rights to hold AM spectrum in Auckland for 531pi.

- **Essential Service for Pacific Communities:** The continued AM transmission of 531pi in Auckland is not merely preferred but absolutely essential for our community audience. Our core demographic consists of older Pacific individuals who rely heavily on AM broadcasting due to significantly lower adoption rates of online streaming and persistent barriers to affordable internet access. For this vital audience, transitioning away from the AM frequency is simply not a viable or equitable option.
- **Undermining Mandate and Rights:** Discontinuing access to an AM transmission tower, such as the Henderson mast, would abruptly end over 30 years of dedicated Pan-Pacific language terrestrial radio broadcasting in the Auckland region. This outcome would directly undermine the fundamental intent of the Broadcasting Act, RNZ's own charter, and NPMT's Trust Deed.

all of which are designed to ensure the provision of diverse and accessible broadcasting services.

- **Insistence on Dedicated Space and Concerns over Fees:** Therefore, NPMT must respectfully but firmly insist that a dedicated and exclusive space on an Auckland AM transmission tower(s) be preserved solely for 531pi.

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?

The National Pacific Media Trust agrees that comparing the original intent of Local Commercial FM (LCFM) licences with the current proposals is a reasonable approach to determine their continuation. This allows for an assessment of whether the original policy objectives are still being met and if the category remains relevant in the evolving media landscape.

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.

The National Pacific Media Trust prefers **the proposal outlined** for LCFM licences, which offers the remaining six operators the choice between transitioning to a full commercial licence or a community licence.

- **Why:**

- **Clarity and Consistency:** This proposal brings clarity to the LCFM category, which has seen declining numbers and may no longer serve its original purpose effectively in the current market. It aligns these licences with either a purely commercial or purely non-commercial framework.
- **Fairness:** It addresses the potential unfairness of providing discounted spectrum indefinitely without the expectation of full market participation or a clear public service commitment.
- **Potential for Non-Commercial Growth:** If LCFM operators choose to transition to community licences, this could potentially strengthen the non-commercial sector and provide more localised content, which aligns with NPMT's broader objectives.

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?

As NPMT supports the proposed transition of LCFM licences, this question is less directly relevant. However, if the status quo were to be maintained, the price calculation for LCFM licences would need to carefully balance their commercial potential with the burden of strict content provisions. This would likely require a more nuanced approach than a simple per-capita model, potentially incorporating:

- **Discount Factor for Content Provisions:** A significant discount factor applied to the commercial per-capita rate to reflect the revenue limitations imposed by strict content requirements (e.g., advertising limits, local content quotas).
- **Performance-Based Pricing:** A tiered pricing model where the discount is linked to the actual adherence to and demonstrable impact of the content provisions.
- **Regular Review:** A mechanism for regular review of the pricing model to ensure it remains fair and relevant as market conditions and content requirements evolve.

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

If the proposal outlined for LCFM licences is to progress, April 2031 should provide **sufficient time for transition**, provided that:

- **Clear Guidance and Support:** MBIE provides clear, timely, and comprehensive guidance to the affected LCFM operators regarding the transition process, including the implications of choosing either a commercial or community licence.
- **Early Engagement:** Proactive engagement with the six remaining LCFM operators begins immediately to understand their individual circumstances and assist them in making informed decisions.
- **Streamlined Processes:** The administrative processes for transitioning licences are streamlined and efficient, minimising bureaucratic hurdles.
- The 5-year lead time from the proposed moratorium date (April 2026) to the expiry in April 2031 offers a reasonable window for operators to adapt their business models, secure new funding (if transitioning to community), or adjust their operations.

Closing comments

Are there any other comments you wish to make?

The National Pacific Media Trust wishes to reiterate the profound importance of AM/FM radio spectrum for Pacific communities in New Zealand. For many, radio remains a primary source of information, entertainment, and a vital link to their language and culture, especially for older generations and those with limited access to digital platforms.

Our submission emphasises the following key points:

1. **Prioritise Non-Commercial Spectrum:** The allocation process must explicitly recognise and prioritise the social, cultural, and community value of non-commercial broadcasting over purely commercial returns.
2. **Equitable Treatment and Long-Term Certainty:** All non-commercial public service broadcasters, including Pacific media, should receive equitable treatment, ideally with 20-year licence durations and freedom from resource charges, to ensure stability and enable long-term planning for cultural preservation and community service. Legislative amendments are preferred to achieve this.
3. **Dedicated Pacific Media Spectrum:** The establishment of an explicit reservation of spectrum for Pacific media is crucial to support the growth and sustainability of broadcasting in Pacific languages and cultures.
4. **Proactive Spectrum Management:** RSM should proactively manage and allocate non-commercial spectrum in collaboration with relevant cultural and community organisations.
5. **Leveraging Existing Youth Broadcasting Expertise:** The gifting of the currently underutilised National Youth Network frequency to NPMT would enable NiuFM to expand its 23 years of successful youth broadcasting

experience to a national scale, ensuring efficient spectrum use and fostering cultural identity and language engagement for young people across New Zealand.

6. **Emergency Role:** The critical role of Pacific media as trusted information sources during emergencies must be acknowledged and supported through spectrum allocation policies.
7. **Critical Infrastructure for AM Broadcasting:** The continued availability of suitable and affordable AM transmission infrastructure, such as the Henderson mast, is paramount for NPMT's ability to operate 531pi and fulfil its mandated service to Pacific communities in Auckland. Decisions regarding infrastructure must consider the unique needs and vulnerabilities of non-commercial broadcasters and their audiences.

We appreciate the opportunity to provide feedback on this important discussion document. The decisions made regarding AM/FM radio spectrum will have a lasting impact on the cultural fabric and community well-being of New Zealand. We look forward to continued engagement with the Ministry of Business, Innovation and Employment to ensure an outcome that serves all New Zealanders.