

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

## Your name and organisation

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Organisation	Apna Networks Ltd T/A Radio Apna 990AM

## 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?
	No.

### 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?
	Exception could be made on a case to case basis depending on the difficulties faced by businesses.

### Proposed policy objectives for the allocation process

3	What amendments, if any, would you make to the proposed objectives and criteria?
4	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?
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Approach A. The market is currently in a difficult position and creating a competitive approach would put more pressure on existing broadcasters.

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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.

### Price formula

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

Due to the hard economic conditions, the issues with pricing at this stage is that many broadcasters will face difficulty in paying huge lump sums, there will be cash flow issues in this circumstance. Therefore, it would be very difficult for broadcasters like us to source funding to pay this cost. We believe that the renewal cost should be waived to support the media industry.

### Duration of licences

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Which of the two options do you prefer and why?

20 years. As it gives certainty to the broadcasters.

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

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

20 years so that we can get a sense of certainty and stability. We believe that there is a market for AM audience and our audience base is loyal to traditional media.

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

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

5 years.

### **RNZ and Schedule 7 provisions in the Radiocommunications Act**

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

**14** How might the Crown provide fairness to all licence holders?

**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?

### **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?

### **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?

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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?

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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?

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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.

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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?

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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 are requesting for a renewal of the licence on the basis that the fees be waived due to market conditions so that broadcasters can allocate future cash flow to enhancing

the services provided to their audience. It is no surprise that the media industry is facing a lot of hurdles and any help would be appreciated by all broadcasters in this instance.

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