

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

Name	Natalie Robb
Organisation	Radio Hawke's Bay

### 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?
	N/A

#### 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?
	N/A

#### Proposed policy objectives for the allocation process

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

## Approach to pricing commercial licences

5	Which is your preferred approach and why?
	N/A
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.
	N/A

## Price formula

7	Do you agree with the assumptions outlined to calculate a price offer? Why? Why not?
	N/A

## Duration of licences

8	Which of the two options do you prefer and why?
	While as an access radio station a twenty-year license is preferable the right for the Crown to be able to take unused frequencies and reallocate them would be useful in some regions.
9	Is there another option that should be considered? What would this be and why?
10	What licence duration would make most sense for your company/organisation? Why?
	A twenty-year license gives Radio Hawke's Bay the surety that we can continue transmitting a service on AM and FM for the whole community.
11	What should be the difference in tenure for AM vs FM, if any?
	No difference in tenure unless there is a decision on the future of AM. Radio Hawke's Bay have proven that with a rural population in an emergency weather event AM is a lifeline.

12	What duration of time of non-use would be appropriate for triggering the Crown's right to take back the licence?
	3 years. This would allow the owner to either try and sell the license or raise funds to broadcast. At the 3-year threshold the license would be forfeit to the Crown.

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

13	How do the sections of the Act advantage or disadvantage your business?
	This is vital to the community lifelines that are provided by community access media, RNZ and Iwi Radio.
14	How might the Crown provide fairness to all licence holders?
	As we operate as a non-commercial model and rely on funding to operate all licensing needs to be at minimal or no cost.
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?
	For our station the preference is to have a longer licensing term to ensure the continuation of access media and protection to public interest broadcasting for generations to come.

## **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?
	These should be reserved in each region to represent the populations.

## **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?

More non-commercial licenses in areas not yet covered by access media such as Gisborne. This would enable the regions to have robust radio coverage especially in emergencies that are occurring more frequently.

### Local Commercial FM licences

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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?

As I work in Community Access Radio I did not feel I could comment on commercial radio and fee structure. I would like to add that anything that could assist in keeping radio relevant across New Zealand would be welcomed by all concerned.