

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

Your name and organisation

Name	Ane Ponifasio
Organisation	Samoa Multimedia Group Ltd / Radio Samoa1593 AM

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 Comment

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?
	No feedback

Proposed policy objectives for the allocation process

3	What amendments, if any, would you make to the proposed objectives and criteria?
	The prizing offer A based on previous market prizes does not reflect Radio Samoa's true listening demographic. It doesn't work for us. As long as it reflects Radio Samoa's actual listening audience and based on .04 cents per Samoan listeners not per capital. B & C option won't work for us, to adopt the B approach it could potentially result in lower value of spectrum license. There is a risk and uncertainty that another operator could value the spectrum more than what we are currently paying under the prize offer formular.
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?

Please see 4 we prefer prize offer A subject to actual Samoan listenership being the correct Samoan / ethnic demographic.

Radio Samoa's listening demographic is very different from the commercial broadcaster. This should reflect our actual listening base, we see this to be fair for Radio Samoa as we will not be able to afford nor should be lumped in with the non ethnic national capital prizes for commercial radios. One size approach doesn't fit all.

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 do not agree with prizes outlined. Getting the demographics right for Radio Samoa needs to apply: eg, Census, relevant studies to indicate where clusters of Samoan population is in Auckland and nationwide etc.

Price formula

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

We agree with the assumptions but subject to the application of the prizing against a correct and true listening demographic for Radio Samoa 1593am and not for general public.

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?

No comment

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 we are not FM broadcasters.
12	What duration of time of non-use would be appropriate for triggering the Crown's right to take back the licence?
	No Comment

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?

No comment

Closing comments

Are there any other comments you wish to make?

We are opting for pricing approach subject to a correct and accurate demographic representing Samoan population listeners and not the general population.