

1. 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).

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

### Your name and organisation

Name	Luke Weston
Organisation	Rhema Media

### 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?

Rhema Media supports the principle of responsible spectrum management and agrees that eligibility should generally be restricted to those with no outstanding fees.

#### 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?

A moratorium provides stability for planning. However, Rhema Media operates a national network (Rhema, Life FM, Sanctuary) and sometimes needs to make technical changes to maintain service continuity, especially after natural disasters or for compliance with new safety standards. Exceptions should be allowed for modifications necessary to restore or maintain essential services, address emergencies, or meet legal requirements.

#### Proposed policy objectives for the allocation process

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

The objectives should explicitly acknowledge the value of faith-based and community broadcasters. Rhema Media has served New Zealand for nearly 50 years, providing hope, support, and practical help—especially during crises. Criteria should ensure ongoing access for non-commercial broadcasters with a proven record of community service, such as Rhema Media.

4

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

- Prioritising broadcasters who provide public benefit, such as niche community groups and spiritual support.
- Recognising the unique role of faith-based media in fostering social cohesion and well-being.

### Approach to pricing commercial licences

5

Which is your preferred approach and why?

Rhema Media prefers a tiered pricing model that considers station size, reach, and not-for-profit status. As a charitable organisation, our revenue is reinvested into service, not profit. A one-size-fits-all commercial pricing model would threaten our ability to serve communities nationwide, especially in smaller regions.

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.

No

### Price formula

7

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

We are concerned that the current assumptions may not fully account for the public benefit provided by organisations like Rhema Media. Our mission is to serve, not to generate profit, and our funding comes largely from donations (85%). The price formula should reflect these realities to ensure we can continue providing vital services across New Zealand.

### Duration of licences

8

Which of the two options do you prefer and why?

A longer licence duration (20 years) is preferred. This would provide Rhema Media with the certainty needed for long-term planning and investment in infrastructure, technology, and staff. It would also enable us to continue innovating and expanding our reach, as we have done over the past four decades.

9	Is there another option that should be considered? What would this be and why?
	No
10	What licence duration would make most sense for your company/organisation? Why?
	A 20-year licence best suits Rhema Media, allowing us to plan for major investments-such as upgrading transmission sites or launching new services-while maintaining stability for our staff and audience.
11	What should be the difference in tenure for AM vs FM, if any?
	AM broadcasting remains important for reaching rural and older audiences. Longer or more flexible terms for AM licences would help us maintain these services, especially as FM and digital options expand.
12	What duration of time of non-use would be appropriate for triggering the Crown's right to take back the licence?
	A period of 12–24 months of non-use would be reasonable, giving organisations time to recover from setbacks or make necessary technical upgrades without risking immediate loss of spectrum.

## RNZ and Schedule 7 provisions in the Radiocommunications Act

13	How do the sections of the Act advantage or disadvantage your business?
	Provisions that favour RNZ or other entities can disadvantage Rhema Media, as we do not receive the same legislative protections or funding. This makes it harder for us to plan long-term and compete for spectrum, despite our significant public service role.
14	How might the Crown provide fairness to all licence holders?
	Fairness could be achieved by ensuring transparent, consistent processes for all licence holders, and by recognising the unique contributions of not-for-profit and faith-based broadcasters like Rhema Media.
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?
	We prefer a legislative solution to provide long-term certainty. Operational workarounds may create unnecessary complexity and uncertainty, which is challenging for a mission-driven organisation like Rhema Media.

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

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

Reservations should be maintained and, if possible, expanded to include faith-based broadcasters. Rhema Media has a proven record of providing essential spiritual and practical support to New Zealanders, especially in times of crisis.

### 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?

Yes, these reservations should continue. Periodic review would ensure that allocations reflect current demand and community needs, including those of faith-based broadcasters like Rhema Media.

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?

Unused spectrum should first be offered to non-commercial and community broadcasters, including faith-based organisations. This maximises public benefit and strengthens media diversity. If commercial allocation is necessary, it should be done transparently and fairly.

### 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?

Yes, but assessment should also consider current community needs and the evolving media landscape. Rhema Media's experience shows that local content remains vital for building community connection and resilience.

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.

Maintaining the status quo is preferred. It supports local content and diversity at a sustainable price, which is essential for not-for-profit broadcasters like Rhema Media to serve their communities.

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?

A reduced fee that reflects the public benefit and content obligations is appropriate. For Rhema Media, this would acknowledge our commitment to serving the public good rather than maximising revenue.

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

Transition by April 2031 is possible if decisions are made promptly and clear guidance is provided. Delays could impact our ability to plan and serve our audience effectively.

## Closing comments

Are there any other comments you wish to make?

For nearly half a century, Rhema Media has been a cornerstone of New Zealand's media landscape, providing a trusted Christian voice that reaches hundreds of thousands of people every week through our national radio networks, television, and print publications. Our legacy is built on a commitment to drawing New Zealanders into a meaningful relationship with Jesus Christ, offering hope, encouragement, and practical support to individuals and families from all walks of life.

Throughout times of national crisis, social change, and everyday life, Rhema Media has stood alongside communities—broadcasting messages of faith, comfort, and resilience. We have been there during natural disasters, providing vital information and spiritual reassurance. We have championed values of compassion, unity, and service, helping to foster a sense of belonging and community connection across the country.

Our ability to continue this mission relies fundamentally on secure access to the radio spectrum. The spectrum is not just a technical resource; it is the lifeline that enables us to reach listeners in every region, from the largest cities to the most remote rural areas. Losing or restricting access to our broadcast frequencies would severely undermine our capacity to serve New Zealanders, particularly those who rely on free- to-air radio for connection, information, and spiritual support.

As a for-purpose organisation, Rhema Media relies on both Schedule 7 and commercial broadcasting licences to reach and serve our communities. However, our operational model is significantly constrained by regulatory limits on the amount of advertising we can broadcast per hour. These restrictions directly impact our ability to increase advertising revenues, which are essential for sustaining and expanding our services. Unlike purely commercial broadcasters, our dual reliance on these licences means we must carefully balance our mission-driven objectives with the realities of financial sustainability under these operational limits.

In fulfilling our commitment to serve the community, Rhema Media uniquely addresses the needs of New Zealanders who identify with the Christian faith—a substantial and enduring segment of the population (32%). As the only radio

broadcaster dedicated to this community, we play a vital role in providing content that supports their values, beliefs, and sense of belonging. Our service is not only a matter of cultural and spiritual significance but also fills a gap in the media landscape, ensuring that the Christian community continues to have a dedicated voice and platform.

It is crucial that future spectrum policy recognises the unique and vital public service role that faith-based and community broadcasters like Rhema Media play. Unlike commercial operators, our mandate is not profit but public good—delivering content that uplifts, informs, and strengthens the social fabric of Aotearoa. We urge the Crown to ensure that spectrum allocation frameworks continue to support organisations with a proven legacy of service, so that Rhema Media can remain a beacon of hope and unity for generations to come.

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