

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

Your name and organisation

Name	Hylton Read
Organisation	Shureview Radio and TV Servicing Ltd

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?
	Holders of a licence should be eligible to renew unrestricted.

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?
	April 2026 is about right. The renewal fee to be paid by April 2031. AM-FM should be able to apply for a change of transmission site, and change of HRP.

Proposed policy objectives for the allocation process

3	What amendments, if any, would you make to the proposed objectives and criteria?
	Support continued use of the spectrum by AM and FM users.
4	Are there other objectives or criteria you would propose? If so, what are these?
	Low Power FM all to be licensed. (At present needs to be controlled)

Approach to pricing commercial licences

5	Which is your preferred approach and why?
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A Price offer

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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.

No

Price formula

7

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

Yes

Duration of licences

8

Which of the two options do you prefer and why?

20 year licence

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?

20 Year licence. 20 years is a more secure tenure for the capital involved.

11

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

FM/AM should have the same tenure 20 years

12

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

5 years before return of Licence

RNZ and Schedule 7 provisions in the Radiocommunications Act

13	How do the sections of the Act advantage or disadvantage your business?
	The ACT does not advantage or disadvantage our business.
14	How might the Crown provide fairness to all licence holders?
	No change needed as things are fair now
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?
	The options should be developed operationally not by legislation.

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?
	Things should stay as they are with no change.

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?
	Things in 17 should be changed and put in block 19. (There is a growing need for various ethnic groups in NZ to broadcast)
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?

Limited commercial use. Similar to IWI.

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?

Keep LCFM as is.

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.

Keep the status quo.

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?

20% of a commercial Licence.

22

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

There should be enough time to transmission to April 2023

Closing comments

Are there any other comments you wish to make?

No