

Te Nehenehenui Submission

AM/FM Radio Spectrum: 2031 Expiry of Licences and Potential Reassignment

Your name and organisation

Name	Samuel Mikaere (Tumu Whakarae: Group Chief Executive)
Organisation	Te Nehenehenui - The post settlement governance entity of Ngāti Maniapoto and License Holder of Maniapoto FM and Waihikurangi Trust is the charitable arm and trustee of Maniapoto FM (the platform).

General questions

Eligibility criteria for renewal

1	<p>Should the Crown restrict eligibility to those with no outstanding fees? Should there be any exceptions to this?</p> <p>Te Nehenehenui agree that licences should have restrictions. The restrictions should be proportionate, fair, and context-sensitive to the licence holder. In practice, this means consideration of and availability of exceptions. For example, non-commercial broadcasters may need extra time due to funding delays or unexpected costs. If a broadcaster has a strong track record and is working to resolve their payments, they should still be considered for renewal. This helps protect access for Iwi/Māori broadcasters, who serve their communities but face different financial challenges than commercial operators.</p>
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Moratorium prior to the rights expiry

2	<p>Please provide any feedback you have on the proposed moratorium date. In what circumstances should an exception to the moratorium on modifications be allowed?</p> <p>Te Nehenehenui support a freeze on new commercial licences from 2 April 2026; however, we believe non-commercial broadcasters should be excluded from this rule. Non-commercial licenses operate under different governance models and must stay flexible to serve the changing needs of our communities. There should be room for exceptions — especially when upgrades are needed, emergencies arise, or changes are made that relate to Te Tiriti o Waitangi.</p>
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Proposed policy objectives for the allocation process

3	<p>What amendments, if any, would you make to the proposed objectives and criteria?</p> <p>Te Nehenehenui recommend explicit inclusion of Treaty of Waitangi obligations and recognition of iwi-led broadcasting as a taonga. This means recognising iwi licence holders as a partner in spectrum management. The objectives should prioritise language revitalisation, cultural transmission, and equitable access for iwi Māori.</p>
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4	Are there other objectives or criteria you would propose? If so, what are these?
	Te Nehenehenui recommend that the proposed policy framework be strengthened by incorporating explicit Māori perspectives, not just consideration of. The Spectrum allocation should support iwi development strategies by specifically looking to protect and preserve iwi and māori broadcasting. The criteria should include demonstrated community engagement, te reo Māori programming, and governance by iwi Māori entities as a vital vehicle that moves beyond access to protection, development and investment in iwi radio

Approach to pricing commercial licences

5	Which is your preferred approach and why?
	Te Nehenehenui support a tiered pricing model that distinguishes between commercial and non-commercial use. Non-commercial should be offered reserved licences with minimal fees, reflecting our public good role and Treaty-based status.
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.
	Te Nehenehenui propose a kaupapa Māori pricing framework for iwi broadcasters, co-designed with iwi and Crown agencies. This would assess value, based on cultural outcomes, not market revenue. A dual value lens on culture and commercial reinforces the potential for Māori enterprise, innovation and cultural and intergenerational opportunity.

Price formula

7	Do you agree with the assumptions outlined to calculate a price offer? Why? Why not?
	Te Nehenehenui don't fully agree with assumptions. We recommend a separate formula for Iwi/Māori licences. The current assumptions prioritise market value over cultural equity. For iwi radio, pricing should reflect our role in revitalising te reo Māori, not commercial metrics. We advocate to propose affordable pricing or reserved licenses with minimal fees.

Duration of licences

8	Which of the two options do you prefer and why?
	The preferred Te Nehenehenui option is to maintain our existing longstanding access to the reservation of spectrum, beyond 2031. This provides certainty and aligns with future-proofing our long-term iwi strategies and reflects the inter-generational focus of iwi organisations.
9	Is there another option that should be considered? What would this be and why?
	A renewable licence of 20-35 year-model for all Iwi Radio. Include 10-year reviews, on continued iwi governance and cultural programming. This balances stability with accountability.
10	What licence duration would make most sense for your company/organisation? Why?



A 40-year longstanding term would best support our strategic planning, infrastructure investment, and intergenerational language revitalisation goals for Maniapoto FM.

11	What should be the difference in tenure for AM vs FM, if any?
	Te Nehenehenui recommend equal tenure for AM and FM licences held by iwi/Māori broadcasters. Both serve distinct audiences and are vital to iwi strategies.
12	What duration of time of non-use would be appropriate for triggering the Crown's right to take back the licence?
	We advocate that any unused national frequencies, be afforded to tangata whenua.

RNZ and Schedule 7 provisions in the Radiocommunications Act

13	How do the sections of the Act advantage or disadvantage your business?
	Schedule 7 provides certainty for RNZ and some iwi radio stations. However, this excludes and disadvantages many iwi radio broadcasters like Maniapoto FM. The lack of equivalent provisions and uneven conditions for Maniapoto FM that currently operate under commercial terms, despite Maniapoto FM is non-commercial and community focused.
14	How might the Crown provide fairness to all licence holders?
	Te Nehenehenui advocate for the Crown to extend Schedule 7 protections to all iwi broadcasters with proven community impact and iwi governance. This would uphold equity and Treaty principles by integrating commercial opportunities, that directly benefit tangata whenua
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?
	Te Nehenehenui prefer legislative amendments to enable longer terms for Iwi Radio licences. Operational works risk inconsistency and do not reflect the enduring nature of Māori kaupapa ā-iwi.

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?
	Te Nehenehenui advocate for permanent reservation of spectrum for iwi radio, with expanded blocks to reflect growing demand. RNZ and community radio should retain access, but iwi/Māori must be prioritised first.

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?
	Blocks should continue in their current form, with additional blocks reserved for Iwi Radio use, which will ensure continuity and recognised unmet demand.

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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?

Unused spectrum should be offered to iwi/Māori broadcasters first allowing outcomes to integrate commercial opportunities that directly benefit mana whenua. If reassigned commercially, a portion of revenue should support non-commercial iwi media initiatives.

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?

Te Nehenehenui support reassessing Local Commercial FM licences to ensure they align with their original intent. Iwi-led Local Commercial FM stations should be acknowledged for distinct characteristics and responsibilities that distinguish them from local commercial operators.

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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.

Te Nehenehenui prefer maintaining the status quo with strict content conditions and reduced fees, especially for iwi-led Local Commercial FM stations. This supports community access and cultural programming.

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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?

Pricing should reflect the public good value of content, with discounts for Iwi Radio stations delivering te reo Māori, iwi news, and cultural programming.

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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?

April 2031 is achievable if iwi broadcasters are engaged early and supported through technical and policy transitions.

Closing Comments

Are there any other comments you wish to make?

This submission has been prepared to meet our needs as a non-commercial operator and iwi kāinga of our listenership coverage.

Te Reo Irirangi o Maniapoto (Maniapoto FM) was founded by Te Pare Joseph, Waka Coffin, Ngaamo Thompson and Hotu Taane and established by deed on the 6th of August 1990 as an on-air voice for Ngāti Maniapoto to future proof te reo o Maniapoto. From 1990 to June 2022, our iwi pre-settlement governance entity and predecessor, Maniapoto Māori Trust Board was the License holder.

In July 2022, Te Nehenehenui Trust, the post settlement governance entity of Ngāti Maniapoto, agreed to acquire and incorporate Maniapoto FM into Waihikurangi Trust, which is the charitable arm and trustee of Maniapoto FM (the platform).

Since 1990, Maniapoto FM continues to be ‘te reo o te iwi (the voice of the people)’ broadcasting our iwi narratives, a mix of live and pre-recorded bilingual shows, designed to focus on our targeted audience of receptive and fluent iwi members of te reo Māori, within our on-air footprint area of Maniapoto and global via our online platforms.

The broadcast area of Maniapoto FM includes Taranaki, Raukawa, Waikato and Hauraki. We have four satellites located in Te Kūiti, Maniāiti/Benneydale, and Piopio and Maniapoto FM has a broadcast reach of 250,000 listeners.

As a non-commercial operator, we understand that ...

‘The Crown has reserved some radio frequencies, for the use of iwi/Māori since the commencement of the Radiocommunications Act 1989. This commitment is longstanding and a pillar of the Crown’s Treaty of Waitangi responsibility to protect and promote te reo Māori and tikanga Māori (the Māori language and culture) as a taonga of the Māori people and to support Iwi / Māori in their language revitalisation endeavours.’ⁱ

ⁱ Pg.17, 5.1 Iwi Radio: AM/FM radio spectrum: 2031 expiry of licences and potential reassignment Discussion document
8 May 2025