



AM/FM Radio Spectrum Submission: 2031 expiry of licenses and potential reassignment

July 2025

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1 Introduction

1. Waitangi Tribunal WAI 11 ruled that Māori language is a taonga under Article II of Te Tiriti, and that the Crown has a duty to protect and nurture it actively. This led to the allocation of initial AM frequencies.
2. The allocation of AM/FM frequencies to iwi has played a crucial role in revitalising AM/FM in Te Reo Māori and Te Ao Māori. Since the first iwi radio allocation to Te Upoko o te Ika in Wellington in 1987, AM/FM allocations have helped iwi radio become stronger.
3. The 1990 Waitangi Tribunal report on Māori broadcasting established the foundation for the government to officially assign AM and FM licences to Māori broadcasters. Consequently, there are now 21 iwi radio stations available.
4. Tū Ātea does not currently hold any AM/FM licences; however, as a Māori organisation with extensive spectrum knowledge, we are interested in supporting Māori interests during this consultation process.
5. Our response primarily addresses two issues;
 - Importance of AM/FM radio stations for Māori
 - Addressing uncertainty in the radio industry, particularly from a Māori perspective.

2 Significance of AM/FM Radio Stations for Māori

2.1 The role of Iwi Radio in revitalising Te Reo Māori and maintaining its connection to Te Ao Māori.

6. Studies and surveys show that iwi radios have a substantial and regular audience, playing a vital role in revitalising Te Reo Māori and strengthening Māori connections.
7. A 2024 report by Verian, Irirangi Te Motu, NZ On Air, and Te Māngai Pāho found that 53% of Māori consume media through Radio¹. This percentage rises to 74% among Māori aged 60 and over.
8. In the 15+ Māori age group, 14% listen to iwi radio at least weekly, and 7% tune in daily^{Error! Bookmark not defined.}. Within the Toa segment (high te reo proficiency), 39% listen weekly and 12% listen daily. The data indicates that a core group engages regularly with iwi radio.
9. A 2019 article explored how iwi radio stations act as cultural anchors, maintaining Te Ao Māori and engaging with digital convergence. The article emphasised how Iwi Radio functions as cultural custodians within the media landscape.
10. The 2019 Kantar report commissioned by Te Māngai Pāho, “ZePA Model Segmentation 2019,” showed that the listenership habits²:
 - Approximately 80% of iwi radio listeners access via traditional radio, around 40% via the internet, and about 21% via both.
 - High satisfaction: 55% rated iwi radio programming as “very satisfied” (5/5), while 32% rated it as “3”.

Provides clear evidence that culturally active and fluent speakers engage extensively and place great importance on the content.

¹ Verian, Irirangi Te Motu, NZ On Air and Te Māngai Pāho, “Where are the Māori audiences? - Māori audience quantitative report”, June 2024

² Kantar “ZePA Model Segmentation 2019” October 2019.

11. Although there are no recent surveys specifically assessing radio's linguistic influence, iwi radio continues to be widely acknowledged by Māori scholars and communities as a daily reinforcement of te reo and Te Ao Māori.
12. In 2024, Te Māngai Pāho reaffirmed that iwi radio is a vital element in supporting the transition of Māori from passive awareness to fluent language use.

2.2 The importance of radio for Māori living in rural areas

13. Approximately 25-30% of Māori live in rural areas. In comparison, 20% of NZ Europeans, 7% of Pacific peoples, and 5% of Asians live rurally. Furthermore, about a third (32%) of those residing in the most remote regions of Aotearoa, New Zealand, are Māori.
14. Many rural areas have limited or unreliable broadband and mobile coverage. This issue is even more evident in the most remote locations. Rural communities cannot rely on online or streaming services. Conversely, AM/FM radio remains reachable even in the most isolated spots.
15. Iwi radio plays a crucial role for rural Māori. Iwi radio stations broadcast in Te Reo and reflect local tribal perspectives, news, and values. This assists rural Māori in preserving language, culture, and identity, especially among kaumātua.
16. Radio is a vital communication channel during natural disasters (e.g., floods, earthquakes, power outages). Civil Defence relies on AM/FM and TV broadcasts to deliver urgent updates to isolated communities.
17. Radio, in particular, helps reduce social isolation by providing daily broadcasts of familiar voices, music, local news, and talkback that foster a sense of connection.
18. Rural populations tend to be older on average, with radio and TV remaining their preferred and most trusted sources of media. Many older Māori (and non-Māori) households still depend on traditional media rather than smartphones or apps.
19. This emphasises the significance of AM/FM radio in rural communities, especially for Māori.

2.3 Broadband penetration among Māori is lower, increasing reliance on radio.

20. Māori households are roughly 16% less likely than non-Māori to have home internet access.
21. Research by Digital Govt NZ highlights key challenges faced by Māori in adopting broadband, with the cost of internet and devices identified as the main barriers. The study also found that skills training and trusted local support (e.g., through marae) are crucial for broadband adoption³.
22. Government initiatives, such as the Rural Broadband Initiative 2 (RBI2) and Connected Marae, aim to improve broadband access in rural and marae areas; however, data on Māori uptake remains limited. A significant digital divide persists for Māori, both nationally and particularly in rural regions⁴.
23. Due to this, radio and television continue to be essential for Māori in maintaining cultural ties, entertainment, and access to information.
24. In summary, several key factors highlight the significance of AM/FM stations to the Māori population.
 - Iwi radio continues to play a vital role in the revival and propagation of Te Reo and Te Ao Māori.
 - A significant proportion of Māori depend on radio for cultural connection, entertainment, and access to information.

³ <https://www.digital.govt.nz/dmsdocument/177~report-digital-inclusion-user-insights-maori/html>

⁴ <https://www.stats.govt.nz/assets/Uploads/2023-Census-Your-Place-Your-Data-Online-session-presentation.pdf>

- Māori tend to live more rurally, and they are disproportionately represented among the older rural population, making radio a key tool for them.
 - Broadband penetration among Māori remains lower, emphasising the importance of radio even more.
25. This demonstrates that Iwi Radio holds importance for Māori.
 26. With over six years remaining until the AM/FM licences expire, it is difficult to predict the future of iwi radio beyond November 2031, especially given the current uncertainties in the radio industry.
 27. Unlike commercial radios, the effectiveness of iwi radios should be assessed by the impact they have on Māori communities and the role they play in conserving Te Reo and Te Ao Māori.
 28. In this context, the iwi radios must retain the option to operate past November 2031.

3. Keeping Options Open Amid Radio Broadcast Industry Uncertainty

3.1 Declining Listenership

29. AM/FM only listenership has been falling over the years. RNZ's data shows the broadcast audience declining from about 700k in 2020 to roughly 530k in 2024.
30. However, the audience for AM/FM radio in Aotearoa New Zealand and around the world is expected to remain steady or decline marginally in the coming years, with a growing shift towards digital formats.
31. The general expectation is that AM/FM, especially FM, will continue to operate beyond 2031. However, there is no consensus on how long traditional radio stations will remain in service.
32. On the financial side, radio stations in Aotearoa New Zealand are profitable, putting them in a favourable position (at least for now). However, they face several challenges and uncertainties, which cause volatility in the industry.
33. While iwi radio stations focus on serving their Māori stakeholders, they share transmission towers and other infrastructure with different radio stations. Uncertainty in the industry creates challenges for iwi radio stations on multiple fronts, including:
 - Potential for increasing costs
 - Uncertainty about continued access to infrastructure
 - Access to service providers and technical expertise.
 - A substantial decrease in available funding

3.2 Digital strategy is online

34. Currently, MBIE is not consulting on whether digital audio broadcasting is included in the decision. The digital options available are:
 - DAB/DAB+ operates in the VHF band 174–240 MHz.
 - HD Radio functions within the FM spectrum.
35. The industry has carried out several trials; however, there is no consensus on the standard to be adopted.
36. This is due to the lack of consensus on the standard to be adopted. It is also uncertain whether radio operators are willing to implement new technology amid industry uncertainty. The industry will probably adopt an 'online' approach as its digital strategy, rather than launching a digital broadcast service.

37. Without a clear strategy or plan, the number of radio stations collocated on transmission towers will decline over time.
38. Any certainty offered by MBIE will be advantageous for their continued service to stakeholders.

3.3 The cost of collocation could rise significantly

39. Most Iwi Radio stations share physical tower sites with other broadcasters, as leasing tower space is far more cost-effective than constructing standalone masts.
40. With decreasing audiences in broadcast radio and more stations moving online, likely, other stations will eventually relinquish traditional broadcasting.
41. With many of the towers built between the 1960s and 1980s, some of these structures are likely to need increased repairs and maintenance due to their age. Some may also require reinforcement or replacement depending on their condition.
42. With declining tenancy and rising costs, existing radio tenants are likely to share the expenses, thereby increasing the cost of collocating for all remaining operators.
43. This is likely to cause considerable uncertainty for iwi radio stations on various fronts:
 - Potential for an increase in cost
 - Uncertainty around continued access to infrastructure
 - Access to suppliers of service and technical know-how.

3.4 No designated funding for transmission within infrastructure

44. Current Te Māngai Pāho funding provides annual operational and infrastructure support, along with targeted capital injections for technical enhancements. Additionally, there are contestable content grants and broader Māori/regional funding pools to help maintain and grow their broadcast capabilities.
45. There is no explicit funding solely for co-locating on commercial transmission masts. Therefore, any increase in collocation costs must be covered by existing funding.
46. Radio stations can allocate parts of their contestable funding towards necessary transmission infrastructure costs if these are justified as essential for delivering their broadcasts.
47. Given the likelihood of rising tower costs, it is important that funding is provided so iwi radio stations do not have to compromise their programming to cover transmission expenses.

3.5 Recent industry developments are not encouraging

48. The recent Radio New Zealand mast replacement in West Auckland exemplifies what could happen in the future. Radio New Zealand is replacing two ageing AM transmission masts with a single one, mainly due to safety concerns, age, and cost factors (these masts are approximately 70 and 90 years old).
49. Radio New Zealand's second mast was dependent on current tenants paying increased access fees.
50. Overall, there was discontent among those located on Radio New Zealand towers due to concerns over costs and coverage obligations.
51. The Radio Broadcasters Association is considering legal action, citing concerns about charter compliance and Radio New Zealand benefiting from infrastructure without fair cost-sharing.
52. This highlight indicates potential cost and access uncertainties iwi radio stations might encounter in the future (there are two iwi AM frequencies on the Radio New Zealand West Auckland masts).
53. These problems must be tackled if iwi radio stations are to keep serving their stakeholders.
54. To reiterate, Iwi radios encounter substantial uncertainty.
 - Significant cost rises exceeding 10% year-on-year.

- Funding cuts of at least 15% compared to the previous fiscal year. In this context, addressing only frequency access is unlikely to provide the certainty the iwi radio stations need to continue serving their stakeholders.

4 Recommendations – Next Steps

55. The government must address the *broader challenges* faced by the industry. Access to transmission infrastructure exemplifies this. For instance, these could be achieved through a series of strategic and coordinated workshops with distinct user groups, such as broadcasters, consumers, operational technology partners, iwi Radio, emergency management, and others.
56. Te Māngai Pāho's 'Punga Net' system, which connects studios and networks' content digitally, demonstrates how a government initiative could potentially offer a broader industry solution. A similar approach is necessary to tackle the challenges faced by the broadcast industry.
57. The government should implement a comprehensive survey to isolate and assess radio's linguistic impact, particularly focusing on iwi radio. Additionally, it should establish a formal validation process and robust data capture mechanisms to monitor the role of iwi radio as a daily reinforcement tool for te reo and Te Ao Māori among Māori communities.