



20 March 2026

Ref: DOIA-REQ-0026009-Sam Brown

Sam Brown

Email: fyi-request-33467-f67c69a9@requests.fyi.org.nz

Tēnā koe Sam

Thank you for your email of 8 January 2026 to the Ministry of Business, Innovation and Employment (MBIE) requesting, under the Official Information Act 1982 (the Act), the following information:

1. *All policy documents, ministerial briefings, or strategic reviews from 2020 to present regarding spectrum allocation for rural broadband and fixed wireless access services, including:*
 - *Assessment of spectrum needs for rural connectivity providers*
 - *Policy objectives for making spectrum available for regional broadband deployment*
 - *Reviews of whether current spectrum allocation frameworks adequately support rural connectivity objectives*
2. *Information regarding the 3.3-3.34GHz spectrum allocation process conducted approximately 2022-2023, including:*
 - *Policy rationale for offering 6-month "exclusive rights to apply" rather than direct spectrum licenses*
 - *Assessment of whether 6-month timeframe was adequate for:*
 - *Technology platform selection and vendor engagement*
 - *Funding arrangement finalisation*
 - *Security clearance processes*
 - *Actual license application preparation*
 - *Number of entities that obtained exclusive rights versus number that successfully obtained licenses*
 - *Current status and usage of 3.3-3.34GHz spectrum in regions where exclusive rights were forfeited*
 - *Any review or lessons learned from this allocation process*
3. *Any analysis of 6GHz spectrum availability and potential for rural broadband deployment, including:*
 - *Assessment of 6GHz spectrum for fixed wireless access services*
 - *International approaches to 6GHz deployment (particularly USA's Automatic Frequency Coordination system)*
 - *Whether RSM or MBIE has assessed developing AFC or similar coordination mechanisms for New Zealand*
 - *Timeline for potential 6GHz availability for outdoor fixed wireless use*
 - *Any industry consultation or proposals received regarding 6GHz access*
 - *Whether spectrum availability constraints are identified as limiting rural broadband deployment*

4. *Any assessment of spectrum availability imbalances between different provider types, including:*
 - *Spectrum holdings by mobile network operators versus fixed wireless operators*
 - *Whether spectrum allocation policy considers competitive balance in rural connectivity markets*
 - *Assessment of whether limited spectrum availability for WISPs/fixed wireless operators constrains their ability to compete with mobile operators or satellite services in rural areas*
5. *Any advice to Ministers regarding:*
 - *Whether current spectrum management frameworks adequately support rural connectivity policy objectives*
 - *Resource constraints within RSM affecting spectrum policy development or allocation processes*
 - *International spectrum developments (WiFi 7, 6GHz, AFC systems) and implications for New Zealand policy*
 - *Whether spectrum policy is coordinated with rural connectivity funding programmes and infrastructure policy*
6. *Any correspondence with telecommunications industry participants regarding:*
 - *Spectrum needs for rural broadband provision*
 - *Barriers to accessing spectrum suitable for fixed wireless deployment*
 - *Requests for 6GHz access or AFC system development*
 - *Feedback on 3.3-3.34GHz allocation process*

Please find attached the documentation relevant to your request as set out in the attached document schedule.

Please note some information has been withheld under the following sections of the Act:

- 9(2)(a), to protect the privacy of natural persons, including that of deceased natural persons;
- 9(2)(b)(ii), to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information;
- 9(2)(ba)(i), to protect information which is subject to an obligation of confidence or which any person has been or could be compelled to provide under the authority of any enactment, where the making available of the information would be likely to prejudice the supply of similar information, or information from the same source, and it is in the public interest that such information should continue to be supplied;
- 9(2)(f)(iv), to maintain the constitutional conventions for the time being which protect the confidentiality of advice tendered by Ministers of the Crown and officials;
- 9(2)(g)(i), to maintain the effective conduct of public affairs through the free and frank expression of opinions by or between or to Ministers of the Crown or members of an organisation or officers and employees of any public service agency or organisation in the course of their duty;
- 9(2)(h), to maintain legal professional privilege; and
- 9(2)(j), to enable a Minister of the Crown or any public service agency or organisation holding the information to carry on, without prejudice or disadvantage, negotiations (including commercial and industrial negotiations).

Information has been withheld under section 18(d) as it is out of scope. Where documents are publicly available I have also refused these under section 18(d), as it is publicly available, however, I have provided links to where you can find these documents in the attached document schedule.

I do not consider that the withholding of this information is outweighed by public interest considerations in making the information available.

On 5 February 2026 we contacted you asking you to narrow the scope of your request in relation to part 6, unfortunately after we applied the additional parameters you had provided in your response the scope of the request was still far too large as the results of the search encompassed over 1000 emails in scope. Therefore, I refuse part 6 of your request under section 18(f) of the Act, as the information requested cannot be made available without substantial collation or research.

If you wish to discuss any aspect of your request or this response, or if you require any further assistance, please contact OIA@mbie.govt.nz.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

Nāku noa, nā

A handwritten signature in black ink, appearing to be 'D O'Grady', written in a cursive style.

Daniel O'Grady
Manager, RSM Policy and Planning
Communication, Infrastructure and Trade

Document Schedule

Documents released

#	Date	Description	Withholding grounds
1	18 January 2022	2122-1979 Briefing. Cabinet paper - Allocation of 3.5 GHz spectrum to support rollout of 5G and advancement of rural connectivi.pdf	Information withheld under section 9(2)(a)
2	24 November 2021	2122-1395 Briefing - Allocation of 3.5GHz spectrum to support rollout of 5G and advancement of rural connectivity.pdf	Information withheld under section 9(2)(a) and 9(2)(ba)(i)
3	23 September 2020	2021-0911 Rural Connectivity in New Zealand.pdf	Information withheld under section 9(2)(a)
4	23 August 2021	2122-0499 Briefing 5G Infrastructure Project - a rural-focussed package.pdf	Information withheld under section 9(2)(a), 9(2)(b)(ii) and 9(2)g(i)
5	20 April 2023	2223-3301 Initial policy decisions on the 24 - 30 GHz radio spectrum range SIGNED.pdf	Information withheld under section 9(2)(a) and 9(2)(b)(ii)
6	10 March 2023	2223-2369 Decisions on 3.3-3.4 GHz non-national spectrum assignment.pdf - signed.pdf	Information withheld under section 9(2)(a)
7	24 March 2023	2223-3164 Update on 3.30-3.34 GHz regional broadband non-national spectrum assignment SIGNED.pdf	Information withheld under section 9(2)(a)
8	28 February 2024	SIGNED 2324-1616 Update on 24 - 30 GHz Project.pdf	Information withheld under section 9(2)(a), 9(2)(b)(ii) and Out of scope
9	15 January 2026	FW: Some proposed next-steps for AFC systems	Information withheld under section 9(2)(a)
10		Response to submissions 5-year spectrum Outlook	Released in full
11	20 October 2023	Decisions on 3.30-3.34 GHz transition to first-in-time licencing	Information withheld under sections 9(2)(a) and out of scope

#	Date	Description	Withholding grounds
12		[Draft for review] 3.30 – 3.4 GHz Regional Broadband Internal Decision Document	Information withheld under section 9(2)a
13		3.3 – 3.4 GHz Options Analysis	Information withheld under sections 9(2)h and 9(2)b(ii)
14		Reflections on 3.30 – 3.34 GHz	Information withheld under sections 9(2)g(i)
15		3.3-3.4 GHz licensing tracking	Released in full
16		Exclusive rights holders finalized list	Information withheld under sections 9(2)a
17		3.3-3.4 GHz Decisions	Released in full
18		3.3-3.4 project notes at November 2022	Released in full
19		Outcome of consultation on using 6 GHz band for Wi-Fi 2122-0776	Information withheld under section 9(2)(a)
20	23 November 2025	Communications Officials_ Fortnightly Report for Fortnight Ending 23 November 2025 .pdf	Information withheld under section 9(2)(a) and out of scope
21	7 December 2025	Communications Officials_ Fortnightly Report for Fortnight Ending 07 December 2025 .pdf	Information withheld under section 9(2)(a) and out of scope
22	3 March 2024	2324-1452 Communications Officials_ Weekly Report for week ending 3 Mar 2024.pdf	Information withheld under section 9(2)(a) and out of scope
23	3 July 2025	6 GHz FWA trial licences request.pdf RE_ 6 GHz FWA trial licences request _IN-CONFIDENCE - RELEASE EXTERNAL_.pdf	9(2)a 9(2)(b)(ii)
24	4 October 2025	Fwd 6 GHz FWA trial licences request [IN-CONFIDENCE - RELEASE EXTERNAL] [UNCLASSIFIED].pdf	9(2)a
25	9 October 2025	RE 6 GHz FWA trial licences request [UNCLASSIFIED].pdf	9(2)a
26	23 July 2025	Re_ 6 GHz FWA trial licences request _UNCLASSIFIED_.pdf	9(2)a
27	1 September 2025	RE 6 GHz FWA trial licences request [UNCLASSIFIED]	9(2)a

#	Date	Description	Withholding grounds
28	N/A	Radio Spectrum Outlook Consultation Response from Telco2 Ltd.pdf	9(2)a
29	3 July 2025	6 GHz Trial for Manawatu - Google Docs.pdf	9(2)a
30	17 November 2023	6084HH_Report_FCC_MPE_6948201_(5.1, 5.8 GHz)	Released in full
31	17 November 2023	6084HH_Report_FCC_RF_FR380325_(5.1, 5.8 GHz part 1).pdf	Released in full
32	17 November 2023	6084HH_Report_FCC_RF_FR380325_(5.1, 5.8 GHz part 2).pdf	Released in full
33	17 November 2023	6084HH_Report_FCC_RF_FR380325-01_(6 GHz).pdf	Released in full
34	21 October 2023	6092HH_FA470407-01_FCC MPE Test Report.pdf	Released in full
35	29 August 2024	6092HH_FR470407_FCC RF Test Report_5G UNII3.pdf	Released in full
36	24 October 2024	6092HH_FR470407-01AA_FCC RF Test Report_5G UNII1.pdf	Released in full
37	29 February 2024	E513139-A6065-CB-1-Amendment-2.pdf	Released in full
38	29 February 2024	E513139-A6065-CB-1-Original.pdf	Released in full
39	1 January 2025	SDOC_450v_6084HH_tc2.pdf	s(2)a
40	1 January 2025	SDOC_450v_6092HH_tc2.pdf	s(2)a

Documents withheld in full

#	Date	Description	Withholding grounds
1	N/A	Inspire Trial Setup North Range Road.pdf	Refused in full under section 9(2)b(ii)
2	N/A	Inspire Trial Setup Saddle Hill.pdf	Refused in full under section 9(2)b(ii)
3	N/A	Inspire Trial Setup Te Mata Linton.pdf	Refused in full under section 9(2)b(ii)
4	N/A	Review of AFC Proposal Documents	Withheld in full s 9(2)f(iv)
4		RE_ 3_3GHz - Auction Catalogue - Draft IN-CONFIDENCE RELEASE-EXTERNAL	Refused in full under section 9(2)(h)
6		RE_ New information on 3_30-3_34_ further licence query_planned licences	Refused in full under section 9(2)(h)
7		RE_ Policy logic and legal view on the acquisition limit IN-CONFIDENCE	Refused in full under section 9(2)(h)
8	12 May 2024	2324-1462 Communications Officials_ Weekly Report for week ending 12 May 2024.pdf	Information withheld in full under section 9(2)g(i), 9(2)(a) and out of scope
9	N/A	AFC Full Proposal Telco2 Inspire Cambium Qualcomm - Google Docs.pdf	Refused in full under section 9(2)b(ii)
10	N/A	450v trial Link Budget and CN objectives	Refused in full under section 9(2)b(ii)
11	N/A	afc_trial_records_example_20250729.txt	Refused in full under section 9(2)b(ii)

Documents refused under section 18(d) as publicly available

#	Date	Description	Link to publicly available information
1	18 April 2023	Six-month Right to Place 3.30-3.34GHz Non-national Spectrum Licenses: Auction Catalogue	Refused in full under section 18(d) Auction 26 Radio Spectrum Management New Zealand
2	April 2025	Unlocking-6-GHz-Wi-Fi-whitepaper-Qualcomm-AFC-Suite.pdf	Refused in full under section 18(d) Unlocking-6-GHz-Wi-Fi-whitepaper-Qualcomm-AFC-Suite.pdf
3	16 February 2024	ISED_AFC_Data_Glossary.pdf	Refused in full under section 18(d) AFC Data Glossary.pdf
4	25 April 2025	WINNF-TS-1014.pdf	Refused in full under section 18(d) WINNF-TS-1014.pdf
5	N/A	6084HH Antenna Specification.pdf	Refused in full under section 18(d) 7331792.pdf
6	29 February 2024	6084HH_Cert_CB_Safety_IEC62368-1_DK-150779-UL.pdf	Refused in full under section 18(d) DK-150779-UL IECCE Certificates
7	29 February 2024	6084HH_Report_CB_Safety_IEC62368-1_E513139-A6065-CB-1.pdf	Refused in full under section 18(d) pc_2149-CB_Report_USB-EXT-2-1G
8	6 May 2025	6084JH_Cert_CB_Safety_IEC62368-1_DK-150779-M3-UL_(Thailand Factory).pdf	Refused in full under section 18(d) DK-150779-M3-UL IECCE Certificates
9		6092HH Antenna Specification.pdf	Refused in full under section 18(d) 6937186.pdf
10	2023	AFC System to AFC Device Interface Specification v1.5.pdf	Refused in full under section 18(d) 6 GHz AFC Resources Wi-Fi Alliance
11	2023	AFC_System_Reference_Model_v1.0.pdf	Refused in full under section 18(d) 6 GHz AFC Resources Wi-Fi Alliance
12	2025	Cambium_Networks_data_sheet_2x2_450v.pdf	Refused in full under section 18(d) Cambium Networks data sheet 2 x2 PMP 450v SM.pdf

#	Date	Description	Link to publicly available information
13	2024	Cambium_Networks_data_sheet_PMP_450v AP.pdf	Refused in full under section 18(d) PMP-450v-4x4-Fixed-Wireless-SM-and-PTP-Backhaul-Data-Sheet.pdf
14	15 March 2024	DA-24-166A1_Rcd.pdf	Refused in full under section 18(d) DA-24-166A1.pdf
15	5 February 2025	E513139-A6065-CB-1-Amendment-1.pdf	Refused in full under section 18(d) Test-Report-Audio_Video-Info-and-Comm-Tech-Equipment-Safety-Requirements-E322375-A6031-CB-1.pdf
16		WGND0C01-#5123270-v5-MBIE_- Licence Agreement (for licences within 3.30-3.34GHz Non-national spectrum) with [operator]	Refused in full under section 18(d) https://www.rsm.govt.nz/assets/Uploads/documents/auctions/licence-agreement-for-licences-within-3.30-3.34ghz.pdf