



13 March 2026

Ref: DOIA-REQ-0027681

Sam Brown

Email: fyi-request-33735-335297aa@requests.fyi.org.nz

Tēnā koe Sam

Thank you for your email of 15 February 2026 to the Ministry of Business, Innovation and Employment (MBIE) requesting, under the Official Information Act 1982 (the Act), the following information:

“Under the Official Information Act 1982, I request information regarding the resources expended on the 3.3-3.34GHz regional spectrum allocation process conducted approximately 2022-2023:

1. Staff time and internal costs

- a) Total staff hours spent on policy development, design, and administration of the 3.3-3.34GHz exclusive rights to apply process*
- b) Staff hours spent processing exclusive rights applications and associated correspondence*
- c) Estimated internal cost (salary/overhead basis) attributable to this process*
- d) Staff time spent managing the forfeiture process when exclusive rights were not converted to licences*

2. External and associated costs

- a) Any external consultant, legal, or advisory costs incurred in designing or administering the process*
- b) Any costs associated with advertising, public consultation, or stakeholder engagement*
- c) IT or system costs for managing applications or the allocation process*
- d) Any costs associated with post-process review or lessons learned activities*

3. Outcomes achieved

- a) Number of exclusive rights to apply granted*
- b) Number of exclusive rights successfully converted to spectrum licences*
- c) Number of exclusive rights forfeited or allowed to lapse*
- d) Current utilisation status of 3.3-3.34GHz spectrum in regions where exclusive rights were forfeited (i.e., whether the spectrum remains unused)*
- e) Whether any post-process review or lessons learned document was produced, and if so, please provide it*

4. Opportunity cost context

- a) Whether RSM assessed alternative allocation approaches (e.g., direct licensing, open access, shorter-duration licences) and, if so, any comparative analysis of those alternatives versus the exclusive rights approach chosen.”*

I am refusing question 1 of your request under section 18(e) of the Act as the document alleged to contain the information requested does not exist or, despite reasonable efforts to locate it, cannot be found.

Regarding question 2, I can advise that there were external costs of \$51,966.98 relating to auction services and \$30,450 for legal cost of drafting contracts.

I am refusing part d) of question 3 under section 18(e) of the Act as the document alleged to contain the information requested does not exist or, despite reasonable efforts to locate it, cannot be found. I do note that information on the location of existing licences can be found on in the publicly available register of radio frequencies and this data could be used to determine which areas spectrum remains unused. The register can be found here: rrf.rsm.govt.nz/ui?state=1.

For parts a) and e) of question 3 and question 4, there are seven documents that fall within the scope of these parts of your request. A table detailing these is appended below at **Table one**. I am releasing two of these documents in full and partially releasing five documents. Some information has been withheld under the following sections of the Act:

- 9(2)(b)(ii), to protect information where 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)(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; and
- 9(2)(h), to protect legal professional privilege.

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

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

Table one: documents in scope

#	Document name	Document date	Released or withheld	Reason for withholding
1	3.3 – 3.4 GHz Options Analysis	Undated	Released in full	-
2	[Draft for review] 3.30 – 3.4 GHz Regional Broadband Internal Decision Document	Undated	Partially released	9(2)(b)(ii) 9(2)(h)
3	Reflections on 3.30 – 3.34 GHz	Undated	Partially released	9(2)(g)(i)
4	3.3-3.4 GHz licensing tracking	Undated	Released in full	-
5	Exclusive rights holders finalized list	Undated	Partially released	9(2)(a)
6	[Briefing #2223-2369] Decisions on 3.3-3.4 GHz non-national spectrum assignment	10 March 2023	Partially released	9(2)(a)
7	[Briefing #2223-3164] Update on 3.30-3.34 GHz regional broadband non-national spectrum assignment	24 March 2023	Partially released	9(2)(a)