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**Vector Limited**  
101 Carlton Gore Road  
PO Box 99882, Newmarket  
Auckland 1149, New Zealand  
[www.vector.co.nz](http://www.vector.co.nz)  
Corporate Telephone  
+64-9-978 7788  
Corporate Facsimile  
+64-9-978 7799

Radio Spectrum Policy and Planning  
Infrastructure and Resources Markets  
Ministry of Business, Innovation and Employment  
PO Box 2847  
Wellington 6140

By email: [radiospectrum@mbie.govt.nz](mailto:radiospectrum@mbie.govt.nz)

## **Submission on the Proposed Withdrawal of the Network Clause in the GURL for Short Range Devices**

### **Introduction**

1. Vector Limited ("Vector") welcomes the opportunity to make this submission on the Ministry of Business, Innovation and Employment's ("MBIE") consultation paper, *921 – 928 MHz Proposed withdrawal of the network clause – General User Radio Licence for Short Range Devices*, released for consultation in January 2015.
2. No part of this submission is confidential and we are happy for it to be made publicly available.
3. Vector's contact person for this submission is:  
Luz Rose  
Senior Regulatory Analyst  
[Luz.Rose@vector.co.nz](mailto:Luz.Rose@vector.co.nz)  
(04) 803 9051

### **Withdrawal of the network clause**

4. As indicated in the consultation paper, MBIE intends to withdraw the network clause from the General User Radio Licence ("GURL") for Short Range Devices ("SRDs") covering the 921-928 MHz band. The network clause "allows higher out of band emissions than otherwise, but also limits the extent of simultaneous use in a defined area" (consultation paper, footnote 1).
5. MBIE considers, following stakeholder consultation, that the above clause appears to be "of limited use to the electricity metering industry and causes interference concerns to the cellular network operators" (page 5).

*Timeframe*

6. MBIE proposes to withdraw the said network clause on 1 August 2015.
7. We have no issues with the timing of this withdrawal.

*Grandfathering clause*

8. The consultation paper indicates that the "current grandfathering conditions in the GURL-SRD will allow any devices in operation under the network clause before 1 August 2015 to carry on until the end of life" (page 5).
9. We have no issues with the application of the above grandfathering conditions.
10. We understand there may be concerns regarding potential interference associated with large metering deployments, and their impact on neighbouring major radio operators in the future. This implies there are currently no known significant interference issues in the relevant frequencies.
11. In this connection, we suggest that MBIE make it clear that the grandfathering includes maintaining currently deployed equipment with already manufactured stock that may be operating under the network clause (but not adding new product or large scale deployment of radio devices).

**Concluding comment**

12. Please contact us if you have any questions or require further information.

Yours sincerely



Ian Ferguson  
**Regulatory Policy Manager**