Submission to Manatū Taonga | Ministry for Culture and Heritage
From NZ On Air | Irirangi Te Motu

21 March 2025

Media Reform

Purpose

This document provides feedback on the Media Reform package issued for consultation on 12 February 2025. It is in two parts. Part 1 provides feedback on Draft Proposals 1-4. Part 2 provides substantive feedback on Draft Proposal 5: *Streamlining Crown Content Funders*.

Introduction

NZ On Air | Irirangi Te Motu (the Broadcasting Commission) is an Autonomous Crown Entity established under the Broadcasting Act 1989. NZ On Air's primary function is to *reflect and develop New Zealand identity and culture* by promoting (funding) programmes about Aotearoa New Zealand and New Zealand interests and promoting Māori language and Māori culture.

The core function of NZ On Air is to manage and distribute public funds via funding contracts between the agency and content creators, service providers and platforms. Funded content includes screen, music, games, podcasts and some radio programmes, while we also provide operational funding for vital public media platforms and services. This includes captioning and audio description, access radio and student radio, Pacific media and curated websites presenting the history of NZ music and screen content. We also administer the Game Development Sector Rebate, invest in research, and in capability initiatives across screen and music.

While our legislated remit is clearly cultural, our impacts include strong economic benefits. Funding quality local content contributes to the viability of local platforms and creates work for local people in the production, music and game development sectors. Increasingly we are seeing international finance attached to local productions that both elevates budgets and expands audience reach beyond our shores. Productions and games sold internationally also bring in export revenue, and international co-productions create additional spend in our economy. Increasing international co-productions also provide invaluable exposure for New Zealand and its stories and people on the world stage.

Executive summary

NZ On Air welcomes the opportunity to engage in a discussion of the need for Media Reform. It has been 36 years since the Broadcasting Act was passed and much has changed since then. More recently, the local media sector has been beset with financial challenges. There is a real possibility of losing some local platforms entirely, and with them, access to a raft of local content. It is clear that action or actions should be taken.

Our question is whether the problem definition in the Media Reform consultation paper and the offered solutions are well-matched. And further, whether these proposals are addressing the areas that are highest priority and would have material impact in addressing the current issues in local media.

We submit that media reform should be driven by two key priorities: first, retaining a focus on content that serves all audiences of New Zealand and second; ensuring the financial sustainability and success of the sectors we support. Reform should ultimately lead to more New Zealanders across all communities being able to discover, engage with, and benefit from content that reflects their lives and experiences.

Part 1

Draft proposal 1: Ensuring accessibility of local media platforms

Do you agree with the proposal? Why/why not?

NZ On Air's *Where Are The Audiences* research has shown over the past 10 years that the prevalence of smart TVs in homes has aligned with greater use of online content (such as YouTube) and streaming platforms during what used to be the linear television prime time. In other words, it is now easier to sit down and watch this content on the device once used for linear television. Ensuring local apps are as easy to find and use as these global apps will ensure viewers can more easily choose to watch local content again. It would be important to establish whether requiring local apps on Smart TVs would have an inflationary effect on the cost of the devices in NZ. We assume the makers will be required to ensure that local apps are prominently available in the Smart TVs' app store, as part of the software localisation that already happens, meaning the cost would be negligible.

Do you prefer another option to address this issue?

No.

Do you agree with the broad definitions used for the proposal? Why/why not?

Yes

What are your views on the issue of radio prominence and potential future impacts?

If this proposal is to proceed it would seem prudent to future-proof the requirement, to include online radio prominence. The likes of iHeartRadio, rova and RNZ could be captured by this. We have started to see an increase in online radio/podcast listening in our *Where Are The Audiences* research and this would no doubt be enhanced by easier discoverability of these apps on connected devices and in-car entertainment systems.

Draft proposal 2: Increasing investment into and discoverability of local content

Do you agree with the proposal? Why/why not?

Our *Where are the Audiences* research points to the fact that global streaming platforms have become increasingly popular with New Zealand audiences. And we agree that the relatively low level of local content on these platforms means local audiences are missing out on local stories. NZ On Air's funding model requires an eligible platform to support producers in their application for funding. This has generally been required to ensure there is a path to the audience, promotion of the content and commissioning oversight. This support from local platforms has been crucial in ensuring audiences are aware of and can enjoy local content.

Conversely the global streamers have shown little interest in commissioning or acquiring local content. In an environment where local platforms are financially constrained in their ability to support local producers, and streamers are uninclined to support local production, there is an obvious risk that audiences will miss out on local content.

The proposal suggests that all New Zealand TV broadcasters, New Zealand streaming platforms and global streaming platforms should be required to invest (a proportion of annual revenue) in the creation or acquisition of local content. We agree with the intent of the proposal and support the encouragement of global streamers to the table in a way that incentivises the commissioning and acquisition of local content. But we have concerns about how the proposal can be implemented and whether it will materially impact audiences or the media ecosystem. Specifically, we note:

1. There is no clarity as to the calculation that may be used. Noting that local platforms may already meet the likely obligations, we suggest more detail is required on how a levy or investment requirement would be quantified and administered, and what impact the investment requirement would materially have on the ecosystem.
2. Local platforms, that have been effective in commissioning and promoting local content, have come under increasing financial pressure - partially because audiences have moved to other platforms (and we would note YouTube is actually the most popular platform for local audiences, not the streamers), and partially because advertising revenue has moved to other global companies (predominantly Meta and Google). It is unlikely that requiring streamers to engage more fully in the local market will fully mitigate these issues. Whilst requiring global steamers to engage more meaningfully in the local marketplace may have a positive impact on the local production sector (perhaps seeing an increase in local productions) this might come at the expense of, and further erosion of audiences on, local platforms.

The proposal further suggests that measures would be required to aid in the discovery of content and whilst we agree that discoverability of content has become increasingly difficult in a fragmented media landscape, we would be interested in the detail of how this aspect would be addressed. We presume a local 'belt' within the streamers' platforms is envisaged. A requirement that this 'belt' is featured prominently on the main page would aid discoverability, as would a requirement that local content is also promoted 'off-platform'.

Any measures that bring the global streamers to the table should ideally be additive to activity in the sector and we advocate that should additional revenue be obtained through this intervention these funds be ring fenced for the further investment in local content.

Do you prefer another option to address this issue?

A further consideration, if this proposal is to proceed, would be to ask if a similar approach should be taken to increase the chance of local audiences discovering local music on the global music streaming platforms. Should they be required to somehow prioritise or promote New Zealand music within the algorithm for New Zealand consumers?

The problem in the music space is very similar to screen. Just 6% of music available on the major music streamers in New Zealand is local music, yet there is no shortage of quality NZ music being made – NZ On Air funded 246 new singles in the 2023/24 year and 56 multi-track projects.

Some overseas options have a combination of options – for example, both an investment obligation and a levy. Do you think this would be a good option in New Zealand?

Without a greater level of detail about the level of investment or the levy suggested it is difficult to comment. As stated above, we welcome any initiative that seeks to bring the streaming platforms to the table and lean into local content obligations. Should a levy be significant enough, we strongly submit that it must be set aside to fund further local content.

What should the definition of 'local content' include?

We note that there will likely be a divergence of view about what should be defined as local – especially where platforms are already investing in what they might define as 'local content'. The definition that pulls from the wording of the Broadcasting Act and other NZ On Air accountability documents, that has been accepted over time, would suggest a definition such as:

> *"content that reflects and develops NZ culture and identity, stories, places, voices and faces, and is made by New Zealanders in key roles, and is for New Zealanders."*

It is important to put parameters around what is 'local' to ensure that content is authentically made, by New Zealanders for New Zealand and international audiences. If content were to meet the same 'local' standards we apply to funding applications, it is possible these productions might qualify for NZ On Air funding.

Should aired sport events featuring New Zealanders/ New Zealand teams qualify as local content? Why/why not?

Arguably sport is a big part of the New Zealand culture and identity and therefore should qualify as local content. However, defining sport as local content for the purposes of media reform could have unintended consequences. Local platforms could be outbid for local sports rights by streamers seeking to maximise their 'local content' requirements with commercially valuable and monetisable sports content and further weakening the local platforms. One of the reasons NZ On Air doesn't fund sport or news content is because it was considered local content that was already well-covered without our intervention. That has continued to be the case.

An option might be to create a tiered or points system, whereby sports is counted as 'local content' but other types of content with stronger public media value are meaningfully upweighted, giving the streamers the incentive to support drama and documentary, for example.

Should sub-requirements be used to specify certain sorts of local content that a proportion of the investment must be spent on? If so what sort of content? Why?

We note that the proposal document suggests:

Sub-requirements could specify that a proportion of the investment must be spent on particular kinds of local content to address areas of public benefit such as children's content, content by independent producers, content in te reo Māori or reflecting Māori perspectives.

We agree. And note that this wording is similar to that contained in the Broadcasting Act 1989.

Drama and documentary are also specifically called out in the Broadcasting Act 1989 as requiring specific funding support and attention. We would suggest this could be carried through here. For instance, drama is expensive to make, faces significant international competition and provides significant economic value as regards employment so any investment in it has far-reaching benefits for New Zealand.

Draft proposal 3: Increasing captioning and audio description (CAD)

Do you agree with the proposal? Why/why not?

As the current funder of Able, the service delivering CAD on local platforms, we agree there is a need for more CAD to increase accessibility and agree that it would need to be a phased approach. As a priority, platforms must be tech-enabled so that these services can be carried. This is currently a significant impediment for delivery of CAD across some local linear and online platforms. This should be at the broadcasters' expense as it is an investment in their platform and should be seen as a minimum cost of doing business.

However, we are concerned about placing all the cost at the feet of the broadcast platforms, which risks compounding the already difficult fiscal state of local platforms and potentially resulting in less investment in local content.

The ring-fenced funding provided through NZ On Air to Able has at least meant these services have not been at the mercy of the commercial decisions of the struggling platforms, and they can be more responsive to the needs of the audience. If the targets suggested are to be met, realistically this will require an increase in funding to Able via NZ On Air. A phased approach could see this investment of public funds decreasing over time with broadcasters picking up more of the cost in future years. We note that costs for delivery of captioning may decrease in the near future as AI capability increases – although there will need to be quality targets to ensure any AI generated captions are suitable. Current commercially available AI caption generators do not cope with te reo Māori, Pacific languages and the New Zealand accent.

A timeline would need to acknowledge that even with greater investment Able would need time to increase its resourcing in order to deliver higher outputs along with relevant platforms being technically enabled to deliver CAD.

Do you prefer another option to address this issue?

In the short-term at least, it would be safer to increase funding of CAD via NZ On Air (ring-fenced) alongside the requirement to scale up provision of CAD to offset the costs, at a time when our broadcast platforms are struggling. This would also offset the risk of these platforms having to cut back their investment in local content to afford increased CAD.

Should certain types of content be prioritised for captioning and audio description? If so, how?

NZ On Air currently requires Able to prioritise local content. This should remain a priority.

Draft proposal 4: Modernising professional media regulation

Do you agree with the proposal? Why/why not?

We agree the standards regime is outdated and that this proposal addresses a wider range of content in a more consistent way than is currently the case. The current situation is exacerbating the proliferation of mis and disinformation as some new media can disseminate this with no consequences. This is harming democracy and social cohesion.

We note there are gaps in the proposal. Social media platforms are defined in the proposal as *'primarily hosting user-generated content'* yet increasingly they are the vehicle for the sharing of 'professional content' over which there is no standards control (other than these platforms own 'standards'). So, the content sources where arguably the most harm is occurring are excluded from the proposals.

It is unclear who the complaints body would be for the broadcasters, streamers etc not covered by the NZ Media Council, if the Broadcasting Standards Authority is to be the regulator rather than a complaints body. It is unclear if bloggers will be captured by this proposal (although this may be determined by the definition of 'professional media'). And the Classifications Office is to remain? This appears to offer only a very limited fix to the problem.

It is not clear how the layering of a self-regulatory body between the media and the regulator would simplify or strengthen the system, nor is it clear what the cost implications would be for the new bodies contemplated.

Do you prefer another option to address this issue?

We prefer the option that can be implemented <u>now</u>, but with the flexibility to increase the range and type of media covered at a future date. These reforms are urgently needed.

We advocate for a system that simplifies the regulatory landscape and provides regulation to prevent harm whilst preserving freedom of expression.

Part 2

Draft proposal 5: Streamlining Crown content funders

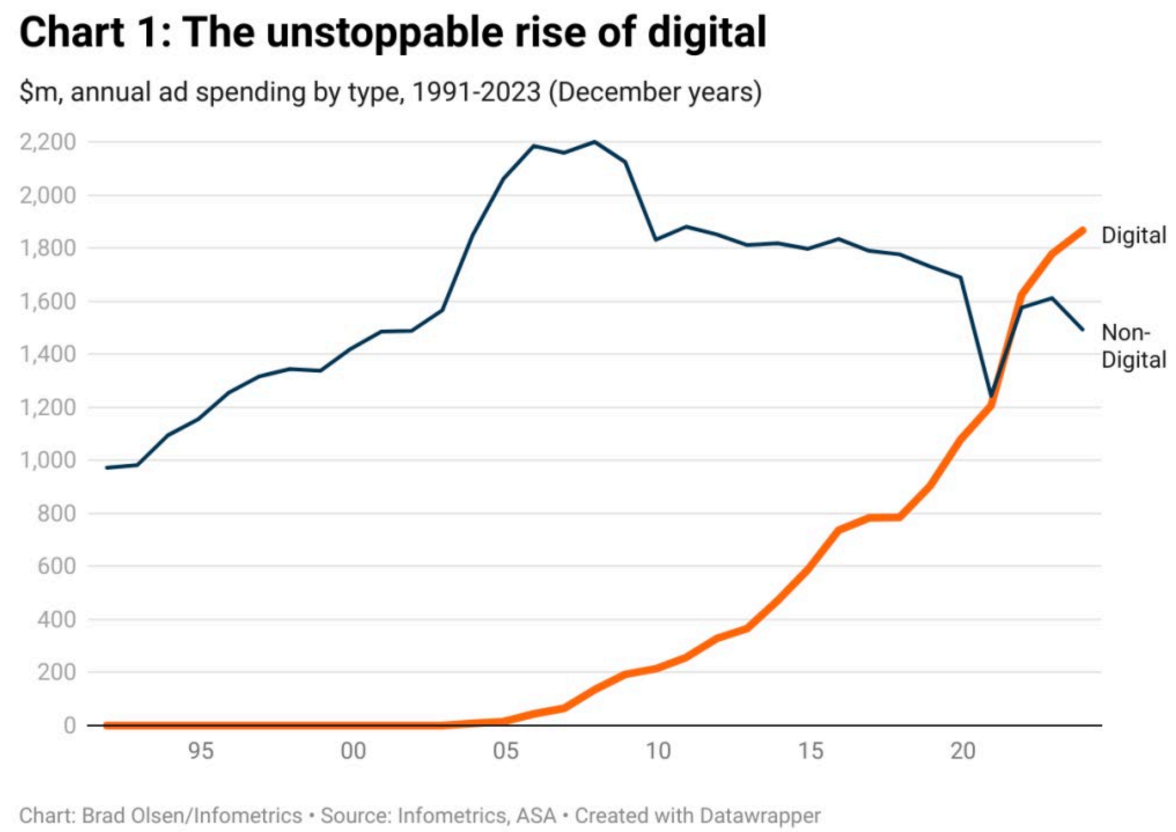
Do you agree with the proposal? Why/why not?

Before we comment on the proposal, we wish to note that the case for change is of fundamental importance when assessing any proposal for restructure. The document outlines upfront several challenges in the media landscape, finally concluding that:

the sector is facing fundamental challenges to its viability, including sharply declining revenues for local media companies. Significant redundancies, pay cuts, and the reduction or closure of services have long-term impacts on sector capability and reduce the range of media choice for New Zealanders.

We agree and note this is backed by the 2024 research ***'A shifting media funding landscape – the trends in advertising spend'*** which states:

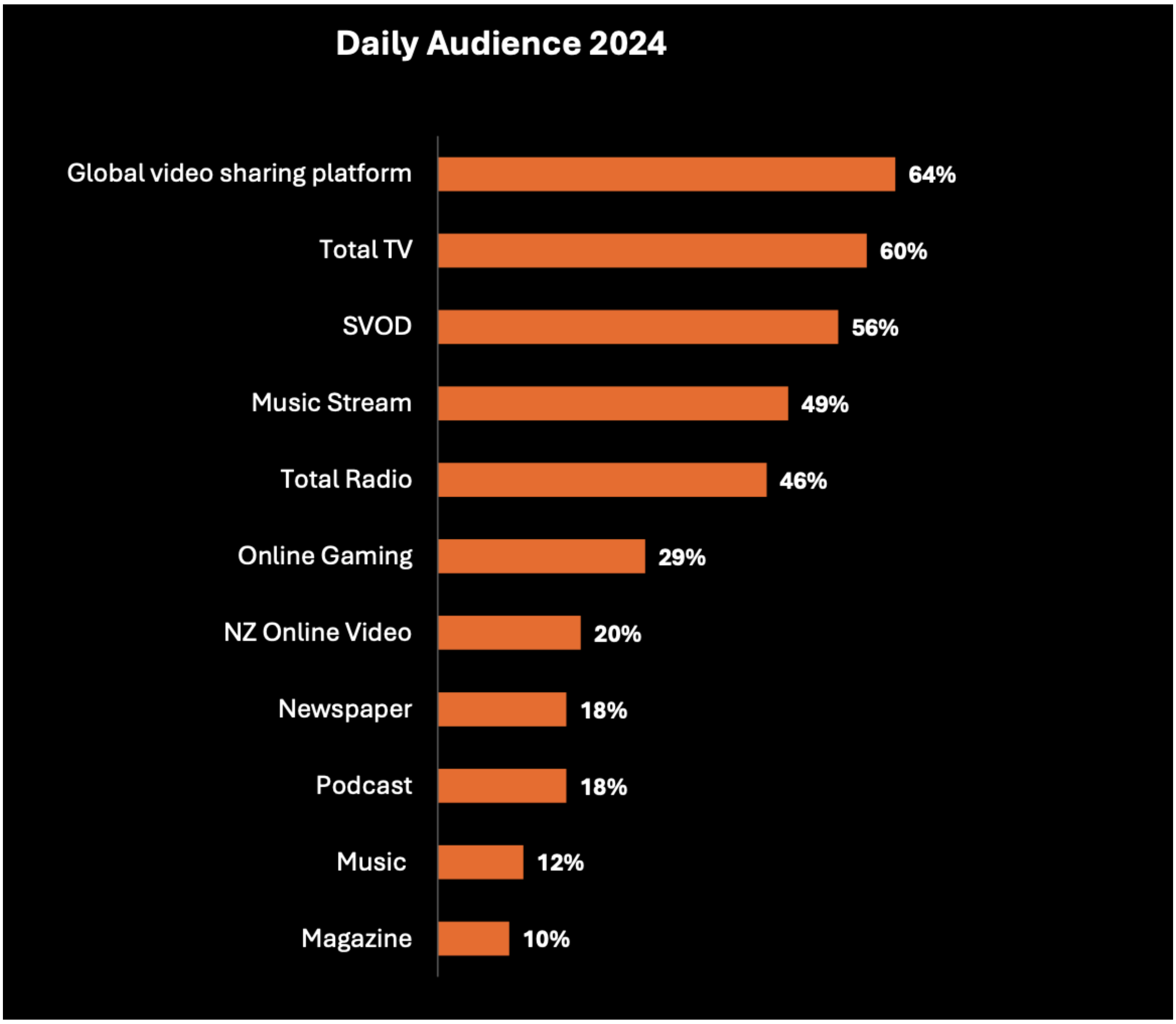
Digital ad spending has been undergoing a seemingly unstoppable rise since it appeared into the ad realm in the 2000s. However, it was only in the 2021 calendar year that digital surpassed combined non-digital ad spending on other media. By 2023, digital ad spending totalled $1.87b, a 4.9%pa increase on the previous year. Spending on digital-only ads in 2023 totalled just over $370m more than non-digital ad spending combined. Non-digital spend totalled $1.49b, down 7.3% from a year before.



We submit the broader problem faced by the wider media ecosystem that includes broadcasters, and media (journalism) platforms is the significant loss in advertising income. It is through this lens that any solution should be considered.

Furthermore, we contend that NZ On Air's own *Where Are The Audiences* research has often been misrepresented in the debate over the ailing local media sector. New Zealand audiences are still watching 'television' (both linear and on-demand) in significant numbers. And quality content is available there. The problem is that advertisers have migrated a significant amount of their spend to digital platforms, owned offshore.

The most recent *Where Are The Audiences* findings noted: Total TV (Linear and local BVOD combined) reaches 60% of New Zealanders daily – only just pipped by Global Video sharing platforms (mainly YouTube). Linear TV accounts for 47% of this–; within this, the percentage who access via an FTA (free to air) platform or via a Pay TV platform is relatively similar, at 29% and 27%, respectively. Radio – via traditional broadcast – reaches over 4 in 10 (42%) New Zealanders each day, while Online New Zealand radio reaches 13%.



POTENTIAL MERGER OF NZ ON AIR AND THE NZ FILM COMMISSION: CONSIDERATIONS

The Case For a Merger

A consolidated entity could deliver several benefits as detailed in the following section.

More coherent funding approach: A single agency with responsibility for all screen content could create a more holistic, future-focused strategy for New Zealand's screen sector, regardless of format or distribution channel. For many working in the industry (both producers and platforms), a one-stop-funding-shop would allow for more coordinated and considered conversations around applications, audience trends, and media formats.

International precedents: Several comparable countries have successfully merged their screen funding bodies and produced strong global export outcomes for their local stories. Screen Australia combines both film and television funding without diminishing either format, while Screen Ireland has adopted a similar approach. These international examples demonstrate that consolidation can strengthen rather than weaken film and series support, particularly in smaller markets where scale matters. These agencies have managed to protect and celebrate what is unique about the different media formats.

Protect what works: If considering a merger, the focus should be on designing an entity that enhances rather than diminishes the strengths of both organisations. The merger should preserve and build upon the successful elements of each agency. Some local producers have expressed concern that a merger might diminish focus on certain types of content. However, a carefully designed entity with clear mandates and appropriately funded could strengthen rather than weaken our ability to support diverse content types while eliminating artificial format-based distinctions. Most importantly, we must identify, retain, and safeguard the most effective practices, relationships, and institutional knowledge from both agencies.

Strategic opportunity: For a sub-scale market like New Zealand, a focused, NZ-inc. strategy for growing domestic IP and exporting it globally could significantly strengthen our cultural and economic impact. A unified approach would better position New Zealand content internationally, allowing for coordinated marketing, distribution strategies, and international co-production opportunities.

Cross-discipline innovation: New Zealand could lead globally in how we approach cross-discipline funding across games, music, film, and TV. A merged entity (that retains all of the existing functions of both agencies) could develop clearer pathways for talent development that recognise how creators increasingly work across multiple formats and platforms. This integrated approach would leverage the natural connections between our creative sectors, already nurtured by NZ On Air.

Sector development coordination: The development of the sector is currently an explicit requirement of the NZFC but not NZ On Air. A unified entity could take a more comprehensive approach to industry development across all screen formats. With both NZFC and NZ On Air now funding projects alongside the NZSPR, we are increasingly supporting the same producers in accessing international distribution and finance.

Administrative efficiencies: While both agencies operate leanly (NZ On Air uses just 4% of its budget for admin), a merger could yield some modest savings in human resources, back-office operations, IT infrastructure, lease costs, and governance.

The Case for Further Consideration

While there are potential benefits to a merger, several important aspects require thorough consideration, as detailed in the following section.

Broader remit beyond screen content: NZ On Air's responsibilities extend significantly beyond screen content to audio (music, podcasts), journalism, and platform funding. Any merger must carefully consider how these functions would be preserved and strengthened rather than marginalised within a screen-focused entity or orphaned from necessary public funding.

Editorial independence considerations: We note another fundamental difference between the agencies that is not acknowledged in the document. This relates to Section 42 of the Broadcasting Act 1989 that states:

> *Prohibition in relation to certain directions. Nothing in this Act or the Crown Entities Act 2004 authorises the Commission to give a direction to any person to whom the Commission has made funds available under section 36, in respect of the editorial content of a particular programme.*

NZ On Air operates under statutory protections preventing direction regarding editorial content. This has enabled arm's-length funding of journalism and current affairs, which plays a vital role in our democracy. This is different from the NZFC, which has a broader remit to develop the sector and therefore engage more meaningfully in the creation of content funded. It is not clear from the document whether an editorial remit will or won't be excluded from a merged entity. We recommend that a merged entity would need to maintain these protections and clarify whether journalism and current affairs would remain within its remit.

We note that Screen Australia specifically does not fund news and current affairs. There appears to be no clarity about whether current affairs and journalism would be included within the remit of the new entity, and / or whether current affairs and journalism would be supported elsewhere. Current affairs and journalism are particularly important, noting that the news media platforms have been impacted by advertising losses as badly as broadcasters. NZ On Air's support is currently relatively modest but important in the support of one-off journalism/documentary projects, current affairs and investigative journalism, and reporting on public institutions. This support should continue to cover the stories that matter, to play its important role in democracy, and to serve a population at the mercy of misinformation spread on platforms over which there is no control.

Platform funding complexities: NZ On Air provides vital funding to public media platforms including RNZ, Pacific Media Network, community access radio, and media accessibility services. The document does not provide clarity about where funding for platforms might move to and how they would be monitored. We submit that further thought is required here if they are to be moved. We do note that there is the acknowledgement that these platforms could remain with the merged entity and submit, in lieu of a clear strategy and alternative, this is the most pragmatic approach.

We would suggest that there is value in having one agency with a view across the various public media platforms, with an understanding of the challenges and opportunities these platforms face. The relationships held across the range of sectors (TV broadcasters, radio, news media, community media, screen production, music, game development) are NZ On Air's strength. This breadth of relationships has enabled NZ On Air to be the agile organisation it is – allowing us to very quickly pivot to embrace delivery in new areas – PIJF and the GDSR, for example. The provision of this operational funding is not competing with the other activities. In fact, it is currently delivered efficiently, taking up minimal resources that are also utilised for the bulk of the time on delivering contestable funding

Implementation challenges: Any merger would require careful planning to minimise disruption to the sector during a period of significant economic challenge and upheaval. Staffing restructures, technology integration, branding, and policy development all present potential complications. The behind-the-scenes management of contracts and payments differs significantly between the agencies and would require thoughtful integration.

Funding efficiencies: Both agencies are currently run efficiently, and any administration savings are likely to be relatively modest. The costs of a merger including re-branding, relocation, IT integration, redundancy etc, need to be carefully weighed against these modest savings.

Purpose alignment: NZ On Air and NZFC currently have distinct aims and focus areas. A consolidated entity would need a coherent purpose that balances public media objectives (serving diverse local audiences) with economic interests (international exports, inbound productions). This strategic alignment should be the foundation of any structural change.

While some argue that merging would create a single focus on screen content, many of these considerations could be addressed through thoughtful design of the new entity to have a broader 'media content' mandate. The non-screen functions could be preserved and even strengthened within a larger organisation with greater resources and broader reach.

Strategic Opportunity

Rather than viewing structural change primarily as a response to problems, there is an opportunity to create a world-leading approach to creative industry development, which is aligned with the vision of the draft Creative and Cultural Strategy *Amplify*, for New Zealand to be seen as a global creative powerhouse. A thoughtfully designed entity could:

1. Develop integrated pathways for talent across all formats and platforms
2. Create more flexible funding models that prioritise storytelling excellence and audience impact over traditional media format definitions, enabling creators to develop content that flows naturally across platforms, established and emerging
3. Build stronger international partnerships and export strategies
4. Leverage New Zealand's compact creative ecosystem to create and fund unique cross-pollination – i.e. games + music + series
5. Provide more coherent funding support throughout the content lifecycle from early-stage development through to marketing and distribution.

Do you prefer another option to address this issue?

As noted above, the loss of advertising revenue has destabilised the local media leading to mass job losses and loss of important journalism that holds power to account, reduced demand for new local screen productions (undermining the production sector and losing content from local screens) impacted radio stations' appetite for breaking new local songs (reducing the percentage of local music on air), and increased demand on funds from NZ On Air.

We submit that measures to level the playing field for local media versus global giants, or somehow mitigating the significant loss in income for local platforms must be a priority. It's not for us to suggest how this should be achieved, and it is true this is a complex issue. However, the instability of local platforms has a direct impact on the amount of local content (journalism and screen content in particular) New Zealand audiences can consume. NZ On Air can commission content to exist on a wide range of platforms, including global video sharing and streaming services, but local platforms still have the biggest commitment to local content.

The paper notes two options that were considered but not advanced. The first was:

To retain both entities, but modernise and clarify their statutory mandates, and encourage more aligned operations and coordinated oversight (for example at Board and Ministerial level). This was not preferred as duplication would continue, including due to ongoing media and content production convergence.

We submit that there is much that could be done through intentional and purposeful collaboration. In practice our two agencies communicate openly and regularly on our work in areas in common that include industry development, research and insights.

More can be done in areas such as international finance and co-production, shared services and ultimately, content funding. Having two agencies does not necessarily mean duplication of effort. In fact, the agencies have shown that by working together we can achieve more.

Te Puna Kairangi (The Premium Production Fund) produced premium drama and documentaries that have been both domestically and internationally acclaimed. Both agencies are also involved in the NZSPR, in so far as NZFC administers it, and NZ On Air can support projects with its own funding, alongside the rebate. We also jointly invest in relevant industry research, with two significant projects underway and a third in development.

The second option considered and not advanced was:

A consolidated entity focused exclusively on supporting screen content and the screen sector, which would involve moving music funding to another entity. This option was not preferred as it wouldn't accommodate funding for other media, like podcasts and non-audiovisual news and current affairs. It also wouldn't recognise wider links and trends in convergence between different forms of media (i.e. beyond screen content).

We agree that taking a singular screen content approach is too reductive. It doesn't accommodate the funding of other content (currently supported by the agencies) and furthermore reduces the ability to take a holistic view across content creation (screen, music, podcast, game sector etc), not to mention future technologies. We note that music funding is specifically recommended to stay with the merged entity, and we endorse this.

We acknowledge that there are other entities that support contemporary music and musicians. However our historic funding of music has grown over time through the support of the NZ On Air Board, and has expanded into areas such as support and funding of sync licensing of New Zealand music into funded local screen content – an obvious extension of funding and value creation for an agency that has a view across both sectors.

Do you think the proposed consolidated entity should retain all of the functions currently performed by both the Film Commission and NZ On Air? Why/why not?

If a new consolidated entity is to be established, in lieu of any clear alternatives we believe it should retain all functions of both entities. NZ On Air has tangible examples of the strategic value in being involved across a range of media. New Zealand songs can break-through by being included in an online game or piece of screen content. In Youth and Children's content in particular there are very strong established crossovers between music and screen content. Skills between screen and games production are very transferable. Our audience research gives an overview of all types of media content audiences engage with. So that as we see the current rise in popularity of podcasts for example, we can direct funds towards supporting more podcasts.

And by supporting vital public media platforms and services, we understand some of the most difficult-to-reach or engage audiences (s.36(c) Broadcasting Act). Our depth of understanding of content outcomes adds meaning to the operational funding of these services – it is not just funding to run a platform or service but to provide a type of content not seen elsewhere for a hard-to-reach audience.

It would be difficult for any other entity to provide this oversight and efficient management across these different but inter-connected parts of the media. Removing some platforms and services would create 'orphans' that may not receive the same level of careful oversight.

What do you think should happen to any current functions that are not retained by the entity?

There are no functions we think would be better served somewhere else.

NZ On Air is available to expand on any of the matters raised in this submission, and ultimately to work efficiently and proactively to give effect to relevant final decisions.