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**From:** Paul Thompson  
**Sent:** Wednesday, 1 December 2021  
**To:** Registrar  
**Subject:** NPA Provisional Authorisation

Dear Registrar

Thank you for the opportunity to make a submission on the “appropriateness of allowing NPA to give effect to the proposed collective negotiations while the Commission considers its application for authorisation (ie, on the **provisional** authorisation).”

I wish to make the following points:

- RNZ sees merit in allowing New Zealand news media to have the option to bargain collectively with the platforms. Put simply, this would “even the playing field” in any negotiations with these global giants that have such an upper hand in terms of data, reach, IP and market power.
- But the application as it is worded excludes some news media, including RNZ.
- This seems arbitrary and poses the risk of a “closed shop” being created that would potentially disadvantage those not allowed to join the collective.
- The widest benefits to the public would flow from a “broad church” approach that gives all accredited New Zealand news media the option of joining this collective or, if they choose, an alternative collective.
- We think this matter should be considered carefully before provisional authorisation is granted.

Sincerely

Paul Thompson  
Chief executive and Editor-in-Chief  
RNZ

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