



Commission

Licence Renewal Fee Methodology

Consultation Document

Consultation

Publication date: 28 October 2021

Closing date for responses: 25 November 2021

Reference Number: 6/2021

About this document

The Telecommunications Regulatory Commission (**Commission**) is a statutory body with responsibility for development and regulation of the telecommunications services industry in the British Virgin Islands.

Under section 6(e) of the Telecommunications Act, 2006 (**Act**) the Commission is responsible for determining applications for licences for any of the purposes specified in the Act. Furthermore, section 6(j) empowers the Commission to collect all fees and any other charges payable to the Commission under the Act.

In this document, the Commission outlines:

- Principles applicable to the determination of fees;
- Examples of principles as applicable in other jurisdictions; and
- Our proposed methodology for determining the licence renewal fee.

The proposed fee methodology will be applied to renewal of licences for the operation of telecommunications networks providing telecommunications services in the British Virgin Islands, which are due for renewal in 2022.

We are publishing this consultation document to provide our stakeholders – operators, the public and other interested parties – with the opportunity to comment on our proposed fee methodology for the renewal of licences.

Contents

- About this document 2
- Instructions for submitting a Response 4
 - Cover sheet for response to a Commission consultation 5
- Introduction..... 6
- The Legal Framework 7
 - Legal Provisions 7
- Fee Methodologies..... 8
 - General Principles 8
 - Bahrain 8
 - Bermuda 9
 - Guernsey 9
 - Jamaica 10
 - Trinidad and Tobago 10
- Proposed Methodology for the BVI 12
 - Renewal Activities 13
- Next Steps..... 14
- Consultation Questions 15
- Annex: Table of Renewal Procedure Actions 16

Instructions for submitting a Response

The Telecommunications Regulatory Commission of the British Virgin Islands (**Commission**) invites comments on this consultation document from all interested parties. Comments should be submitted by 25 November 2021.

We strongly prefer responses to this document to be sent by email to consultations@trc.vg (indicating the subject: "Consultation on the Licence Renewal Fee Methodology". Alternatively, responses may be sent to the address (or the P.O Box number) set out below:

Consultation on the Licence Renewal Fee Methodology – Telecommunications Regulatory Commission, P.O. Box 4401 or 27 Fish Lock Road, 3rd Floor Road Town, Tortola, British Virgin Islands VG 1110.

Responses from corporate bodies (legal persons) should include:

- the name of the company/institution/association/other organisation;
- the name of a principal contact person; and
- full contact details (physical address, postal address, telephone number, fax number and email address).

Responses from individual (natural) persons, should include name and contact details (including email).

We have produced a cover sheet for responses (see below) and would be very grateful if you could send one with your response. This will speed up our processing of the responses and help to maintain confidentiality where appropriate.

In the interest of transparency, the Commission will make all submissions received available to the public, subject to the confidentiality of the information received. The Commission will evaluate requests for confidentiality according to relevant legal principles.

Respondents are required to clearly mark any information included in their submission which they consider to be confidential and provide reasons why that information should be treated as such. Where information claimed to be confidential is included in a submission, respondents are required to provide both a confidential and a non-confidential version of their submission. The Commission will determine whether information claimed to be confidential is to be treated as such and, if so, will not publish that information. In respect of information that is determined to be non-confidential, the Commission may publish or refrain from publishing such information at its sole discretion.

Once the Commission has received and considered responses to this consultative document, it will deliver the final statement on the Licence Renewal Fee Methodology, which will be published on the Commission's website.

Cover sheet for response to a Commission consultation

BASIC DETAILS

Consultation title: To
(Commission Contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

CONFIDENTIALITY

Please tick below which part of your response you consider is confidential, giving your reasons why

Nothing Name/contact details/job title

Whole response Organisation

Part of the response Details of Confidential Information

If you want part of your response, your name or your organisation not to be published, we can still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that the Commission can publish. However, in supplying this response, I understand that the Commission may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, the Commission can disregard any standard email text about not disclosing email contents and attachments.

The Commission seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

Introduction

- 1.1 The Commission is the independent regulator for telecommunications in the British Virgin Islands, established in 2007 in accordance with the Act. Our mandate is to implement the Government's policy with respect to telecommunications as set out in the Telecommunications Liberalisation in the British Virgin Islands.¹ Our principal statutory functions are set out in section 6 of the Act.
- 1.2 Under section 6(e) of the Act the Commission is responsible for determining applications for licences for any of the purposes specified in the Act. Furthermore, section 6(j) enables the Commission to collect all fees and any other charges payable to the Commission under the Act. These include, among others, the fee to be paid for renewal of a unitary licence.
- 1.3 In accordance with these statutory obligations, *inter alia*, this document describes the methodology that the Commission is proposing to use to determine the Licence Renewal Fee (**Fee**).
- 1.4 The Licence Renewal Fee Methodology (**Methodology**) will assist the Commission in deciding the appropriate principles to be used for determining the Fee. Determination of the Methodology is a step in assessing the application fee as applicable to the renewal of unitary licences. The current unitary licence includes a provision at Article 5.5, which specifies "*the fees payable for any renewal period shall be agreed upon between the Commission and the Licensee at the time the renewal is granted.*"
- 1.5 The Fee has not yet been agreed with any of the licensees seeking, or likely to seek, renewal of their unitary licence. Notwithstanding this, the Commission believes it appropriate to develop a consistent methodology that would lead to a licence renewal fee that is consistent across all unitary licence holders.
- 1.6 The Commission has adopted six essential principles of regulation consistent with international standards and best practice, namely, accountability, focus, predictability, adaptability, efficiency and balance. We are confident that that the proposed Licence Renewal Fee Methodology in this document is complementary to these principles.

1

http://www.trc.vg/images/attachments/040_G00050_Telecommunications%20Liberalisation%20In%20The%20British%20Virgin%20Islands.pdf

The Legal Framework

The Commission is guided by its statutory remit in developing the Licence Renewal Fee Methodology, notably the provisions that are outlined below.

Legal Provisions

2.1 As a statutory body, the Commission is required to perform certain functions set out in section 6 of the Act.

2.2 Notably, section 6(d) of the Act specifies that:

“the Commission shall be responsible for the regulation of licensees and authorisation holders and for ensuring fair competition among licensees and all other operators of telecommunications networks or providers of telecommunications services.”

2.3 Section 6(e) of the Act specifies that the Commission is responsible for determining applications for licences for any of the purposes specified in the Act. Additionally, section 6(j) of the Act enables the Commission to collect fees and other charges payable to the Commission and section 6(r) of the Act obliges the Commission to promote the systematic development of telecommunications throughout the Virgin Islands.

2.4 Article 5.5 of operators’ licences for the provision of telecommunications networks providing telecommunications services in the BVI specifies that ‘*the fees payable for any renewal period shall be agreed upon between the Commission and the Licensee at the time the renewal is granted.*’ In this regard, it is understood that a fee for licence renewal is to be charged and collected by the Commission.

2.5 As Statutes are to be read as a whole, the Commission must have due regard of its statutory duties in all of its activities, including when setting the fees and charges over which it has some discretion and when determining the methodologies for assigning its costs to its licensees and authorisation holders. A fair and equitable method for assigning the Commission’s costs to licensees and authorisation holders could aid in achieving the objectives of the Act.

2.6 The Commission considers it judicious to consult on the Licence Renewal Fee Methodology pursuant to section 4(1) of the Telecommunications Code (Part 1) (Public Consultations and Public Hearings) Guidelines, 2010, which states:

“(1) The Commission shall hold a public consultation on any matter prescribed by the Telecommunications Act, 2006 and may publicly consult on any other matter that could, in the opinion of the Commission, have a significant effect on the telecommunications sector of the Virgin Islands or a significant part thereof including any matter that could have a significant effect on the rights and obligations of users of telecommunications services.”

Fee Methodologies

General Principles

- 3.1 Every jurisdiction adopts a licence fee structure tailored for its specific circumstances and to achieve its statutory objectives. These can vary considerably from country to country and this diversity is reflected in the fee structures applied across the world. However, operating licence and frequency authorisation fees tend to be determined using one or more of the following three principles:
 - 3.1.1 Recovery of regulatory costs – this is based on a measure of the costs incurred in regulating licensees and the sector or managing spectrum. It can be either related to discrete activities or to the overall costs of the relevant authority.
 - 3.1.2 Efficient allocation of public resources – this is to promote the efficient use of public resources such as spectrum and numbering.
 - 3.1.3 Reflection of economic value – this is to reflect the fact that operating licences and spectrum number resources have economic value, and are used to generate profit, for commercial enterprises.
- 3.2 Not all jurisdictions have explicitly outlined the principles they apply in determining their operating licence and frequency authorization fees. Some of those that have, which we will be including in this document, are Bahrain, Bermuda, Guernsey, Jamaica and Trinidad & Tobago.

Bahrain

- 3.3 The Telecommunications Regulatory Authority (**TRA**) of the Kingdom of Bahrain published a “Schedule of Fees in 2010”² that, among other things, addressed the key principles that the TRA would apply in setting the fees imposed on licensees. The TRA signalled, among other things, that:
 - a. they intended to reduce the annual turnover-based fee by increasing revenues from other fees and charges;
 - b. fees were to cover the costs of the Authority;
 - c. fees charged for access to scarce resources are to be proportional to the amount of scarce resource consumed, or denied to other users; and
 - d. revenues from the use of scarce resources are to be set at a level which encourages efficient use of the resource.³
- 3.4 Following a consultation in 2015, the TRA published a “Schedule of Fees Regulation,”⁴ in which it noted the eight factors that it would consider in setting fees.
 - 3.9. *The following factors are accounted for determining Fees:*
 - 3.9.1. *The need to promote easy market entrance, foster competition as well as efficient use of national scarce resources;*

² TRA Schedule of Fees for 2010, Resolution No. 3 of 2010, 28 July 2010.
https://tra.org.bh/Media/Pdf-Section/TRAScheduleofFees2010Final_en2.pdf

³ TRA Schedule of Fees for 2010, pp. 5-6.

⁴ https://tra-website-prod-01.s3-me-south-1.amazonaws.com/Media/Documents/Regulations/20191017215646871_swvrvrcj_wi1.pdf

- 3.9.2. *The impact of the new Fees on consumers and operators;*
- 3.9.3. *The need to reflect, as appropriate, the real value of the spectrum and numbers in the Bahraini market;*
- 3.9.4. *Conformity with the Telecommunications Law;*
- 3.9.5. *Spectrum availability in particular frequency sub-bands, including those which are highly demanded;*
- 3.9.6. *The need to collect sufficient revenues from the sector in order to fund Authority' operations and activities;*
- 3.9.7. *The current national numbering ranges and the expected growth; and*
- 3.9.8. *The various economic aspects that could be affected by the new Fees structure.*

3.5 These factors reflect the three principles for setting fees described above, namely, “cost recovery,” “efficient allocation,” and “economic value.” They also reflect the need to consider the impact of fees on competition and on stakeholders in the market.

Bermuda

- 3.6 The principles for setting fees for operating licences and frequency authorisations in Bermuda are set out directly in the legislation establishing the Regulatory Authority (**RA**). Fees consist of “Regulatory Authority Fees”⁵ and “Government Authorisation Fees”.⁶
- 3.7 The Regulatory Authority Fees are intended to recover from sector providers the RA’s budgeted costs of regulating the sector, and include “service fees” for specific functions and activities, and “general regulatory fees” to cover the RA’s remaining direct and indirect costs.⁷ The general regulatory fee has typically been determined as a percentage of the provider’s turnover.
- 3.8 The Government Authorisation Fees are not intended to be cost-based, as the RA’s costs are already covered by the RA Fees. However, in proposing them to the Government, the RA is required to take into account the Regulatory Authority Fees imposed on the industry, the likely effect of the proposed fees on investment and employment in the sector, the extent to which the proposed fees will promote Bermudian ownership and employment, and any other factors it considers relevant. The equivalent of a licence fee is set as a percentage of turnover, while the equivalent of a spectrum fee is set as a price per MHz per year (with a pro-rating factor to reflect that lower band spectrum is more valuable than higher band spectrum).⁸
- 3.9 The RA Fees, therefore, apply the cost-recovery principle, and use service fees to allocate as much as possible the costs of regulation to those causing the costs to be incurred.

Guernsey

- 3.10 In Guernsey, licence fees are intended to cover the costs of regulation of the Guernsey Competition and Regulatory Authority (**GCRA**). In 2014, the GCRA determined that those costs would be apportioned among licensees using annual licence fees based on a simple percentage of “relevant

⁵ Section 44 of the Regulatory Authority Act. <https://www.ra.bm/documents/regulatory-authority-act-2011/>

⁶ Section 52 of the Regulatory Authority Act.

⁷ The RA is a multi-sector regulator. Costs directly related to regulating a sector are charged to participants in that sector, while costs that cannot be attributed directly to a sector are allocated to the sectors.

⁸ See for example, page 25 of the Schedule to the Government Fees Amendment Regulations 2016.

<https://www.ra.bm/documents/government-fee-amendment-regulations-2016/?wpdmdl=1675&refresh=610adac11353a1628101313>

turnover.” Relevant turnover is essentially total revenue less revenue from certain services which telecommunications licensees are not required to provide.⁹

3.11 The GCRA’s licence fees, therefore, clearly reflect the cost-recovery principle described above.

Jamaica

3.12 The Telecommunications Act in Jamaica is also explicit regarding the principles to be applied in setting fees paid by licensees. For instance, under section 12 of that statute, licence application fees are to be determined by the Minister in such amount “*as is necessary to recover the costs of processing the application.*” Under section 16(2), the Office of Utility Regulation is authorised to impose an annual regulatory fee on holders of carrier licences and service provider licences expressly limited to “*a reasonable estimate of the costs which will be incurred by the Office in relation to the regulation of the specified services to which the licences relate.*” These have been implemented in the Telecommunications (Regulatory Fees) Regulations¹⁰ as a revenue-based fee subject to minimum fees.

3.13 Similarly, section 26 provides that the annual “*spectrum regulatory fee shall be such amount as the Minister considers necessary in order to cover the reasonable operating costs incurred by the [Spectrum Management] Authority in relation to spectrum licences.*”

Trinidad and Tobago

3.14 In 2014, the Telecommunications Authority of Trinidad and Tobago (**TATT**) consulted on a revision to its authorisation framework to ensure that it would comply with the terms of the Economic Partnership Agreement between Trinidad and Tobago (and the 14 other members of the Caribbean Forum) and the European Community. In its “Draft Revised Authorisation Framework for the Telecommunications and Broadcasting Sectors of Trinidad and Tobago” document issued in September 2014, the TATT included the following statement on the development of fees for the communications sector.

Statement on the determination of fees:

1. *In developing a fee structure for concessions, service authorisations and licences and fees levied on all other authorised service providers, the Authority will ensure that:*

- *fees imposed on concessionaires and licensees do not create significant barriers to entry or impair competition;*
- *the efficient use of scarce resources is encouraged by applying usage charges that reflect the economic value of those resources.*

2. *All fees levied shall be in accordance with the Fee Regulations using the methodology prescribed in the Fee Methodology Document¹¹*

⁹ Spectrum usage charges (in Guernsey), non-telecoms related business, services carried out in their entirety outside the Channel Islands’ legal jurisdiction, Data Centre Hosting and services (although not connectivity services provided to data centre customers), mobile handsets and accessories, consultancy, sales of customer premises equipment (CPE) & customer wiring, managed services, and Call Centre Services.

¹⁰ https://moj.gov.jm/sites/default/files/laws/The%20Telecommunications%20Act_0.pdf

¹¹ Draft Revised Authorisation Framework for the Telecommunications and Broadcasting Sectors of Trinidad and Tobago, September 2014, at page 42.

- 3.15 The TATT implemented a revised Telecommunications Fees Methodology in 2017 consistent with this statement of principles. After reviewing its objectives under its Telecommunications Act and the statutory requirements for licence fees and spectrum usage charges, the TATT noted:

It follows that the fees and charges structure for authorisations should result in charges which:

- i. Ensure that the Authority's costs are recovered;*
- ii. Reflect the market value of spectrum and numbers in a manner which:*
 - a. encourages investment and offers end users reasonable prices for quality resources,*
 - b. ensures ubiquitous access to telecommunications and broadcasting resources in the country; and*
- iii. Do not place on businesses and entrepreneurs unreasonable barriers to entry into the market.¹²*

- 3.16 In other words, in addition to considering the “cost recovery” and “economic value” principles for setting fees, the TATT would take into account the effect of any fees and charges on meeting its objectives under the Act and on the market in general.

https://tatt.org.tt/Portals/0/Documents/2014%20Documents/Revised%20Authorisation%20Framework%20v2_FINAL.pdf

¹² Telecommunications Fees Methodology – Final Document, TATT: 2/3/43,28 August 2017, at page 6.

https://tatt.org.tt/DesktopModules/Bring2mind/DMX/Download.aspx?Command=Core_Download&EntryId=1103&PortalId=0&TabId=222

Proposed Methodology for the BVI

- 4.1 It is international practice to apply one or more of three basic principles when setting fees for operating licences and frequency authorisations. Those principles are, as indicated above, recovery of regulatory costs, efficient allocation of public resources, and reflection of economic value.
- 4.2 It is also international best practice to set fees and charges in light of the regulator's statutory mandate. Accordingly, the Commission's actions and decisions, including in relation to telecommunications networks and services licence fees, should be aimed at achieving those objectives.
- 4.3 The Commission particularly considers that the licence fees in this regard should promote the objectives of ensuring fair competition and promoting the systematic development of telecommunications throughout the jurisdiction.
- 4.4 The cost recovery principle is believed to be the most relevant to determining the appropriate licence renewal fee as the process of reviewing the licence renewal applications and the renewal procedure outlined in the current unitary licences will require a considerable amount of the Commission's time and resources. While the licensed entities are known by the Commission, the renewal procedure requires the Commission to review the record from the prior 14-year period and to assess the licensee's past performance and compliance with statutory and licence obligations. It is proposed that the Commission apply the principle of costs recovery to the determination of the licence renewal fee, so as to ensure transparency and fairness of the regulatory fee regime, by ensuring that entities who cause the Commission to undertake specific activities bear the cost of those activities.
- 4.5 The principle of efficient allocation of resources appears to be less applicable to determining the fee for operating licences. These are not typically considered to be a scarce resource, unlike spectrum and numbers which are assigned to one person to the exclusion of all other persons. Insofar as the Commission could, in principle, issue additional operating licences, there is not the same need to ensure operating licences are used as efficiently and effectively as possible through the licence fee structure. Specifically, while the Commission will want to ensure that operating licences are used to the fullest extent possible, in order to bring the benefits of competition, new services and better prices to consumer in the BVI, the design and imposition of a licence renewal fee does not seem to be an effective way for this to be accomplished.
- 4.6 'Economic value' could be a relevant principle to apply in setting a licence renewal fee, particularly considering that the telecommunications sector generated \$61million in revenues in 2013, which supports the assertion that a unitary licence is valuable. However, it is the Commission's view that the economic value of the unitary licence is largely reflected through the imposition of the annual royalty fee, which is calculated as a percentage of gross revenue. It is, therefore, unlikely that economic value needs to be a primary consideration when setting the renewal fee to ensure the fees and charges paid by licensees and authorisation holders reflect the value of those licences and authorisations.
- 4.7 Based on the Commission's proposed approach to apply the principle of cost recovery to determine the licence renewal fee, this will involve the Commission assessing the cost of the resources necessary to review an application, including the cost associated with the staff involved in the review, the cost of publishing documents and venue costs associated with the public hearings, as required by the renewal procedures, and any other relevant costs. Once these costs have been

determined, a proposed renewal fee can be set for agreement with the licensees. While each licensee's application and circumstances will differ, the Commission is of the preliminary view that a similar level of effort will be required for all applications for renewal of a unitary licence and, therefore, anticipates that the same Fee will apply to all operators seeking renewal of their unitary licences in 2022.

- 4.8 Having identified the level of the costs required to be covered by an application fee, the Commission will then determine whether a fee set at that level would assist it in achieving its objectives under the Act. While the Commission must consider its costs, it also has a strong interest in ensuring its application fees promote fair and effective competition and the development of telecommunications across the country, or at the very least do not hinder achieving those objectives. The Commission anticipates assessing whether such an adjustment is necessary only after it has determined, at the conclusion of the current consultative process on the Methodology, the relevant renewal procedure actions that will be taken into account in setting the Fee.

Renewal Activities

- 4.9 The Commission has commenced the process of determining the activities necessary for the renewal of a unitary licence and the costs associated therewith. Please see the Annex for a table of key actions and related key performance indicators in this regard.

Next Steps

- 5.1 After the Commission has determined the methodology for setting the Fee, including the relevant costs, the apportionment of those costs, and any required adjustments, as described in the preceding section, the Commission will communicate in writing to each applicant the proposed Fee for renewal of their unitary licence.

Consultation Questions

Based on the above, the Commission invites all interested parties to submit their comments, with supporting evidence, on the following questions.

1. Do you believe that the Commission has considered appropriate countries in demonstrating the principles used for determining fees for telecommunications operating licences? If you do not, please provide examples of other countries and explain in detail the principles and processes applied by the relevant authorities in those countries to determine telecommunications operating licence fees.
2. What are your views on the Commission's proposal to use the principle of cost recovery to determine the appropriate fee for renewal of unitary licences? If you disagree with the principle of the principle of cost recovery, please indicate which principle you believe is more appropriate and why.
3. Do you agree with the Commission's preliminary view that a similar level of effort will be required for all applications for renewal of a unitary licence and, therefore, the same Fee should apply to all operators seeking renewal of their unitary licences in 2022? If you do not, please indicate how you believe the fee should be apportioned, explaining your reasoning in detail along with providing supporting evidence for your response.
4. Are there any other concerns, interests or obligations that the Commission should consider including in determining the appropriate methodology to use for the licence renewal fee? If so, please explain your reasoning in detail, along with providing supporting evidence, as may be applicable.
5. Do you agree with the steps outlined in the Annex that the Commission has outlined as applicable to the licence renewal process?
6. Please provide your views on any other matters you consider relevant to this consultation.

Annex: Table of Renewal Procedure Actions

Key Action	Key Performance Indicators
Decide on Renewal Application Form	Review current application form for public suppliers Determine whether amendments are necessary Submit amendments for drafting Draft new application form
	Draft note to Board informing them of the Commission's findings in relation to an application form for renewal Draft decision paper for Board approval Submit decision paper to Board
	Draft notice of consultation Publish notice of consultation
	Publish application form
	Consultation on new application form
	Review operators' comments on Consultation of the new application form & amend application form accordingly
	Publish Final Report on New Application Form
New Terms & Conditions for Renewal Licences (based on Art 18 - Amendment Licence)	Review current unitary licences Submit amendments for drafting Draft new licences
	Draft note to Board informing them of the Commission's findings in relation to amendments for a revised licence Draft Decision paper for Board approval Submit Decision paper to Board
	Arrangements for Public Hearing - contacting the location to ensure availability, choosing the type of room, completing the booking form and sending it via email
	Draft notice to adopt Directive Publish notice to adopt Directive
	Draft Directive on Proposed Licence amendments
	Consider operator comments on Directive
	Publish Directive on Proposed Licence amendments
	Public Hearing (Commission and Operator)
	Transcribing of Public Hearing Report of the Public Hearing
	Draft Final Statement on Licence amendments
	Publish Final Statement on Licence amendments
	Notice on agreed Licence amendments
	Determine Licence Renewal Fee
Determine methodology for calculation of licence fee	
Draft note to Board informing them of the Commission's findings in relation to the renewal fee methodology & Decision paper for Board approval; Submit Decision paper to Board	
Draft notice of consultation on renewal fee methodology Publish notice of consultation on renewal fee methodology	
Draft consultation document on renewal fee methodology Publish consultation document on renewal fee methodology	
Consultation on new renewal fee methodology	

	Review operators' comments on Consultation of renewal fee methodology & amend consultation document accordingly
	Publish Final Report on Renewal Fee Methodology
	Arrangements for Discussion between the Commission & operators - contacting the location to ensure availability, choosing the type of room, completing the booking form and sending it via email
	Discussion of renewal fee (include fee methodology) between the Commission & operators
	Report of the Discussion of renewal fee (include fee methodology) between the Commission & operators
	Review Operators' comments on Discussion of renewal fee (include fee methodology) between the Commission & operators & amend accordingly
	Publish Final Report on New Renewal Fee
Renewal Procedure	Receive application form from operators for renewal - Application Receipt, signing in and out of forms
	Review application forms for renewal for each operator - operator submits everything & Managers' discussion of the form & the development of the RFIs
	Draft and issue RFIs to operator
	Receive and consider responses to RFIs Draft and issue follow-up RFIs as necessary
	Draft Notice of Licence Renewal Publish Notice of Licence Renewal
	Provide list of non-compliance areas per operator
	Review files for operator Prepare template for Evaluation Report Draft Evaluation Report
	Submit Draft Evaluation Report to Licensee within 90 Working Days of receipt of Application
	Review operator's comments on Evaluation Report Amend Evaluation Report in light of operator's comments
	Submit Final Evaluation Report to Licensee within 90 working days of receipt of application Publish Final Evaluation Report
	Arrangements for Public Hearing - contacting the location to ensure availability, choosing the type of room, completing the booking form and sending it via email
	Draft Notice of Public Hearing Publish Notice of Public Hearing
	Public Hearing (Commission and Operator)
	Transcribing of Public Hearing Report of the Public Hearing
	Written Decision of Licence Renewal within 120 Working Days of receipt of Application. If Commission's Decision is not made within 120 Working Days of receipt of Application then the Commission's Decision can be rendered no later than one year from the receipt of the renewal application by the Commission
	Notify Licensee in writing of the Commission's Decision