

⑤ Authorization fees



KEY INSIGHTS

- Various GRP principles are relevant for the determination and levying of fees for services authorizations. The aim is to ensure that these fees do not present unnecessary obstacles to market entry, and contribute to a fair, predictable and accessible regulatory environment for obtaining permission to supply services.
- While the GATS does not address the issue, the SDR Disciplines – like many recent services PTAs – require that authorization fees be “reasonable, transparent, based on authority set out in a measure, and do not in themselves restrict the supply of the relevant service”.
- At the domestic level, fees vary significantly by sector and authorization type, and various common GRP aspects can be observed across sectors. These include the transparency of fees, referring to whether amounts are clearly published, including with an indication of their legal basis, their rationale and modifications over time (ideally online); their reasonableness; and ensuring that fees reflect actual regulatory costs rather than acting as *de facto* market barriers. The availability of electronic payment methods is also significant.

Key features

Fees and charges levied in connection with the supply of services impact the cost of doing business and may affect how easily new or smaller firms can enter, compete, and exit without facing undue barriers. While there is significant variation at the domestic level across sectors, a number of GRP principles guide the determination and levying of fees for services authorizations.¹

Firstly, it is a recognized element of GRP that authorization fees be transparent. Publication of fees, or their methods for calculation – alongside an explanation of their legal basis – provide service suppliers with greater predictability in their expenses, which is crucial for planning and cost forecasting of business operations. Particularly important for new suppliers or small enterprises, high fees and/or lack of clarity around their amount can constitute a barrier to entry, thereby reducing competition and limiting the diversity of the services on offer.

Another GRP principle relates to how reasonable authorization fees are, particularly in relation to the cost of processing applications or other regulatory activities. In this respect, the objective is to ensure that suppliers are paying for the actual administrative service rendered. This principle of proportionality helps prevent fees from being set at excessively high levels that could restrict market entry, while recognizing that administrations retain the right to levy taxes on service suppliers.

Furthermore, with the increasing reliance on electronic tools for authorization procedures, the possibility to pay applicable fees electronically is, nowadays, also progressively emerging as a GRP principle.

GATS, SDR Disciplines and other relevant trade agreements

The GATS does not specifically include an obligation on fees in relation to authorization for service suppliers. Nevertheless, Article VI:1 requires that, in sectors with commitments, “measures of general application are administered in a reasonable, objective, and impartial manner”. While this obligation influences how fees are administered, it is questionable whether the determination of fees also falls within its scope.

The SDR Disciplines, on the other hand, contain substantive obligations regarding authorization fees for service suppliers:²

Each Member shall ensure that the authorization fee^{FN} charged by its competent authorities are reasonable, transparent, based on authority set out in a measure, and do not in themselves restrict the supply of the relevant service.

^{FN}: Authorization fees do not include fees for the use of natural resources, payments for auction, tendering or other non-discriminatory means of awarding concessions, or mandated contributions to universal service provision.

It should be noted that the SDR Disciplines do not positively define the phrase “authorization fee”. Rather, the footnote to this paragraph excludes certain fees from the scope of application of this obligation, namely, fees linked to the use of natural resources, payments for auction, tendering or other non-discriminatory means of awarding concessions, as well as mandated contributions to universal service provision.

Moreover, the SDR Disciplines do not distinguish between an authorization fee and fees charged for processing of applications. Authorization fees, as they may include application fees, have a broader scope: application fees include fees for the costs of issuing and maintaining the authorization, as well as any ongoing monitoring or compliance activities required by the regulatory authority, such as supervision, inspections, or annual compliance reviews.

Thus, the scope of authorization fees does not exclude fees that are paid after an application for authorization has been processed and granted, when those fees serve the purpose of paying for costs incurred in the context of maintaining or renewing such authorization. Additionally, based on the broad definition of authorization in the SDR Disciplines, authorization fees would also include fees that are charged to fulfil certain preconditions to obtain authorization, e.g. fees charged by professional associations to which membership is a continuing requisite for maintaining a license to exercise a profession in the country.

One key obligation set out in the SDR Disciplines relates to the transparency of authorization fees. Transparent fees bring consistency and predictability, as service suppliers need to know in advance what they

will be charged, so that the fees can be factored into business plans without unexpected changes or hidden increases or charges.

In light of this, there are various transparency-related aspects that come into play, such as ensuring that the process for setting and applying fees is clear, accessible and understandable for all stakeholders, including service providers, the general public and other regulatory authorities; providing a detailed explanation of how authorization fees are calculated, including what specific costs they cover; disseminating to the public information about the rationale behind the fee structure; and communicating any changes to fee structures, including in advance, with a clear explanation for the changes.

With respect to transparency, the SDR Disciplines also generally require that information regarding fees is published promptly, or otherwise made publicly available in writing.³ In this context, it is interesting to note that, with respect to goods trade, Article 6.1 of the TFA goes further and specifies that: “this information shall include the fees and charges that will be applied, the reason for such fees and charges, the responsible authority and when and how payment is to be made.” It also provides that “an adequate time period shall be accorded between the publication of new or amended fees and charges and their entry into force, except in urgent circumstances. Such fees and charges shall not be applied until information on them has been published.”⁴ Last but not least, Article 6.1 requires that there is a periodic review of fees and charges, with a view to reducing their number and diversity.⁵

Furthermore, the SDR Disciplines require authorization fees to be “reasonable”. However, it is noteworthy that the reasonability of fees is not benchmarked against costs. Indeed, the SDR Disciplines do not refer to fees being “limited in amount to the approximate cost of services rendered”, as in the corresponding provision of Article VIII:1(a) GATT and Article 3.2 of the TFA. In WTO dispute settlement, the term “reasonable” that appears in other provisions of the agreements has been understood to refer to notions such as “in accordance with reason”, “not irrational or absurd”, “proportionate”, “having sound judgement”, “sensible”, “not asking for too much”, “within the limits of reason, not greatly less or more than might be thought likely or appropriate”, “articulate”,⁶ and not ignoring obvious facts and standard practice.⁷

The use of the reasonability requirement in the SDR Disciplines might be read as allowing for more discretion in fee-setting and providing room for regulatory authorities to depart from a strict linkage to cost, as long as fees remain fair and not excessive. Reasonable fees could also provide coverage for broader cost considerations, such as indirect costs or costs related to future improvements in regulatory oversight.

Another requirement set out in the SDR Disciplines is that fees be “based on authority set out in a measure”⁸; this obligation aims to guarantee that fees have a clearly defined regulatory foundation. It requires a formal specification that the competent authority has the right to levy authorization fees and should ideally also set out the conditions or criteria under which such fees are imposed. The requirement ensures that authorization fees are established through a legitimate process, are consistent with the legal framework, and are therefore subject to review or oversight.

The SDR Disciplines also stipulate that the fees must not in themselves restrict the supply of the relevant service. In a similar vein, it should be highlighted that the SDR Disciplines require that authorization procedures “do not in themselves unjustifiably prevent the fulfilment of requirements”.⁹ The concept that procedures may “in themselves” restrict the supply of a service is already embedded in GATS Article VI:4 (c). The latter sets out that the disciplines on domestic regulation to be developed by WTO members shall ensure, *inter alia*, that “[...] licensing procedures, [be] not in themselves a restriction on the supply of the service”.

In the specific context of fees, such a requirement seeks to ensure that fees do not act as *de facto* market access barriers. This implies that fees should not be excessively high, or fee collection methods overly cumbersome, so that they discourage service suppliers from entering the market or make it financially burdensome for existing suppliers to continue providing their services. In practice, it can be argued that authorization fees that are “reasonable” typically also meet the requirement that they do not in themselves restrict the supply of the relevant service.

It is worth noting that, in the case of financial services, the SDR Disciplines address the matter of authorization fees differently. The provision contained in the Alternative SDR Disciplines differs from the horizontal obligation outlined above and provides that:

Each Member shall ensure that its competent authorities, with respect to authorization fees they charge, provide applicants with a schedule of fees or information on how fee amounts are determined.¹⁰

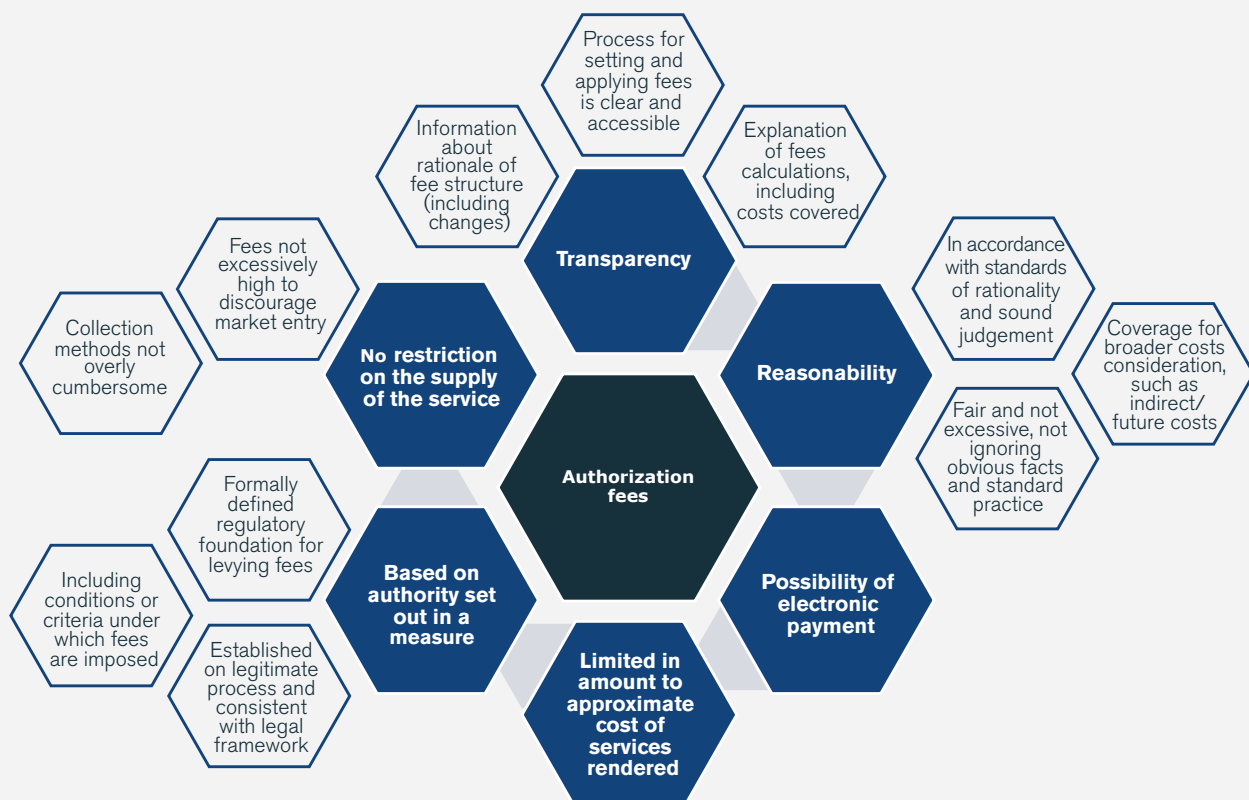
For financial services, therefore, the obligation is limited to a very specific transparency requirement, namely the provision of fee schedules or information of how fees are determined. This type of milder obligation aims to preserve even greater flexibility for financial regulators in the process of determining fees.

The SDR Disciplines do not require competent authorities to provide applicants with the possibility of paying authorization fees electronically. In contrast, such an obligation appears, albeit as a best endeavour commitment, in Article 7.2 of the TFA which says that “each Member shall, to the extent practicable, adopt or maintain procedures allowing the option of electronic payment for duties, taxes, fees, and charges collected by customs incurred upon importation and exportation.”¹¹ Figure 1 provides an overview of the various GRPs in the area of authorization fees.

PTA practice

The majority of PTAs also contain obligations with regard to authorization fees.¹² In contrast to the SDR Disciplines, several of these agreements explicitly limit the obligation of authorization fees to the application stage only, by providing that the fees at issue are those that are “charged for the completion of relevant application procedures” (for example, Article 8.15.7 of 2022 RCEP) or are those “which the applicants may incur from their application” (for example, Article 8.31.2 of 2019 EU–Japan EPA). These agreements frequently replicate the key elements of the SDR Disciplines, meaning that fees are to be reasonable, transparent and do not restrict in themselves the supply of the relevant service.¹³ They also mirror the SDR Disciplines in stipulating that authorization fees “do not include fees for the use of natural resources, payments for auction, tendering or other non-discriminatory means of awarding concessions, or mandated contributions to universal service provision”.¹⁴

Figure 1: GRPs in the area of authorization fees



Source: WTO/World Bank.

Some PTAs, however, reflect a more closely cost-oriented focus. For example, the 2017 EU–Canada CETA provides that “an authorization fee that an applicant may incur in relation to its application for an authorization shall be reasonable and commensurate with the costs incurred.”¹⁵ It is also seen, for example, in the case of the 2016 EU–Georgia Association Agreement (Article 95), the 2014 Switzerland–China FTA (Annex VI, Article 2) and the 2011 Hong Kong, China–New Zealand CEPA (Annex III to Chapter 13).

With respect to transparency, several PTAs contain specific provisions requiring the publication of authorization fees, such as the 2023 UK–Iceland, Liechtenstein and Norway FTA, the 2021 EU–UK TCA, the 2020 PACER Plus, and the 2020 USMCA.¹⁶

It is also worth noting that most PTAs maintain the same obligations on authorization fees across all services sectors, i.e. also including financial services. This means that even those agreements which have separate chapters on financial services (for example, 2017 EU–Canada CETA, 2022 RCEP, 2019 EU–Japan EPA) do not contain a different obligation for fees in this area. One exception is the 2020 USMCA “Financial Services”, whose Article 17:13:7(k) is in line with the obligation contained in the Alternative SDR Disciplines: “financial regulatory authorities provide applicants with a schedule of fees or information on how fee amounts are calculated”. Additionally, the provision sets out the additional safeguard that parties are not to “use the fees as a means of avoiding the Party’s commitments or obligations under [the Financial Services] Chapter”.

Implementation at the domestic level

At the domestic level, governments regulate the issue of fees related to authorization in various ways, depending on the specific characteristics of each sector. An analysis of WTO–World Bank STPD data shows significant diversity in how authorization fees are regulated in terms of amount and structure, reflecting differences in regulatory objectives in different sectors and the intensity of oversight required. Nevertheless, there are various GRP aspects that are common in guiding the determination and levying of fees across sectors. These include, for example, ensuring that fees are transparent, proportionate to regulatory effort and non-discriminatory, that information on fee schedules is published, and that periodic reviews of fee amounts are carried out, including in consultation with stakeholders.

As an example, financial services often involve higher and more complex fee structures due to the sector’s systemic importance, requiring intensive supervision, risk mitigation and prudential oversight. Authorization fees for locally established suppliers typically include fees to cover administrative review costs and license issuance fees payable upon approval, which may vary based on the scope of financial activities. Annual supervision fees may also apply and are calculated either as a flat rate or based on institutional size or risk profile.

A transparent and reason-based approach to regulating authorization fees is exemplified by New Zealand’s Financial Markets Conduct (Fees) Regulations of 2014.¹⁷ In New Zealand, a financial institution license is required for any registered bank, licensed insurer, or licensed non-bank deposit taker in the business of providing one or more relevant financial service, if that service is received by a consumer in New Zealand.¹⁸ The licensing fees are calculated on a cost-recovery basis as the charges are directly linked to the estimated time and resources required by the regulator to assess each application.

In 2024, the basic application fee for a financial institution licence was NZD 1,024.93¹⁹ based on 5.75 hours of estimated time to assess a standard application.²⁰ The fee for each authorized body included in the licence was NZD 614.95²¹ based on an estimated assessment time of 3.45 hours.²² If the assessment time exceeds 6.75 hours, the Financial Markets Authority (FMA) is authorized to charge an additional hourly fee of NZD 178.25, or *pro rata per part-hour*.²³ Furthermore, applications to vary licence conditions are subject to a base fee of NZD 115, plus the same hourly rate of NZD 178.25.²⁴ These fees are clearly outlined on the FMA’s official website,²⁵ and applicants are informed in advance of any additional charges, along with the reasons for those charges.²⁶ License fees²⁷ can be paid online by credit card, debit card, or real time debit at the time of application submission via the FMA website.²⁸

Insofar as professional services are concerned, fees are typically generally administrative in nature and linked to discrete steps in the qualification/authorization process: (i) assessing foreign qualification and recognition, (ii) undertaking examinations and any required bridging or practical training, (iii) admission/licensing/registration, and (iv) ongoing annual fees to maintain the right to practice and ensuring compliance with ethical standards. Such charges are typically framed as cost-oriented,

funding credential checks, assessment delivery, admission processing and regulatory supervision, rather than serving as revenue-raising instruments.

In the specific case of legal services, authorization fees for foreign professionals typically include charges for recognition of foreign qualifications, professional licensing or bar registration fees, as well as fees for local examinations and mandatory training. Additionally, annual fees may also be required for maintaining active licensure. For example, both in England and Wales as well as in Singapore, the authorization pathway for foreign-trained lawyers follows the same basic pattern: (i) assessment/exam fees (Solicitors Qualifying Examination, or SQE, in England and Wales; Part A in Singapore) to cover the delivery of national assessments; (ii) an admission/registration fee payable on being admitted; and (iii) an annual practising-certificate fee to fund ongoing regulation.²⁹

These fees are published online, payable electronically and are framed as cost-oriented administrative fees rather than revenue-raising instruments. Exam fees fund assessment delivery; admission fees cover processing; and practice fees are set to recover the regulator's approved costs (including mandated levies), rather than to generate surplus income.³⁰ In Singapore, the practising-certificate fee is prescribed under the legal framework and supports regulatory and professional functions.

Overall, the structure splits non-refundable processing/assessment charges from post-grant and ongoing fees, aligning payment points with the underlying regulatory costs. In addition to fees related to the individual qualification process, competent authorities in many jurisdictions also levy company-level authorizations and levies. Looking at other professional services, in auditing, audit-firm registration and inspection fees are widespread, while in many jurisdictions, engineering and architecture firms require certificates of authorization.

When it comes to telecommunication services, common licensing objectives include regulating the provision of an essential public service, expanding service networks, establishing a level playing field for competition, supporting consumer protection, generating government revenues, and ensuring the efficient allocation of radio spectrum (i.e. frequencies for various forms of communication such as radio and television) in the public interest.³¹ Correspondingly, fee frameworks in this sector usually comprise two

elements: (i) licence/authorization fees, which are typically cost-recovery (covering regulatory processing and compliance oversight); and (ii) spectrum-related charges, which include one-off spectrum assignment payments (e.g. auction receipts where mobile operators bid for frequency blocks and the highest bidders pay an upfront price to secure usage rights, or administered incentive pricing where regulator sets a fee that reflects the economic value of the spectrum to encourage efficient use, and which, in practice, often generate substantial public revenues) and recurring spectrum management/usage fees, aimed at covering the costs of ongoing spectrum administration and encouraging efficient use.

Framed this way, the mix of licence fees and spectrum charges is a means of achieving the policy objectives above, with cost-recovery applying to regulatory and spectrum-management activities, and assignment payments reflecting the value and efficient use of the spectrum. Authorization fees to establish in the local market typically include payments to the competent authority for the right to operate and offer services, administrative charges to cover the regulator costs associated with managing and supervising use of radio spectrum, and administrative charges to compensate the authority's costs for overseeing other regulatory functions, such as licensing and ensuring compliance with license terms.

The International Telecommunication Union (ITU) considers a best practice to distinguish between different types of fees to help improve transparency, cost-based structure, and efficiency.³² Fees should not impose unnecessary burdens on the sector and should be proportionate to the operational size of the service provider.³³ Furthermore, spectrum fees should be applied on an equitable basis and, ideally, be accompanied by published fee schedules developed in consultation with stakeholders.³⁴

Singapore exemplifies certain GRP aspects in this area. Administered by the Infocomm Media Development Authority (IMDA), Singapore's licensing framework distinguishes between service-based operators (SBOs) and facilities-based operators (FBOs) and applies differentiated and proportionate fees. Foreign and domestic investors seeking to provide telecom services without deploying infrastructure can obtain an SBO (class) licence for a modest one-time application fee of SGD 200.³⁵ For FBOs, which deploy and operate their own telecom infrastructure, Singapore employs a tiered

annual fee model based on the operator's annual gross turnover (AGTO), with fees starting at SGD 80,000 and scaling up to 1 per cent of AGTO for larger operators.³⁶

In addition to licensing fees, the IMDA adopts a cost-recovery approach to spectrum fees. According to IMDA's *Spectrum Management Handbook*, spectrum fees include a one-time application and processing fee, which covers the cost of evaluating the suitability of the assigned frequency, and an annual frequency management fee, which recovers the cost of ongoing regulatory oversight to safeguard frequency use.³⁷ In terms of value, the spectrum application and processing fee is SGD 100 per frequency for commonly assigned frequencies used temporarily or occasionally, and SGD 300 per frequency for all other types, including satellite downlink frequencies.³⁸

An annual frequency management fee is determined based on bandwidth and service type, with clearly defined rates; for instance, SGD 400 for small-band private mobile use³⁹ and up to SGD 29,800 for 10–20 MHz of spectrum.⁴⁰ For high-demand spectrum bands, such as those used for 5G services, Singapore employs transparent and market-based auctions – competitive bidding with published rules and reserve prices so that bidders reveal how much they value

each frequency block, and licenses go to the highest-valuing users.⁴¹ All of these prescribed fees and auction details are published online on the IMDA's website.⁴²

In conclusion, fees are a critical component of authorization processes, and how they are determined and communicated to the public strongly influences the accessibility and predictability of services markets. Domestic fee structures necessarily vary depending on sector-specific regulatory needs and the type of authorization required. Nevertheless, several GRP principles are broadly recognized for the determination and levying of authorization fees – which are also reflected in the SDR Disciplines and various recent services PTAs. These include transparency of fees, namely whether fee amounts are clearly published, including with a legal basis, their rationale and notice of changes (ideally online); their reasonableness and cost-oriented nature, ensuring that fees reflect actual regulatory costs rather than acting as *de facto* market barriers; and the availability of electronic payment methods. Together, these practices help ensure that authorization fees do not become unnecessary obstacles to market entry, and contribute to a fair, predictable and accessible regulatory environment for obtaining permission to supply services.

ENDNOTES

1 For the purpose of this Handbook, and to reflect the scope of authorization fees addressed in the SDR Disciplines, “authorization fees do not include fees for the use of natural resources, payments for auction, tendering or other non-discriminatory means of awarding concessions, or mandated contributions to universal service provision”.

2 SDR Disciplines (WTO, 2021), para. 9. Note that in the Alternative SDR Disciplines, the authorization fee obligation is different, and will be discussed further below.

3 SDR Disciplines (WTO, 2021), para. 13 (c).

4 TFA, Article 6.1.

5 TFA, Article 6.1.

6 WTO (2005), para. 7.385.

7 WTO (2005), paras. 7.378-388; WTO (2001), paras. 11.67-68.

8 SDR Disciplines (WTO, 2021), para. 9.

9 SDR Disciplines (WTO, 2021), para. 22(c).

10 Alternative SDR Disciplines (WTO, 2021), para. 8. Consistent with the horizontal SDR Disciplines, the footnote adds that “[a]uthorization fees do not include fees for the use of natural resources, payments for auction, tendering or other non-discriminatory means of awarding concessions, or mandated contributions to universal service provision.”

11 It should be noted that an equivalent provision has recently been added to the WTO Agreement on Investment Facilitation for Development (IFD) (Article 18.2), official document INF/IFD/W/55, for application on foreign direct investment in all economic sectors, including services sectors. However, discussions on the incorporation of the IFD Agreement in the WTO rulebook are still ongoing among WTO members and, therefore, the Agreement is not yet in force.

12 CPTPP (2018), Article 10.8.5; USMCA (2020), Article 15.8.4.

13 See, for example, RCEP (2022), Article 8.15; Pacific Alliance Additional Protocol (2016), Article 9.9(4); EU-Japan EPA (2019), Article 8.31.2; UK-Japan CEPA (2021), Article 8.31.2; Indonesia-Republic of Korea CEPA, Article 6.10.3(a).

14 See, for example, UK-Australia FTA (2023), fn 19 to Article 8.8.8; UK-New Zealand FTA (2023), fn 8 to Article 10.9; UK-Iceland, Liechtenstein and Norway FTA (2023), fn 38 to Article 3.36; EU-UK TCA (2021), Article 151.3; ATISA (2021), fn 9 to Article 16.10; RCEP (2022), Article 8.15.7(a); USMCA (2020), Article 15.8.4; and CPTPP (2018), fn 7 to Article 10.8.5.

15 EU-Canada CETA (2017), Article 12.3.8.

16 UK-Iceland, Liechtenstein and Norway FTA (2023), Art. 3.38: Publication and Information Available; EU-UK TCA (2021), Article 153: Publication and information available; PACER Plus (2020), Chapter 7, Art. 17.3.c; USMCA (2020), Article 15.8.6(a).

17 Government of New Zealand, *Financial Markets Conduct (Fees) Regulations 2014*, LI 2014/110 (version as at 1 January 2024), <https://www.legislation.govt.nz/regulation/public/2014/0110/latest/whole.html#DLM6001542>.

18 Government of New Zealand, Financial Markets Authority (FMA), “Financial Institution Licensing” (22 January 2024), <https://www.fma.govt.nz/business/services/financial-institutions/financial-institution-licensing/>.

19 Government of New Zealand, *Financial Markets Conduct (Fees) Regulations 2014*, LI 2014/110 (version as at 1 January 2024), Schedule 1, Part 1.1, <https://www.legislation.govt.nz/regulation/public/2014/0110/latest/whole.html#DLM6001542>.

20 Government of New Zealand, Financial Markets Authority (FMA), *Financial Institution Licence Guide*, Version 3 (2025), p. 6, <https://www.fma.govt.nz/assets/Licensing-guides/Financial-institution-licence-guide.pdf>.

21 Government of New Zealand, *Financial Markets Conduct (Fees) Regulations 2014*, LI 2014/110 (version as at 1 January 2024), Schedule 1, Part 1.1, <https://www.legislation.govt.nz/regulation/public/2014/0110/latest/whole.html#DLM6001542>.

22 Government of New Zealand, FMA, *Financial Institution Licence Guide*, p. 6, <https://www.fma.govt.nz/assets/Licensing-guides/Financial-institution-licence-guide.pdf>.

23 Government of New Zealand, *Financial Markets Conduct (Fees) Regulations 2014*, LI 2014/110 (version as at 1 January 2024), Schedule 1, Part 1.1, <https://www.legislation.govt.nz/regulation/public/2014/0110/latest/whole.html#DLM6001542>.

24 Government of New Zealand, *Financial Markets Conduct (Fees) Regulations 2014*, LI 2014/110 (version as at 1 January 2024), Schedule 1, Part 1.2, <https://www.legislation.govt.nz/regulation/public/2014/0110/latest/whole.html#DLM6001542>.

25 Government of New Zealand, Financial Markets Authority (FMA), “Financial Institution Licensing” (22 January 2024), <https://www.fma.govt.nz/business/services/financial-institutions/financial-institution-licensing/>.

26 Government of New Zealand, Financial Markets Authority (FMA), *Financial Institution Licence Guide*, Version 3 (2025), p. 6, <https://www.fma.govt.nz/assets/Licensing-guides/Financial-institution-licence-guide.pdf>.

27 This payment is to apply for a financial institution licence and does not include any annual levies or fees to register on the Financial Service Providers Register.

28 Government of New Zealand, Financial Markets Authority (FMA), *Financial Institution Licence Guide*, Version 3 (2025), p. 6, <https://www.fma.govt.nz/assets/Licensing-guides/Financial-institution-licence-guide.pdf>.

29 For England and Wales, see: Solicitors Regulation Authority, "How much does the SQE cost?", <https://sqa.sra.org.uk/about/cost>; "Fee policy 2025/26" (Updated 30 September 2025), <https://www.sra.org.uk/mysra/fees/current-fees/>. For Singapore, see: Singapore Institute of Legal Education, "Part A of The Singapore Bar Examination", <https://www.sile.edu.sg/the-singapore-bar-admission/part-a/>; The Law Society of Singapore, "PC Application", <https://www.lawsociety.org.sg/for-lawyers/pc-application/>.

30 In England and Wales, the practising-certificate fee is collected alongside earmarked levies (e.g. contributions to the oversight bodies and a separate Compensation Fund contribution), which are ring-fenced for regulatory/consumer-protection purposes.

31 Intven, Oliver and Sepulveda (2000), pp. 2-4; Blackman and Srivastava (2011), p. 65.

32 Intven, Oliver and Sepulveda (2000), pp. 17-18; ITU (2016), p. 10.

33 Intven, Oliver and Sepulveda (2000), p. 18.

34 ITU (2016), pp. 25-27.

35 Government of Singapore, Infocomm Media Development Authority (IMDA), *Guidelines for Submission of Application for Services-based Operations Licence*, Version 5b (2022), p. 6, <https://www.imda.gov.sg/-/media/imda/files/regulations-and-licensing/licensing/telecommunication/services-based-operations/sboguidelines.pdf>.

36 Government of Singapore, Infocomm Media Development Authority (IMDA), *Guidelines on Submission of Application for Facilities-based Operations Licence*, Version 7 (2025), pp. 6-7, <https://www.imda.gov.sg/-/media/imda/files/regulations-and-licensing/licensing/telecommunication/facilities-based-operations/fboguidelines.pdf>.

37 Government of Singapore, Infocomm Media Development Authority (IMDA), *Spectrum Management Handbook*, Issue 1 Rev 2.16 (2022), p. 35, <https://www.imda.gov.sg/-/media/imda/files/regulation-licensing-and-consultations/frameworks-and-policies/spectrum-management-and-coordination/spectrummgmthb.pdf>.

38 Government of Singapore, Infocomm Media Development Authority (IMDA), *Spectrum Management Handbook*, Issue 1 Rev 2.16 (2022), p. 35, <https://www.imda.gov.sg/-/media/imda/files/regulation-licensing-and-consultations/frameworks-and-policies/spectrum-management-and-coordination/spectrummgmthb.pdf>.

39 Government of Singapore, Infocomm Media Development Authority (IMDA), *Spectrum Management Handbook*, Issue 1 Rev 2.16 (2022), p. 36, <https://www.imda.gov.sg/-/media/imda/files/regulation-licensing-and-consultations/frameworks-and-policies/spectrum-management-and-coordination/spectrummgmthb.pdf>.

40 Government of Singapore, Infocomm Media Development Authority (IMDA), *Spectrum Management Handbook*, Issue 1 Rev 2.16 (2022), p. 36, <https://www.imda.gov.sg/-/media/imda/files/regulation-licensing-and-consultations/frameworks-and-policies/spectrum-management-and-coordination/spectrummgmthb.pdf>.

41 Government of Singapore, Infocomm Media Development Authority (IMDA), *Spectrum Management Handbook*, Issue 1 Rev 2.16 (2022), p. 9, <https://www.imda.gov.sg/-/media/imda/files/regulation-licensing-and-consultations/frameworks-and-policies/spectrum-management-and-coordination/spectrummgmthb.pdf>.

42 Government of Singapore, Infocomm Media Development Authority (IMDA), "Licences", <https://www.imda.gov.sg/regulations-and-licences/licensing>.



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