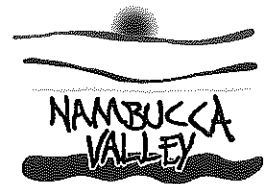


Nambucca Shire Council



Enquiries to: Richard Spain
Phone No: 02 65680234
Our Ref: SF194

20 July 2018

Communications Alliance
PO Box 444
MILSONS POINT NSW 1565

Dear Sir/Madam

SUBMISSION TO INDUSTRY CODE DR C564:2018 – MOBILE PHONE BASE STATION DEPLOYMENT

Council wishes to take the opportunity to comment on the draft Industry Code DR C564:2018, Mobile Phone Base Station Deployment and express some of the significant concerns it has with the proposed Code.

The installation of telecommunications equipment on Council reservoirs has posed and continues to pose a significant and unacceptable risk to the safe and secure provision of water through the Nambucca Shire. These risks are due to:

- these installations having the potential to compromising the integrity of the water supply structures allowing the possible ingress of contaminants that may pose a significant health risk to water consumers.
- the location of telecommunications equipment on reservoir roofs can hinder the ability of Council staff from accessing the roof to undertake routine operation and maintenance activities
- Council staff that access reservoirs are required to undertake specialised training in dealing with radio frequency hazards when it is not their core business.
- telecommunications carriers fail to maintain the roofs or make good any damage despite a requirement stipulated in the respective leases.
- many of the installations having been installed in such a way as to compromise Council's ability to properly maintain the structure

It is considered the Draft Industry Code does not fully address all the issues associated with installing telecommunications equipment on Council infrastructure address and may not assist Council's ability to safely operate and maintain its water supply infrastructure.

Specific points of concern are:

Section 4.3 Site Operation

Needs to include specific requirements for the Carrier to operate in such a way that the Council can maintain its operations without any additional impediments or increased risks.

Section 5 Small Scale Infrastructure

There needs to be a mechanism in place to resolve issues where Council considers that these installations are not appropriate.

Section 6.1 Development and Evolution of Consultation Plan

The onus should be placed on the Carrier to complete a risk assessment of the proposed installation in regards to how it may impact on Council's operations. Where an unacceptable risk is identified the installation should not proceed or some form of transfer of liability should come into play.

Section 6.4 Assessing and Reporting on Outcomes

There appears to be no process in place for dealing with objections where the installation of the asset is considered to be inappropriate due to unacceptable risk. Does Council have the right to refuse the installation of the communications equipment on its asset if it feels that the risks are unacceptable.

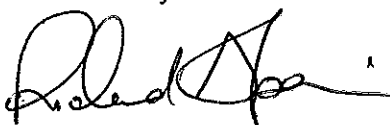
Section 7 Notification to Councils and the Public

The onus should be placed on the Carrier to arrange for independent auditing of EME of all installations and additions to existing installations following completion of the work. This information should be made available to Council and the public.

As stated above Council considers the installation of telecommunications equipment on its reservoirs can pose an unacceptable risk to its operations and the safe and secure provision of water to consumers. Council believes that this should be appropriately addressed through the proposed Industry Code.

Should you have any queries regarding these matters please contact the undersigned on (02) 6568 0234.

Yours faithfully



Richard Spain
MANAGER WATER AND SEWERAGE

RS:hl