



18 July 2018

Communications Alliance Ltd
Via Online Submission

Dear Sir / Madam,

Re: Comments Sought on Draft Industry Code: Mobile Phone Base Station Deployment

I write on behalf of Huawei Technologies (Australia) Pty Ltd with regards to the proposed changes to the Deployment Code. Please refer to the comments below:

SECTION 4 – MOBILE PHONE RADIOCOMMUNICATIONS SITE SELECTION, DESIGN AND OPERATION

Section 4.3 – Moving the ‘Section 8.0 Precautionary Checklist to Site Operation’ to Section 4 is supported as the all the precautionary approach checklists will now be more clearly defined under one section. The RFNSA Deployment Code Checklist will need to be updated to reflect this.

SECTION 5 – SMALL SCALE INFRASTRUCTURE

Section 5.1.3 – The Deployment Code 2011 currently provides a definition in Section 5.1.2 for the reference to ‘close proximity’ in relation to notification to occupiers of a residents. Can a definition for ‘immediate vicinity’ be provided in the revised Code to minimise any inconsistencies that may arise?

Section 5.2 - The introduction of Section 5.2 Notification for Small Radiocommunications Facilities will have positive implications for the deployment of small cell infrastructure. The requirements of Section 5.2 are suitable given the scale, context and minimal visual impact of small cell infrastructure.

Consultation Timeframes – There are no timeframes provided for activities undertaken in accordance with Section 5 of the new Code. To ensure that consultation is not an open ended process, is it worth providing a consultation timeframe and due date for comment from interested and affected parties notified under this Section? 10 business days is a suitable timeframe for comment and this is in line with Section 7 notification.

SECTION 6 – CONSULTATION REQUIREMENTS FOR INSTALLATION AT A NEW SITE WITHOUT DEVELOPMENT APPLICATION

Section 6.2.4 – 10 business days is a sufficient timeframe for Council to provide comment on the Consultation Plan. Council will be provided with the opportunity to comment on the proposal during Section 3 activities. 10 business days is therefore suitable.

Section 6.3.12(c) – From experience it is impractical to ensure that site signage is maintained until site construction is complete. Council and community members in the past have removed site signage during the consultation period. When brought to our attention and where practical we have put a replacement sign on site. There can also be a delay between end of consultation and construction commencement. It is impractical to ensure that a sign is maintained during this period. A solution would be to ensure that a sign is placed on site during the consultation period, and removed at either closure of Section 6 activities or at construction commencement.

Section 6.3.15 – As per the Code, 20 business days is a suitable timeframe for Council to comment on the proposal.

Section 6.3.16 – As per the Code, 15 business days is a suitable timeframe for Interested and Affected Parties to comment on the proposal. The additional 5 days provided to Council allows them to consider any separate submissions made direct from community so that Council can provide a response to the Carrier or representative.

SECTION 7 - NOTIFICATION TO COUNCILS AND THE PUBLIC – INSTALLATION AT AN EXISTING SITE WITHOUT DEVELOPMENT APPLICATION

Section 7.2 – The public notification requirements are less clearly defined in the Code amendment. Can ‘area surrounding’ the location of the proposed works be defined in the Code? This will assist in minimising inconsistencies and scrutiny from third parties in relation to the extent of consultation undertaken under this Section.

A methodology behind why a particular notification method was chosen will assist Carriers in ensuring that an appropriate medium has been selected and that best practice has been employed. Can this be provided in the amended Code?

Section 7.2(g) – Amending Section 7 consultation timeframes from calendar days in the current Code to business days is supported as it ensures consistency with Section 6 activities.

Thank you for providing us with the opportunity to make a submission on the proposed amendments. If you require any clarification on the above, please contact the undersigned.

Regards,



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