

12 May 2017

Craig Purdon, Project Manager
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By email: c.purdon@commsalliance.com.au

Dear Craig,



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Re: MCF response to Communications Alliance request for comment on scheduled review of C564:2011 Mobile Phone Base Station Deployment Industry Code

The Mobile Carriers Forum (MCF) is grateful for the opportunity to comment on the Communications Alliance's proposed scheduled review of the above industry code (the Code).

As you would appreciate, the MCF has a major interest in the operation of the Code, and has invested considerable resources into the implementation, support and continued compliance with the Code when deploying its mobile network infrastructure.

Moreover, the industry has found the Code a valuable tool for guiding industry's consultation practices when deploying network infrastructure of all kinds. We believe the Code has positively contributed to achieve benefits of transparency of deployment activities and increased engagement with the communities where network infrastructure is deployed. The implementation of the Code has also seen a significant decrease in complaints to our regulators regarding deployment processes.

We are therefore keen to see the continuance of the Code and to ensure it remains relevant and fit for purpose as technology and deployment practices evolve over time. The scheduled review therefore seems timely, especially given the dynamic nature of the mobile telecommunications industry, and in particular being on the cusp of the introduction of a significant new generation of technology in 5G.

The Communications Alliance request for comment lists a number of areas which may be considered in the scheduled review. In particular, the MCF considers there is always opportunity for clarifications that improve the interpretation or certainty of requirements in the Code, and given the evolution of technology described above, that there will be particular value in considering the impact of technology changes on certain sections of the code. We particularly note Sections 5, 6 and 7, regarding notification and consultation requirements for different kinds of deployment processes where development application or planning approval is not required, would likely be impacted by the deployment of new technologies.

The MCF also would look forward to participating in any Code review and requests for it and its member representatives to be included on any committee or panel formed to undertake a review of the Code subsequent to Communications Alliance's conclusion of the current comment phase. The MCF would present its proposals for any required amendments in more detail at that time.

Overarchingly however, it is the MCF's members' view that the Code continues to serve both the industry and communities well. For this reason, the MCF would like to see a concise and speedy review, with minimal disruption in operations for the industry, and minimal uncertainty for communities where deployments may be occurring during the transition period of reviewing the Code.