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16 July 2018

Communications Alliance LTD

To whom it may concern

RE: Submission for Public Comment - DR C564:2018 - Mobile Phone Base Station Deployment

Whitsunday Regional Council has some concerns in regard to the proposed ACMA amendments to the Industry Code - Mobile Phone Base Station Deployment, which will affect installations on our infrastructure.

The key aspects of the submission that will concern Council are:

- In general, it is unclear how the contents of this document relate to the LAAN process, and which process is the superior process.
- Section 6.1.2, this should include how the installation will or won't affect the facility's primary purpose and owner's operations, asset management, WHS of their staff and water quality. The onus should be placed on the Carrier to assess impacts of any installation. Where the installation is considered by the asset owner to pose an unacceptable risk to either the asset or the general public served by the owner's asset, the proposal should not proceed without a transfer of liability from the asset owner/operator to the Carrier.
- Section 6.2, this needs to include realistic timeframes to assess information and object if possible. Also, the onus should be on the Carrier to provide adequate information and prove that the installation won't affect and poses no risk the facility's primary purpose, operations, maintenance, integrity etc.
- Section 6.4.3, what about the process dealing with objections, complaints, issues raised by affected parties if not satisfied by the Carrier's response? Timeframes? What is the process if the asset owner considers the installation poses an unacceptable risk to either the asset or the general public served by the owner's asset.
- Section 7, Notes; how is the combined impacts of individual Carrier installations assessed with respect to the facility's structural integrity, operation, maintenance, modifications or replacement by the facility owner? Further, how is the impact of the installations on the primary purpose of the facility (e.g. provision of safe and secure water supply) assessed? The onus should be placed on the Carrier installing a new installation to an existing site or modifying existing installations to address these issues. Independent auditing of EME is required to provide combined EME impacts of collective installations. Where a site shut-down is required to affect any site inspection, exposure to RF/EME radiation, that there is a common number to ring to negotiate this shut-down. Contacting individual service providers to negotiate a site shut-down is a frustrating, time consuming process.

Yours faithfully



Peter Stapleton
Treatment Operations Manager

