

**Vodafone Hutchison Australia Submission to Senate
Environment and Communications Legislation Committee**

**Inquiry into the Telecommunications Amendment
(Mobile Phone Towers) Bill 2011**

Vodafone Hutchison Australia Pty Limited (VHA) welcomes the opportunity to make a submission in regard to the Telecommunications Amendment (Mobile Towers Bill) 2011 (the Bill).

As part of our commitment to responsible deployment, VHA applies the principles of safe systems, consultation and sensitive environmental planning, good design and environmental protection to all its base station network development and operations. Community health and safety is paramount to us. VHA strictly adheres to all the national guidelines and standards relating to mobile phones and mobile infrastructure, including base stations. VHA applies a strict policy of building and operating its base stations well within the limits of national health and safety standards, applying the objective of minimising electromagnetic energy (EME) whilst meeting service requirements.

VHA is a member of the Australian Mobile Telecommunications Association (AMTA) and its forum, the Mobile Carriers Forum (MCF), and we fully support the arguments raised in the AMTA submission to this Inquiry.

VHA believes that the impact of the proposed Mobile Phone Towers Bill will be to:

- diminish consumer benefits provided through mobile telecommunications;
- reduce the contribution of mobile telecommunications to Australia's economic productivity and social connectivity;
- inhibit investment and/or causing under-investment in latest generation mobile telecommunications infrastructure and technologies;
- reduce government spectrum revenues from the mobile industry and;
- significantly increase the cost burden on local councils.

The operational impacts of the proposed Mobile Phone Towers Bill 2011 will likely result in:

- confusion in the community by concurrently running parallel notification/consultation obligations – the local council DA process; the new stakeholder consultation requirement to notify all owners/occupiers within 500 meters; the extension of the landlord notification to include adjacent occupiers to 500m with a 30 business days notice for activity; and the existing Deployment Code C564 requirements.
- delays in all low impact facility installation activities and maintenance activities including rectification of service faults or simply replacing an antenna - as a result of removing the low impact class of infrastructure and restricting the definition of *maintenance*
- increased cost and resource burden on local government which would reduce council's ability to meet its broad community obligations and also increase delays in decisions regarding Development Applications.
- excessive public notification on telecommunications activity which is not commensurate with notification for any other type of service or development activity.

We submit that:

- The existing network deployment regulation is working effectively in striking a balance between consultation expectations of communities across Australia and the delivery of an efficient and effective network that meets customer expectations and service demands.
- The revised industry Deployment Code C564 scheduled to be implemented from 1 July, developed with strong community representation will deliver enhanced consultation and easy access to information about exposure levels around individual sites; how sites have been selected; and keep communities up to date key milestones and developments about a proposal
- The radiofrequency exposure standards have been stable for many years supported by regular national and international expert scientific review. Separate to any legislative amendment, VHA would support ARPANSA, periodically publishing formal update statement statements on the adequacy of the ARPANSA standard supported by relevant expert review conclusions on any new science.

As such, VHA puts the case that there is little or no need to change the existing Telecommunications legislation by introducing the Telecommunications Amendment (Mobile Phone Towers) Bill 2011.