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19 August 2009

Alison Kelly (SEN), Secretary
Department of the Senate
Select Committee in the National Broadband Network
SF61.1 Parliament House
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Re SUBMISSION RE NATIONAL BROADBAND NETWORK

Dear Alison,

At our Committee Meeting on Monday night, approval was formally given to lodge a Late Submission in regard to the proposed National Broadband Network, with thanks for your assistance in securing agreement that it would be accepted by the Select Committee.

Although the Haberfield Association is neither corporate giant nor high-power technology group, we trust our comments will be useful to the Select Committee in their considerations.

Indeed, after reviewing the list of mostly big-name submissions to date, we believe HABAS offers a much-needed alternative approach, and one that gains in significance by being presented from a grass-roots community viewpoint.

We have kept this Submission brief, and deliberately focused on key issues of concern, namely the long-term need for 21st century Broadband to be delivered in a 21st century way. We would however be delighted to add any further information and/or comment as required.

Trusting this assists the Select Committee,

Yours sincerely

A handwritten signature in black ink that reads 'Emma Brooks Maher'.

Emma Brooks Maher
President

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Submission
to
Senate Select Committee
on the
NATIONAL
BROADBAND
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**Department of the Senate
Select Committee in the National Broadband Network**

**Submission by The Haberfield Association Inc on the proposed
National Broadband Network Roll-out and the
COUNTER-PRODUCTIVITY
inherent with aerial cabling via power poles.**

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INTRODUCTION & THEME

The Haberfield Association thanks the Select Committee for accepting this late submission. Indeed, it is only a week ago that we became aware of that, as the Tasmania Pilot Program is about to begin, this roll-out may involve the use of existing power poles – raising issues that have been of critical concern to this community since at least 1995. It is thus timely, and appropriate to present these matters for consideration of the Committee.

Our one aim is long-term - to ensure that, after the many promises made and the massive investment required, that Australia gains a broadband network that takes this country well into the future. No matter how fast or how good the broadband technology is – if the delivery system used is climate-vulnerable and inherently obsolete, namely aerial cabling, then the whole exercise already hitched back by history. In such circumstances, to claim an aim is international competitiveness is a delusion. Especially where world's best practice is already underground, or going there – fast. In short, we submit:

**21st Century Broadband
needs a
21st Century Network**

The secret is a long-term strategy that delivers NBN now – but in such a way that it works for the future. There are complex issues involved, but nothing that commonsense and indeed, ultimate NECESSITY cannot resolve. This include costing, taken on a NATIONAL scale.



BACKGROUND – HABAS

Today HABAS is widely known as a leader in raising awareness of the heritage values of Haberfield as a Garden Suburb with great significance at State, national and international levels.

However, the first item in our Constitution is to encourage community values, and this has long been interpreted as speaking out on matters of major social concern, including Telecommunications as a local, State and national level.

In fact, HABAS has been consistently active in comments and submissions and the following are some of our major inputs in this area:

- 1995 **AUSTEL INQUIRY**
Written submissions re National Telecommunications Code Review, participation in Public Hearings, then by invitation as witness/presentation at formal Meeting of Panel in NSW Parliament House.
- 1994-95 **HABERFIELD DCP**
Thanks to initiatives and input by The Haberfield Association, this is the first town planning instrument in NSW (and to the best of our enquiries, in all Australia) which contains a Section 4 specifically addressing – “Modern Technological Developments...and Telecommunications Structures”
- 1995-97 **OPTUS ROLL-OUT**
During this period we made concerted submissions and protests regarding the Optus roll-out of overhead cables. A main rationale involved parallel submissions re the heritage impacts of the then-new Environment Protection & Bio-diversity Act.
As a result, Optus was required to abort its planned roll-out in Haberfield, and there are no Optus cables in this suburb. Work also ceased regarding a proposed telecommunications tower on this side of Parramatta Rd. Moreover, using Haberfield as precedent, other areas on the Register of the National Estate were able to claim similar exemption.
- c.1995 **HABERFIELD SHOPPING CENTRE**
Haberfield is so conscious of aerial cabling, and its adverse impact that about 15 years ago, when a \$40,000 Heritage Grant was made available. the Main Street Committee unanimously agreed to use it all for removal of power poles along the shopping centre. Installing bundled cabling along the back of shop awnings has made a huge difference. The contrast has left our community with an active, ongoing interest in promoting alternatives to the visual intrusion and other negatives inherent in overhead cables. Hence this submission.

Above all, we say that today we don't want another OPTUS. The community dislocation and dismay was bad enough in 1995. To do it again in 2010 would be a disaster.



BACKGROUND – HABERFIELD

Haberfield was started in 1901 by Richard Stanton a real-estate entrepreneur with a specific vision of establishing a “Model Suburb” based on garden city principles. Thanks to his vision, this suburb was a pioneer in such developments as mandatory sewer access, double-brick cavity construction, enviro-friendly eaves and verandahs, wide tree-lined streets and healthy backyards. The Federation houses are attractive – but even more remarkable for the social engineering that transformed paddock, swamp and bushland to coveted commuter suburb in little more than a decade. The pre-powertool logistics involved are amazing – and a lesson that remains relevant on how integrated planning simplifies steady roll-out within tight time frames.

But of even more interest for the NBN is how Stanton discovered a new technology and used it to the max. In 1904 his shift to include driveways for cars marked an all-new concept in residential planning – years ahead of anywhere else. No more old ideas based on an era of horse-and-cart. This typically bold response to the emerging “new” is a major reason why Haberfield’s heritage is of international significance. There are lessons here for all planners – including for the NBN roll-out.

With true Stanton spirit, Haberfield would welcome the chance to be selected as location for a NBN pilot project for the transition to underground in pre-existing urban areas.

AIM OF THIS SUBMISSION

As an active community group, HABAS is keenly interested in the National Broadband Network, and has been watching developments since the previous announcements and process as started in 2008. When the decision was made in April 2009 to focus on a wholesale FTTP format, and with a proposed pilot program in Tasmania we did not realize that there was any input required from a heritage suburb like Haberfield.

However it has now come to our attention that the chosen contractor for the Tasmania pilot is Aurora, a Victorian POWER SUPPLIER, and that there is every likelihood that the preferred method of delivery will be on power poles – suddenly we realize that such proposal cannot be allowed to pass without pointing out the dangers.

The aim then is to give the Select Committee a point of view very different from anything that shows on the website list of submissions as at mid-May 2009 – and one that takes account of a bigger picture than just technologies options or telecommunications. Because, at the end of the day any National Broadband Network must work within a wider infrastructure, and towards long term expectations.

Our point of view is that of a concerned community that sees pitfalls in the short-termism of tacking a new network onto old infrastructure that should have been phased out decades ago. Power pole methodology gained an artificial “lease of life” thanks to the Optus roll-out, and we are deeply suspicious of any attempt to do the same yet again for NBN. Huge dollars \were invested in upgrades and replacements of delivery mode, to the ongoing detriment of delivery result – and the community is still paying the cost in tree vandalism and road deaths.

Not only do se say NEVER AGAIN, we add –
see it as a 2-IN-1 NATIONAL OPPORTUNITY



POLES OF CONTENTION

As explained earlier, The Haberfield Association has strong community reasons to be aware of issues regarding power poles. Apart from our own local experience, many HABAS members have traveled extensively. Indeed, a past-President is involved with the ICOMOS Committee and participates in international conferences where urban environments are a key study.

So we have been to many countries and seen that power poles are non-existent in most European cities, and seldom occur even in villages. We are aware that both UK and France consider this method of cable-delivery as obsolete and have an active policy of removal, and that this work is proceeding as a priority for reasons of (1) cable efficiency, and (2) road safety.

Here in Australia, HABAS members, and indeed anyone with eyes, can see how old many existing poles are – how decrepit and unfit for service now, much less for extra loading.

For instance: in the Haberfield street where this submission is being written, there are 17 homes and 8 poles – 5 for power/wires and 3 for lights. As of today, 2 are in such poor condition they have long metal bracing as supports and 2 have had to be totally replaced in the last six months. In short, 50% seriously compromised in one small, quiet street. It's a poor ratio. And these poles are very low-use: they suffer no damage from main road traffic, and carry a minimum of cabling – Telstra is underground and there's no Optus.

Now translate this scenario to real-life on a wider scale – poles leaning, poles with add-ons already, poles 10cms from B-double trucks hurtling along arterial roads, poles at intersections with a mélange of cabling on all directions and then expected to take extra wires – all positioned as set distances apart. It's a nightmare out of the dark ages, and bears no relation to a smooth operation for today's needs – much less for long-term into the 21st century.

POLES OF INCONSISTENCY

Haberfield Association does not claim to be experts in technology. However, this is a new era in technological development –and the NBN roll-out is part of this. The hardware of HOW it's delivered should be considered an integral part of the master plan. This means consideration of putting cables underground as a matter of POLICY. Not just “encouraging” greenfield installations “where possible” – but of mandating undergrounding in the interests of consistent service delivery. There is overwhelming practical evidence of why this is essential.

Consider the constant news about power outages caused by freak winds, tempests, cyclones etc.. How often do we read of car accidents, high trucks clipping a low-slung wire - poles down, and thousands of homes cut off for hours. This is not just inconvenience for electric kettles. It affects every aspect of modern life: no-go cash registers, lifts, security gates, traffic lights, electronic doors, ATMs, computers. Suddenly there's no broadband, fast or slow.

Fast-speed Broadband depends on being seen at the other end – and whether it's home, business, bank, hospital or school – the computer, screen or monitor depends on power to work. In this context, to rely on old-style power poles is so retrograde as to be self-defeating. Yet, other than the recent Kelso-Downey submission, no-one has raised this a point of VITAL concern re practical delivery - ie NBN outcomes in real-life.



OTHER CONSIDERATIONS

Habas is aware of other aspects of NBN cabling that the Kelso-Downey submission highlights vis-à-vis power-poles Vs undergrounding – namely the inherent unreliability of wires left swinging in the wind. The fact that this writer hears daily beeps from a UPS is audible proof that power surges and inconsistencies are a constant threat to computer viewing/services. Allowing NBN cables to also hang in the open would multiply the problem, no matter how heavy the insulation cover. Going underground would be a significant safeguard.

The topic of weather extremes cannot be ignored, or consigned to footnotes as the old 1-in-100 yr event. Climate change is happening, and it will have an increasing affect on infrastructure left in the open air. It is a real issue that the NBN must take into account.

We urge the Committee to also take note of the Kelso-Downey comments re maintenance – that fibre-optic cables are not easily repaired when located high-up in open air, and that in crisis situations (lines down) there would be live power to contend with – requiring specialized staffing and OH&S procedures, far beyond normal fibre-optic expertise.

Reading some of the earlier submissions, we believe that it has been a fundamental flaw that most have been too concerned with Telecommunications, and not enough with the big picture – what it really means at a community level, and when things go wrong.

For instance - we are very mindful of the recent Black Saturday bushfires in Victoria. Above-ground power was among the first to go - leaving whole communities with no communications and thus totally at risk. If nothing else, this example argues a strong SAFETY case for undergrounding all cables, starting with NBN, in bushfire-prone areas.

CONSIDER THE COST FACTORS

The Haberfield Association does not have the resources to do detail cost comparisons on cable networks. But we do know certain facts re power pole costings that should be taken into account in terms of NATIONAL COST/BENEFIT ANALYSIS. Yet they seldom are – like the value of gaining 4 times greater reliability, and lower maintenance costs. There are other aspects too:

First - road safety. It's a simple fact that 10% of all road deaths involve a roadside power pole. The ratio of injury, especially brain-impact trauma is far higher. Every road death costs this country millions in lost productivity etc. To extend pole usage under guise of NBN would perpetuate this huge cost in \$\$ and human suffering.

Next - every year street trees are butchered by chain-saw to create cable clearances. The damage is not just visual – there is a huge \$ cost involved – and it recurs year after year after year. In Haberfield “The Garden Suburb” we are critically aware of this, not only with increased Council rates subsidising the power retailers, but also at the major massacre in our green streets. These trees are deserve better -many were planted by Stanton himself.

The cost isn't just an ongoing financial waste – there's the loss of canopy itself . How perverse to destroy a huge swathe of carbon sink that should be helping absorb all the nasties in a car-congested inner urban environment. On these grounds alone, the Committee should consider non-pole alternatives if the NBN is to deliver a 21st century service for a 21st century world.



GREENFIELD STRATEGY

We note that the intention of the NBN roll-out is to encourage undergrounding in Greenfield developments. We believe that the wider cost factors mentioned above indicate that this should be upgraded to “mandated”. Service-delivery and reliability are too important to leave to chance.

It makes sense that all new development should be required to eschew 19th century techniques (which power poles indisputably are) and use best-practice cable techniques – ie to go underground. The speed and simplicity of trenching today makes this a logical choice, as well as the right way to go for all the above reasons.

But the NBN must also be delivered within a time frame, so time is a key factor in the rollout. This means that a strategy will need to be developed that uses existing power poles ONLY where this is an immediate necessity, probably in designated and/or dense inner urban areas, and always with a SPECIFIED SUNSET CLAUSE requiring changeover to underground no later than (say) 2015.

Use of poles should be a temporary expedience, not an approved mode. It should be condoned only in strict circumstance, gained after application and only for time-limited exemption.

At HABAS we are aware of the various excuses used by power suppliers and are not convinced. Our experience during the time of Optus roll-out in 1995-97 suggests that “methinks they doth protest too much”. In fact, we were witnesses on the street to how quickly and smoothly the Telstra underground cables were installed. We see no reason why this success should not be replicated for the NBN roll-out. Especially when measured HOLISTICALLY against the rationale for having an NBN in the first place – equity, productivity and international competitiveness,

BIG PICTURE - INVESTMENT POTENTIAL

We understand that cost is a key consideration – but we believe that when all the REAL COSTS are factored in, this bogey is not nearly as big as it’s claimed to be. In NSW we have been disillusioned at the way IPART consistently omit major factors, fatally skewing any real comparisons. We urge the Select Committee to look behind the superficial figures.

We also urge the Committee think of it this way – as a 2-in-1 NATIONAL INVESTMENT - a real opportunity to do something bigger than needed, as a national great leap forward into the real 21st Century. Imagine it – an Australia with all power underground.

By ensuring that the network for NBN uses underground ducts suitable for multi-use, it changes the ballgame. It simplifies the decision for power companies to also go underground, to piggy-back in on the NBN system. It also provides for leasing and licensing opportunities – ie INCOME STREAMS TO OFFSET AGAINST THE INITIAL OUTLAYS.

We have not gone into details re benefits that would come for the future management and maintenance of an INTEGRATED underground NBN, but these would be considerable.



Although assisting power suppliers is not in the NBN brief, anything which ensures a better, more reliable NBN service IS – and going underground for the broadband cables, thereby incentivising power suppliers to do likewise will definitely assist NBN users long term.

Already the Government has proven it has the courage to step boldly beyond the expected, to reject the immediate and shift into an al-new right path when it became obvious that the predictable options weren't good enough.

And the result -the NBN itself.

A similar situation now applies. Selecting the delivery mode for NBN is an equivalent fork-in-the-road. Opt for short term or easy availabilities will be a dead weight holding back the NBN doe decades to come. Take a truly NATIONAL big-picture approach means the NBN can become the catalyst for something that helps Australia catch-up with the undergrounding now being completed by equivalent countries overseas.

Finally – although HABAS is just a local community group., we hope that this glimpse into the hidden factors involved with (and lurking behind) behind cable-carrying power poles will be of use to the Senate Select Committee, and that you will now be alert to the huge hidden costs – in lives lost, families shattered, trees decimated, obsolescence extended, dire dollars wasted. We urge the NBN to, factor this into its considerations.

In short, we trust this Submission assists both the Senate Select Committee and the Panel of Experts in considerations regarding the National Broadband Network,

Yours sincerely

A handwritten signature in black ink, reading 'Emma Brooks Maher.' The signature is written in a cursive, flowing style.

Emma Brooks Maher
President

Attachments

- Haberfield Association submissions on Telecommunication matters (highlighted in general List)
- Basic Information re The Haberfield Association