

A submission by AMTA on behalf of the Mobile Carriers Forum  
(Optus, Telstra and TPG Telecom):

INDUSTRY CODE – DRAFT FOR PUBLIC COMMENT

C564:2024 MOBILE PHONE BASE STATION DEPLOYMENT

5 July 2024



## About AMTA

The Australian Mobile Telecommunications Association (AMTA) is the peak national body representing Australia's mobile telecommunications industry. It aims to promote an environmentally, socially and economically responsible, successful and sustainable mobile telecommunications industry in Australia. Please see [www.amta.org.au](http://www.amta.org.au)



## Introduction

AMTA welcomes the opportunity to provide this submission to Communications Alliance (CA) on behalf of the Mobile Carriers Forum (MCF) in response to CA's call for submissions in relation to the Draft of **C564:2024 Mobile Phone Base Station Deployment Industry Code** (the Code). Once registered, this will replace C564:2020 Mobile Phone Base Station Deployment Industry Code.

## Aim of the review

On behalf of the MCF, AMTA has been an active member of the CA Working Committee tasked with reviewing C564:2020 since its formation in September 2023.

The aim of the review was to identify:

- Any existing issues with the Code;
- Whether any process improvement is required, from operational experience in dealing with the Code;
- Any gaps in the Code;
- Clarifications that improve requirements;
- Whether the document is meeting the needs of industry and the community satisfactorily;
- Acknowledgement of any existing service specific barring requirements; and
- Expected impact of technology changes.

AMTA notes that over the past nine months the Working Committee has methodically reviewed each of these matters, together with submissions from various stakeholders.

## Working Committee process, participation and consensus

Since its inception in September 2023, the Working Committee has worked constructively to review the Code provisions in accordance with the aims of the review.

The Committee has comprised 'voting' and 'non-voting' members of the Working Committee including the Australian Communications Consumer Action Network (ACCAN), Australian Local Government Association (ALGA), MCF, Carriers, ACMA and the Department of Infrastructure, Transport, Regional Development, Communications and the Arts.

This Committee has endeavoured to work through the review of the Code on the basis of consensus, and without exception, the draft Code C564:2024 has been drafted with agreement from all Working Committee members on substantive points.

## Comments on the draft Code C564:2024

The MCF supports the draft Code C564:2024 but remains open to suggestions to improve Code provisions that may arise from the public comment process.

Matters that have been included in the review process to-date include:

- Updates to how personal information is collected and used by Carriers to ensure alignment with the Privacy Act and the Australian Privacy Principles. We note that further improvements will be made to Industry processes to implement Code provisions relating to privacy.
- Consolidated timeframes for consultation with Councils and Interested and Affected Parties (e.g. the total time for section 6 reduces from 30 business days to 20 business days). This process was welcomed by the Working Committee as the data compiled by the MCF found a very low rate of council responses to the consultation plan. The revised section 6 will enable councils to concurrently consult and provide comments to the consultation plan on the proposal. This was welcomed by ALGA as it will minimise the number of notifications (from 2 to 1) that council receives.
- Refreshed the consultation notification templates along with amendments to how stakeholders are notified.
- The Code will reduce the notification material required to be sent to Councils and Interested and Affected Parties, who will have the option to obtain more detailed information from the RFNSA via a QR code or link. This was widely welcomed by members of the Working Committee and endeavours to make use of online information thereby reducing the large volume of printed material.
- Removal of Appendix A and references to the Precautionary Approach under section 4 of the Code. This change was welcomed by all Working Committee members and aligns with the recently updated Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) Standard for Limiting Exposure to Radiofrequency Fields – 100 kHz to 300 GHz and the principles recommended by the International Commission on Non-Ionizing Radiation Protection (ICNIRP).
- There were many relatively minor drafting changes to ensure clarity, and the MCF welcomes these and notes that there will need to be a period of transition following registration of the Code to allow for implementation.

### Additional matter for Working Committee consideration

In addition to the changes developed by the Working Committee outlined above, MCF members have identified the following matter for further Working Committee consideration:

- One additional suggested amendment to the draft relates to the proposed change to S4.1.1(d) regarding carriers' considerations when selecting new sites. The intent of this section is to ensure that the carriers consider proximity to other mobile carrier's facilities, and this requires clarification due to public confusion in relation to this provision.

## Conclusion

AMTA supports the draft C564:2024 as it will provide improved clarity for industry and other stakeholders and will ensure that notification and consultation remain fit-for-purpose for the next five years following registration.