



1st April 2021

powersandimmunities@communications.gov.au

Department of Infrastructure, Transport, Regional Development and Communications

Dear sir/madam,

Response to draft amendment to *Telecommunications Code of Practice* and *Telecommunications (Low-impact Facilities) Determination*

Onewifi welcomes the opportunity to provide comment in relation to

- Telecommunications Code of Practice 2021, DRAFT v002 Exposure Draft 1 March 2021
and
- Telecommunications (Low-impact Facilities) Amendment Determination 2021, DRAFT v001 Exposure Draft 1 March 2021

About Onewifi

OneWiFi is Australia's leading end-to-end Smart City solutions provider and also an active advocate and supplier of Neutral Host Radio Network Solutions.

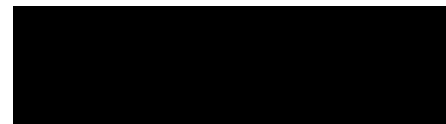
We are already providing WiFi neutral host services to over 1,200 locations, including Retail Precincts, Shopping Centres, Hospitality Venues, and Commercial Buildings. OneWiFi is also a licensed telecommunications carrier offering a range of high speed fixed and wireless internet options.

OneWiFi continues to invest in strategic relationships with Cities, Municipal and Regional Councils across Australia via a comprehensive suite of Smart City services to deliver the desired economic, community, sustainability, and technological outcomes. Over the years, we have been working with Local Government on 'Digital Enablement' and have contributed to a number of precinct revitalisation initiatives through Public Wi-Fi, local business engagement platforms, data analytics, and high-speed internet connectivity.



As a Licensed Telecommunications Carrier we would like to provide the following comments to the selected sections of the proposed drafts.

Amendment	OneWifi Comment
Schedule 1 3.2 Certifiable Facilities	Onewifi supports the proposed changes
3 Schedule, Part 1 – Radio facilities (table item 4, column 2, paragraph (b))	No Comment
4 Schedule, Part 1 – Radio facilities (table item 7, column 2, paragraph (a))	No Comment
5 Schedule, Part 1 – Radio facilities (table item 12)	Increasing tower heights <ul style="list-style-type: none"> • Will increase visual impact of the facility and visual clutter on a site that may be considered sensitive or contentious to a community and provide unintended outcomes • Will increase equipment size and perhaps may also lead to increased EME levels. • May not encourage collocation or cooperation of carriers at that facility and it may only provide more flexibility for expansion for the residing carrier(s) • Does not encourage carriers to adopt or apply technology sharing applications
6 Schedule, Part 8 – Co-located facilities (table item 2, column 3)	No Comment
7 Schedule, Part 8 – Co-located facilities (after table item 2)	<ul style="list-style-type: none"> • Increases to volumetric allowance will not correlate to increased infrastructure sharing on the same facility by Carriers, but rather more of the same legacy infrastructure. • It may only facilitate the existing carrier(s), by allowing an increase of their footprint, reducing the available volumetric and further reducing other Carrier collocation opportunities.



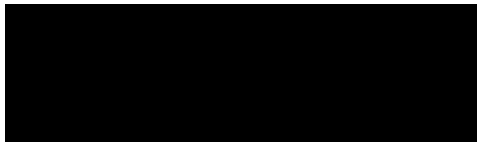
Telecommunications (Low-impact Facilities) Amendment Determination 2021
Draft v 001 1 March 2021

Exposure Draft of the Telecommunications Code of Practice 2021

Amendments	OneWifi Comment
Part 2 Primary Carrier Safety Conditions 1A.7 Engineering Certificate—Installations	We generally support these proposed changes. <ul style="list-style-type: none"> • Whilst the industry adheres to relevant Certifications and to Australian Standards these certifications are made available to Owners by request. • This proposed change will help address formal project completion, compliance to agreed designs within a timeframe. In effect this will provide the Owner certainty that the facility is fit for purpose and remove speculation as to build status which to date is not well managed consistently by the industry.
Part 5 General notification arrangements and objections to land entry activities	We generally support these proposed changes. <ul style="list-style-type: none"> • The proposed changes provide new rulings around objection and referral rules to the TIO. • Concerns still exist with handling expected increases with site volumes expected for both 5G and mmwave. Current legislation address's objections on a single facility basis but provides no consultation or process for large scale or precinct level activities, which would be of significance to councils, communities and the like

As a private Australian company delivering harmonised Digital Enablement on an equitable basis for the benefit of all stakeholders. As such we value this opportunity to help shape the Telecommunications industry and to provide comments to the proposed draft changes to **Amendments to the telecommunications carrier powers and immunities framework—Tranche One.**

Whilst we are advocates for improving the service and infrastructure delivery time and cost to the market, we are also mindful that we need to improve our engagement with the wider community and all stakeholders who are ultimately our customers.



Yours sincerely

