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Our Ref: 3270992

9<sup>th</sup> July 2015

Director  
Construction Policy  
Market Structure Branch  
Department of Communications  
GPO Box 2154  
CANBERRA ACT 2615



Via email: [powersandimmunities@communications.gov.au](mailto:powersandimmunities@communications.gov.au)

Dear Sir

**Re: Proposed regulatory changes to help roll out faster broadband:**

I refer to Philip Mason's email dated 12<sup>th</sup> June, 2015

Horizon Power provides the attached submissions regarding changes to the Telecommunications (Low-impact Facilities) Determination 1997 (Amendment No. 2 of 2015).

Variations in regulations, such as Energy Safety, result in differing equipment standards used by utilities across Australia. Application of the Low Impact Facilities determination will have to vary to ensure safe installations as a result of the changes in equipment standards.

If you wish to discuss any element of our submission please contact Justin Murphy on 08 6310 1756.

Yours Faithfully

A handwritten signature in blue ink, appearing to read "Ted Brereton", with a long horizontal line extending to the right.

Ted Brereton  
**General Manager**  
**Power System Services**

Telecommunications (Low-impact Facilities) Determination 1997 (Amendment No. 2 of 2015) submission:

**1. Name of the party making the submission**

Justin Murphy  
Manager, Asset Management Services

**2. Organisation represented**

Horizon Power

**3. Contact details**

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Email: [Justin.murphy@horizonpower.com.au](mailto:Justin.murphy@horizonpower.com.au)

**4. Submission**

In the amendments to the Telecommunications (Low-impact Facilities) Determination 1997 (Amendment No. 2 of 2015) a definition of Low Impact could not be found. Horizon Power's submission has been based on our understanding of the definition of the term "Low Impact" as follows:

- Visual
- Structural, the ability of the structure and the method of attachment;
- Real estate the assets resides within; and
- Management of the facilities where changes occur over time to both NBN and Horizon Power's facilities

Visual impact of the facility will change. An NBN facility with Low Impact when installed on a "utility structure" may have an overall high impact to the community. This has not been considered specifically with the increased sizing of the facilities.

Structurally the following important matters must be considered, from a community perspective:

- Structural Safety; and
  - the load bearing capacity of the utility structure; and
  - the method of attachment to the utility structure.
- Access Safety by authorised and unauthorised people

Real Estate requirements increase due to the changes proposed for Low Impact Facilities. The loss of the communities' amenity has not been considered.

Management of the facilities;

- The impact of degradation and the costs passed to Horizon Power to maintain the structures; and
- Changes to the facilities by either Horizon Power or NBN Co. The management of the notification and the risks associated.

We therefor request the process of determining whether or not a facility is low impact takes the above matters into account.