



10 July 2015

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

Dear Sir or Madam

Submission regarding Consultation Paper of 12 June 2015: Amending carrier powers & immunities to support multi-technology rollouts of high-speed broadband

Piggy-backing new cables on to existing HFC cables

Section 3.1 of the Consultation Paper on page 7 states that “particularly in HFC areas, it will be necessary to add a cable to an existing overhead cable or a bundle of overhead cables to improve the network. This includes piggy-backing new cables on to existing cables and cable bundles ...”.

Unfortunately what is not appreciated with such an approach is that the existing HFC network was installed in a hurry during 1994/95 and since then has been neglected in terms of maintenance to the extent that it is not uncommon for the lashing wire to be unfurling and in some cases is dangling from the HFC cabling. If new or additional cables are then piggy-backed onto such poorly maintained HFC cabling, the result will be an even more unsightly overhead mess.

New overhead cabling where none currently exists

Section 3.1 of the Consultation Paper on page 7 states that there will be “cabling in new locations (i.e. where there are overhead power cables but no overhead telecommunications cables)”.

The National Broadband Network is supposed to represent next-generation infrastructure. It is totally unacceptable that new overhead telecommunications cables will be installed where currently there is none. Such a plan is decidedly a backward step.

Increasing the allowable HFC bundle diameter to 48mm

Section 3.1 of the Consultation Paper on pages 7 and 8 states the LIFD (Low impact facilities determination) will be amended “to increase the diameter of ‘designated overhead line’ from 30mm to 48mm” and that the visual impact will be limited and hence not that noticeable.

The photo on Page 8 of the Consultation paper is most deceptive! Many power poles throughout Australia are already supporting far more overhead wires and cabling, both power and telecommunications, than is depicted here.

Such examples are shown in the Photo Gallery of www.noaerialnbn.org at <http://www.noaerialnbn.org/styled/index.html>.

Another illustrative example - shown below - is of a typical street scene in an inner suburb of Brunswick in Melbourne, where an old wooden electricity pole (dangerously close to the curbing - a prime target to be hit by a truck) is supporting two HFC pay tv cables, an electricity control cable, a street light and a multitude of electricity and pay tv lead-ins. Any increase in the allowable diameter of the HFC bundle WILL be quite noticeable!



Concluding Comments

The overhead portion of the NBN will in effect become permanent infrastructure. As power companies continue to replace rotting wooden poles with new ones and thereby avoid undergrounding, any slackening of the Low Impact Facilities Determination to allow even more visually intrusive overhead telecommunications cabling will result in a long-lasting disfigurement of our residential built environment. This is of course in addition to the extremely backward step of ever allowing overhead telecommunications broadband cabling in the first place – initially via the HFC of the mid 1990s and then with the NBN (even when it was solely of optical fibre construction).

A few municipalities, e.g. Booroondarra in Melbourne and Haberfield in Sydney, had previously prevented overhead HFC rollout in the mid-1990s by declaring their suburbs to be ‘areas of environmental significance’. Now, with the proposed slackening of the LIFD to allow even larger bundles of overhead cabling coupled with the decision to construct new overhead cabling where none currently exists, these suburbs may now be further visually blighted despite the earlier opposition by residents.

The proposed amendments to the Regulations and the LIFD should be accompanied by a federal plan (not just a policy) to contribute towards the long-term undergrounding of all overhead power and telecommunication infrastructure.

Yours faithfully



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