



Community Engagement Procedure for VHA Deployment

Vodafone Hutchison Australia

Document Information	
Version:	1.4
Document Owner:	Community Relations Manager (Networks)
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Release Date:	28 April 2011
Status:	Final
Approved by:	Marek Ristwej, National Property Manager Acquisition and Continuity
Reviewed by:	Roslyn Young, EME Specialist, Regulatory
Distribution List	All technical staff (VHA & VHA Partners)
Storage:	V:\EMF\VHA EME\EME Policies & Procedures Schedule
Restriction:	C2 for document as a whole excepting Appendix 1 unrestricted as it forms messages for VHA communications on responsible network deployment
Type of document:	EME Communications Procedure
Document No:	EMEC104

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Example of reviewed notification letter

Example of briefing note

Example of advertorial

1. Purpose

The Community Engagement Procedure for VHA Deployment sets out the stakeholder engagement guidelines that VHA staff and Partners are to follow when deploying, upgrading and/or maintaining networks on behalf of VHA.

It includes the requirement to apply relevant legislation and company policy and procedures, to support a planned engagement approach which reflects transparency and responsiveness.

2. Scope

This procedure describes the VHA approach to engaging with external stakeholders and aligns with the Vodafone Group *Responsible Network Deployment* policy. The procedure outlines key accountabilities and processes for both pro-active and re-active engagement with key stakeholder groups including the general public; government agencies; elected representatives; the media; and landlords and property managers.

Appendix 1 – Key Messages for Responsible Network Deployment shall be used as a reference by VHA employees and VHA Partners who are required to develop communication materials or directly communicate on network deployment matters either internally or externally.

Where applicable, the following EMEC10... series documents and their related VHA communications material designed for specific audiences (Fact sheets, web, enquiries, VHA deployment) should be used in conjunction with the Community Engagement Procedure for VHA Deployment.

- EMEC100 – EME Positions and Messages
- EMEC103 - Health and Mobile Phone Technology Staff Awareness & Training.

3. Our Approach to Community Engagement

VHA's aim is 'to be the most recommended mobile operator because each of us offers value to our customers by delivering simple, affordable innovations at the lowest cost.'

This goal is supported by our business strategy and underpinned by VHA's cultural values of:

- Humility with Ability
- Daring and Caring
- Enterprising and Surprising

These values drive our decision-making, our actions and our day-to-day conversations with each other and key stakeholders external to our business.

They support an approach of curiosity and willingness to learn while being honest and open. By keeping things simple and taking calculated risks we can treat everything

decision as an opportunity that allows us to think creatively and find smarter ways of working together. This direct open approach supports firmness in communicating VHA's intent but does not condone any cowboy antics nor accepting every stakeholder's request at face value.

For example, when dealing with community stakeholders with genuine concerns about the location and design of our infrastructure we need to demonstrate a caring, transparent and balanced approach to decision making. When dealing with landlords we need to be humble and enterprising, building mutually beneficial and collaborative relationships wherever possible.

For the sustainability of our network, it's all about developing strong relationships that support our license to operate within the communities of which we are a part.

4. Regulations, Principles and Policies Underpinning our Approach

VHA has adopted the Vodafone Group *Responsible Network Deployment (RND) Policy* to steward VHA's reputation as a responsible network owner. The RND Policy sets out the need for an RND communication and consultation plan and process to address stakeholder concerns and mitigate network deployment issues.

VHA has also adopted the Vodafone Group *Mobile Phones Masts and Health Positions and Messages* policy¹ when communicating on mobile phone technology and health issues. This document applies these Vodafone Group policies and communicates and references the relevant positions and messages in the context of VHA commitments and the Australian environment.

Many of our activities relating to community engagement in the network space are governed by existing Federal, state and local government legislation and regulations. There are also industry codes with which we must comply. The most relevant of these are the *Telecommunications Act 1997* and the *ACIF Code C564:2004 for the Deployment of Mobile Phone Network Infrastructure*.

These policies, supported by our company values underpin the following principles for stakeholder engagement.

Demonstrate Humility

All VHA representatives should behave in a courteous and humble manner when engaging with external stakeholders.

Engage Pro-actively

All VHA representatives should engage openly and proactively with external stakeholders wherever possible.

Behave and Document Transparently

All VHA representatives should document and maintain current records of all planning and execution for engagement activities. These records should demonstrate compliance with all relevant regulatory requirements and company policies and procedures.

¹ Issued December 2009. This document replaces the Vodafone Group EMF Position Statements Framework V3, dated 18.10.06.

Communicate Consistently

All VHA representatives should use VHA position statements and approved communication resources to ensure consistency of message when engaging with external stakeholders.

5. VHA Requirements for Pro-Active and Re-active Engagement

All VHA project works must comply with the *Community Engagement Procedure for VHA*. The following processes must be followed by all VHA staff and partners.

5.1 Community Relations and Engagement Plan

For all VHA network partners/projects, within 30 Working Days of project commencement, a plan (the Community Relations and Engagement Plan) commensurate with the scope of the project must be provided to the VHA Community Relations Manager. The Community Engagement Plan for the Project identifies the key audiences (stakeholders) who will be involved and establishes the process for both pro-active and re-active engagement with these stakeholders (e.g. property owners/managers, site neighbours, the general public, local council, elected representatives and the media in relation to the Project site activities)

Any such plan must:

1. demonstrate how the *Community Engagement Procedure for VHA* will be applied for the Project;
2. identify and apply pro-active and stakeholder identification and engagement strategies at a project-wide and site-specific level, relevant to community expectations and the expected level of concern;
3. include assistance with detailed risk analysis at project planning level to determine where possible to avoid or better manage sensitive areas and minimise site acquisition risks. The Vodafone "Sensitive Site List"² and the "Traffic Light Model for Public Consultation"³ should form the basis for determining engagement strategies for new and existing site upgrade works particularly where activity external to the cabin will be undertaken;
4. where indicated by the Project scope and deliverables, include assistance with detailed risk analysis to occur in respect of every site to determine notification/consultation needs at or above that required by Law. Further information and support relating to site history or the application of the Traffic Light Model can be sought from the Community Relations Manager during the development of the Community Engagement Plan with sensitive site management documented and then escalated to the Project Manager for review;
5. provide management protocols, accountability and escalation frameworks and reporting for problem sites to VHA in accordance with the *Community Engagement Procedure for VHA*; and
6. indicate a willingness to participate in VHA's collective strategy development and application for sites which impact on the interests and reputation of VHA.

² Sensitive Site List: A list of historically sensitive Vodafone Network sites based upon community opposition, difficult landlord and promises made to stakeholders. This list is updated quarterly by the Community Relations Manager and is stored within Track 3G.

³ Traffic Light Model: A site rating system using traffic light colours. The green, amber or red categories provide information that show whether a site may be considered sensitive from a community or planning perspective (Ref MCF Site Deployment Consultation Handbook, 2003).

The *Community Relations and Engagement Plan* may be documented in accordance with the template provided within Appendix 2.

5.2 Escalation Requirements

- [Proactive] All high risk activities should be escalated to the VHA Community Relations Manager for approval prior to works proceeding. The escalation is to include background information and proposed engagement/communication recommendation for assessment and approval;
- [Reactive] VHA must be notified within 24 hours of becoming aware of any relevant community consultation or engagement issue of a significant or potentially significant nature in relation to a Site;
- [Reactive] As soon as practicable a report must be provided to VHA incorporating all background information to any stakeholder issue and the proposed engagement/communication recommendation for assessment and approval, and any further information requested specifically by VHA;
- VHA partners must not resolve or attempt to resolve any stakeholder issue outside the bounds of the agreed Community Relations and Engagement Plan;
- VHA Partners must not answer any media enquiry relating to any Site without the prior approval of VHA;
- VHA Partners must notify VHA within 24 hours of becoming aware of any of the following activities which arises out of or relates to site procurement activities:
 - any dispute or potential dispute with any Government Agency;
 - any dispute or potential dispute with any owner or occupier of land;
 - any mention of VHA in media or requests for information from media, related to Site deployment or maintenance;
 - any complaint made to the TIO, ACMA, Department of Broadband, Communications and the Digital Economy and the Arts or other Government Agency; or
 - any objection to a notified activity being received (whether or not the same comprises an objection inhibiting the carrying out of the activity for the purposes of the Telecommunications National Code 1997),
- VHA Partners must not, without the prior approval of VHA:
 - launch an appeal or challenge the status of an existing or planned facility (as that term is defined in the Telecommunications Act) under any Law;
 - commence or continue any site procurement activities on any site which is or may become subject to any litigation or regulatory challenge; or
 - commence or continue any dispute with, or refer any matter to, a Government Agency; and
 - terminate an ACIF-related inquiry from a member of the community on the basis of it being vexatious.

5.3 Communication and Training Requirements

- VHA staff and Partners when representing VHA are to use VHA approved communication tools and resources without exception and training should be provided to familiarise all parties with these prior to visiting site or engaging with stakeholders.

- All persons representing VHA in an engagement capacity must receive training and have relevant experience in risk communications.
- As a general approach, all first responses to queries concerning mobile networks and health should be accompanied to references from authoritative sources including WHO, ARPANSA, ACMA, EMF Explained and AMTA/MCF.

5.4 Specific Stakeholder Group Requirements

Different stakeholders require different engagement approaches. The following provides guidance on VHA expectations for representatives engaging with key stakeholder groups. Specific stakeholder group requirements include:

- General Community
 - Appropriate specialists must be engaged to assist in community consultation activities, where required (i.e. independent EME specialist, RF engineers);
 - Approved communication tools and resources are to be used without exception when dealing with the public and responding to requests for further information;
 - All information requests or responses to a member of the public are to be followed-up to ensure issues or concerns have been adequately addressed or escalated where required;
 - The VHA Community Relations Manager should be notified to provide additional support where appropriate/required.
- Local Councils
 - All VHA representatives must proactively build strong relationships with local government authorities and key related stakeholders groups. This may include proactively advising them of deployment plans at a strategic and site-specific level. This applies in all instances including where local government authorities are landlord/property managers and or ACIF stakeholders or consenting authorities.
- Elected Representatives (Federal, state, local, community groups)
 - It is expected that Vodafone Community Relations Manager will take a lead role in consultation and engagement exercise with State and Federal politicians and prominent Local Councillors and other community leaders.
 - VHA encourages proactive engagement strategies with local political representatives where required, in consultation with the Vodafone Community Relations Manager.
- Media
 - All media enquiries in respect to deployment activities are to be escalated to the VHA Community Relations Manager for response. The information should include the contact details of the journalist, nature of the enquiry and deadline for the response and any relevant background information that will assist in preparing a formal response. In the unlikely event the VHA Community Relations Manager is not available the Head of Corporate Affairs may be contacted.
 - Under no circumstances are VHA staff or Partners to provide a response to a media enquiry on VHA's behalf. The journalist should be advised that the appropriate VHA representative will be directly in contact to provide a response to their enquiry.
 - Note: VHA has internal policy and procedures in place for the handling of media enquiries that are not detailed in these guidelines.

- Landlords and Property Managers
 - All VHA representatives should be humble and open in their approach with existing and prospective landlords and property managers to build mutually beneficial relationships and a solid foundation for our network.
 - Note: Engagement with landlords and property managers should be informed by the VHA Property Strategy.

5.5 Additional Compliance Requirements

In addition to relevant regulatory obligations and the company policies cited above:

- All site selection works should be undertaken in accordance with EMEP005 VHA ACIF Code Precautionary Approach to Site Selection;
- For existing sites, a desktop review of the “Sensitive Site List”⁴ should be undertaken. For new sites, the desktop review should also include other carrier sensitive sites (within Google Maps), MCF combined carrier search rings, AMTA media clips, online directories, council websites and aerial maps all of which should be supplemented by risk assessment activities during site visits
- All construction design works should be undertaken in accordance with the MCF Best Practice for Visual Design Guidelines and documented accordingly. Vodafone adopts the Mobile Carriers Forum (MCF) Base Station Design Guide Tool in assessing the potential visual impacts of its installations and considers recommendations made by this tool to mitigate any visual impacts in siting and design of its facilities. Measures taken include:
 - Selecting sites that are least intrusive but still meet the radiofrequency service objectives for the area.
 - Special designs of antennas and mounting structures in the form of shrouded rooftop chimneys and sewerage vent shafts.
 - Flush mounted designs and colour matching of installations to its background.
 - Adoption of colours to suit its visual setting for new structures such as monopoles;

The Vodafone RAN Design and Construction Guidelines specifically require that Vodafone site design principles must, subject to the RF and Tx design and relevant OH&S legislation, be noted as points for consideration and where possible incorporated in the site design including, where possible:

- Colour match and flush mount antennas wherever possible to achieve clean lines.
- Reduce sky lining wherever possible by setting antennas back from edge and establishing consistent heights for equipment where multiple antennas are present.
- Install shrouds (tuft antennas) and screening wherever possible in particular sites within or adjacent to residential areas.
- Integrate associated equipment such as cabling, cable trays and equipment cabins and cabinets wherever possible by choosing appropriate colours i.e. colour matching or efficiently encasing visible cabling efficiently encasing visible, excess or unmatched cabling, and hiding, matching and aligning cable runs.

⁴ Sensitive Site List: A list of historically sensitive Vodafone Network sites based upon community opposition, difficult landlord and promises made to stakeholders. This list is updated quarterly by the Community Relations Manager and is stored within Track 3G.

- Minimise the visibility of OH&S requirements wherever possible by siting OH&S equipment and considering alternative design and equipment options.
- All industry (MCF) developed tools and training must be employed and delivered as requested by VHA;
- All works undertaken on site should be undertaken in a manner that minimises disturbance to the surrounding area.

6. Community Engagement Responsibility and Escalations Matrix

Party	Tasks
VHA Partner – Community Relations/Project Manager	Accountability for VHA Partners will be specific to the scope of works but will broadly include: <ul style="list-style-type: none"> • Development and maintenance of the project Community Engagement Plan in consultation with VHA; • Quality control assessment of engagement practices and procedures in accordance with the approved Community Engagement Plan and EMEC104; • Escalation and reporting of community consultation and engagement issues and management of escalation issues in accordance with the Community Engagement Procedure for VHA; • Training of community facing team members in risk communications and VHA approved messaging; • Primary contact point for community relations issues directed from VHA; • Provision of contact details for key team members of VHA Partner-CR/PM function.
VHA Community Relations Manager	<ul style="list-style-type: none"> • Provision of training and guidance for community consultation and engagement issues where required • Development of communications tools and consultation procedures • Quality control assessment of consultation practices and procedures • Review and input into site-specific and special community consultation strategies when escalated • High level support and guidance on community consultation and engagement issues when escalated • Handling media enquiries in accordance with internal Vodafone procedures • Handling enquiries and issue raised by state and federal politicians • Handling of enquiries from the public who insist on direct contact with a Vodafone official

VHA Contacts:

First point of contact for all issues:

Sarah Whittington (Trudy Schmidt from July 2011) VHA Community Relations Manager

Ph: 1300 302 703 (0414 696 999) E: sarah.whittington@vodafone.com.au

Second point of contact for media enquiries:

Greg Spears, VHA Head of Corporate Affairs

Ph: 0406 315 014 E: greg.spears@vodafone.com.au

7.0 VHA ACIF Code C564:2004 Response Procedure

Sections 5.4, 5.5 and 5.6 of the ACIF 'Code for the Deployment of Mobile Phone Network Infrastructure' (ACIF Code) (ACIF C564:2004) detail requirements for carriers to seek and consider feedback from Council and Community in relation to installations at new and existing sites, where development consent is not required.

The ACIF Code outlines specifically the requirements placed upon a carrier to develop a consultation plan including the time within which stakeholders may make comment, and to provide a report to Council detailing the submissions/queries received and responses made during an ACIF consultation activity.

VHA provides the following written procedure for the handling of responses made during ACIF Code consultation activities and for general enquiries relating to VHA network infrastructure from external stakeholders, relating to network deployment and/or maintenance activities.

VHA Guidelines for responses during ACIF Code activities

Any enquiry received by VHA or its partners during ACIF Code consultation activities should be acknowledged within 24 hours of its receipt and should be responded to no later than 5 business days from the end of the consultation period (last date of submissions received). A response may be made prior to the end of the notification period where appropriate.

VHA Guidelines for general responses

Any enquiry received by VHA or its partners should be acknowledged within 24 hours of its receipt and should be responded to no later than 5 business days from the date of acknowledgement. If information is not available within these timeframes the stakeholder should be kept informed of the progress of the response at least once a week until the formal response is provided and closed.

8.0 VHA ACIF Code C564:2004 Complaints Procedure

Section 7.2 of the ACIF 'Code for the Deployment of Mobile Phone Network Infrastructure' (ACIF Code) (ACIF C564:2004) requires a carrier to develop a written complaints handling procedure. This information must be made available to the public and the carrier must ensure that staff receive training in the procedure.

VHA provides the following written procedure for the handling of complaints received from external stakeholders relating to network deployment activities.

VHA Complaints Handling Procedure for Network Deployment

- Any formal complaint received by VHA must be referred to and dealt with only by VHA's Community Relations Manager. Any referral should be made within 24 hours of receiving a complaint. The Community Relations Manager should engage internally with VHA stakeholders as required to respond to a complaint and seek legal approval of any complaint response before it is made.
- In accordance with Section 7.3 of the ACIF Code, any complaint received by VHA, or its partners must be acknowledged in writing within 10 working days of the receipt of the complaint. This may be undertaken by the partner upon instruction by VHA's Community Relations Manager.
- In acknowledging a complaint, VHA must clearly acknowledge whether the complaint will be further investigated and if so, provide a milestone date for a response detailing the outcome of any investigation, within 15 business days from the date of acknowledgement.
- Should VHA find the complaint to be vexatious and decide not to undertake further investigation a response confirming this decision should be provided, as detailed in the point above, and VHA should record this decision and advise the complainant of the availability of external options should they be dissatisfied with VHA's response e.g. referral of the complaint to the ACMA as detailed within Section 7.3.6 of the ACIF Code.
- Following an investigation, VHA must provide written advice confirming the outcome of any complaint investigation, detailing any actions to be taken and advising the complainant of the availability of external options should they be dissatisfied with VHA's response e.g. referral of the complaint to the ACMA as detailed within Section 7.3.6 of the ACIF Code.

VHA's Community Relations Manager should keep a central record of complaints made to VHA, detailing a record of the complaint and any decisions/actions made in relation to the complaint. The record should also detail any outcomes following referral of complaints to any other external stakeholder.

9.0 VHA Internal Escalation Procedure for Community Relations Escalations

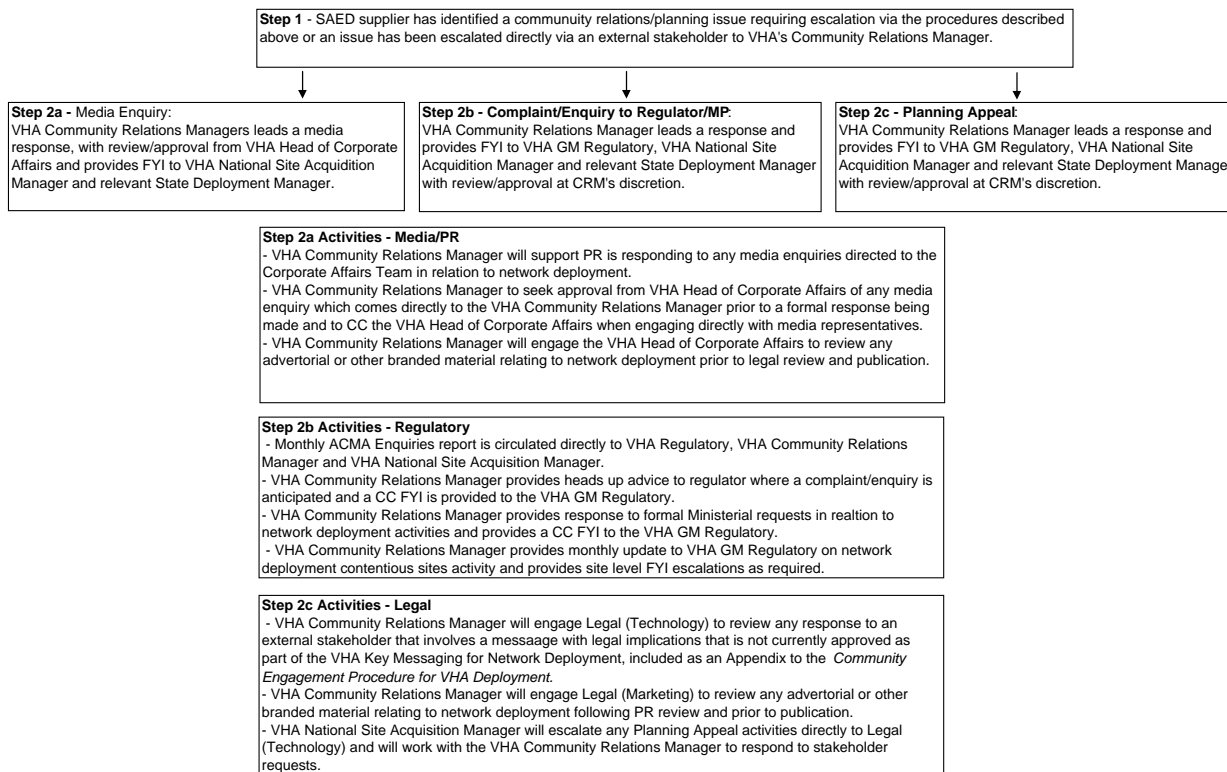
VHA INTERNAL COMMUNITY RELATIONS ESCALATIONS PROCESS

1.0 SAED Partner Delegations & Escalations to VHA

SAED ASP has delegation to acquire and design a proposed Site Candidate in so far as engagement with external stakeholders complies with the Community Engagement Procedure for VHA Deployment. The **SAED Delegations and Escalations Process** and the **Community Engagement Procedure for VHA Deployment** describe escalation processes for SED partners to VHA. The proposed escalation path below describes the necessary internal VHA engagement required for sensitive sites, once escalated to the VHA Community Relations Manager.

2.0 Proposed VHA Internal Escalations Path

2.1 Escalations Process Flow Chart



10.1 Appendix 1 VHA Responsible Network Deployment Positions and Messages

This Appendix contains straightforward language for responding to submissions and enquiries from stakeholder and communicating Vodafone's policy on each aspect of RND.

1. Generation of new VHA RND material for external publication and use.

The VHA Community Relations Manager is responsible for ensuring that all external written material generated for VHA on RND is aligned with the *VHA RND Positions and Messages*. Any new VHA RND key messages must be cleared for technical alignment and approved by VHA Corporate Affairs and Legal teams before public release.

2. Direct Application of VHA RND Positions & Messages for Communications

For external use, VHA staff and VHA Partners may use:

- Communications material directly extracted (i.e. unchanged) from this document without further clearance.
- Any VHA published Fact Sheet, VHA website material, Q&A material generated from the EMEC10... series
- Material extracted or printed in pdf format from *Vodafone EMF Toolkit* messages pages. Any instructions provided on Vodafone positions in the Toolkit Alerts must be followed.
- Terminology to suit local conditions and audience reply: In Australia the terms Radiofrequency (RF) and Electromagnetic Energy (EME) are generally used in preference to Electromagnetic Fields (EMF). Because many quotes from international health advisory bodies use the term EMF, the following annotation is advised for VHA text outside of the quote: "*electromagnetic fields (EMF, alternatively referred to as RF or EME)*". When responding to a member of the public, if the term *electromagnetic radiation (EMR)* is raised by them, then the following annotation should be used: "*electromagnetic radiation (EMR, alternatively referred to as RF, EME or EMF)*".

Although Vodafone is referenced as the entity in the following position statements 3GIS should be substituted when works are specific to that network entity.

3. Vodafone RND Positions

Our Approach to RND

As part of our global commitment to responsible deployment, Vodafone applies the principles of safe systems, consultation and sensitive environmental planning, good design and environmental protection to all its base station network development and operations.

Our Approach to Network Planning and Design

In accordance with the requirements of the ACIF 'Code for the Deployment of Mobile Phone Network Infrastructure' (ACIF Code) and Vodafone's site selection and design procedures, a precautionary approach to site selection and design is adopted for all

proposals. Site selection and design requires the assessment of a number of issues and competing interests in order to identify the most socially and environmentally friendly solution. Where possible we will co-locate on existing facilities and public utility structures or use existing structures. We will incorporate best practice design to minimise the social and environmental impacts of our network facilities.

Our Approach to Consultation and Engagement

Vodafone is committed to ongoing consultation and sensitive environmental planning. This commitment is reflected in Vodafone's support for the development and implementation of the ACIF 'Code for the Deployment of Mobile Phone Network Infrastructure' (ACIF Code). Vodafone is committed to communicating proposals to the public including the details of site assessment and selection. Vodafone welcomes all submissions and examines all issues raised, endeavouring to respond promptly to any community concerns. Where we can, we will make adjustments to proposals as we believe that the best outcomes are achieved when we work together and local input is considered.

Our Approach to Health and Safety

Community health and safety is paramount to Vodafone. Vodafone applies a strict policy of building and operating its base stations within the limits of National health and safety standards, applying the objective of minimising radiofrequency fields (RF) whilst meeting service requirements. Exposure level calculations for both existing and proposed base stations are available to the public (www.rfnsa.com.au).

Vodafone staff and Partners should refer to EMEC100 – EME Positions and Messages for specific Health and Safety position statements relating to EME.

4. Vodafone RND Key Messages

This section is structured to assist in answering frequently asked questions from interested parties (stakeholders).

Our approach to RND

Does Vodafone value their corporate reputation when deploying sites?

Vodafone values our reputation as a responsible business and seeks meaningful consultation and dialogue with the communities in which we operate. We work with our network deployment partners to ensure our activities are undertaken in an open and transparent manner and in accordance with regulation.

How do mobile telecommunication networks work?

Mobile phones work by sending and receiving low power radio signals. The signals are sent to and received from antennas that are attached to radio transmitters and receivers, commonly referred to as mobile phone base stations. The base stations are linked to the rest of the mobile and fixed phone networks and pass the signal/call on to those networks.

To provide a good quality mobile service, base stations need to be located where people use their mobile phones. A mobile network is typically designed on a "cell" basis covering a small geographic area. Base stations are located either in the centre or on the edge of a cell. The number of base stations required for a given area will depend on the terrain and number of people using mobile devices.

Each base station has a finite capacity to cater for simultaneous calls and data exchange. The more people using mobile phones, the more capacity is required and

this usually means more base stations closer together. Mobile networks must be designed according to the local population and number of people using the network.

Refer to the <http://www.emftoolkit.com/?ID=25195> for more information.

Reference can be made to EMF Explained <http://www.emfexplained.info/?ID=25195> for more detailed, publicly available information.

What are 2G and 3G networks?

3G or third generation networks can utilise the radio frequency spectrum more efficiently than 2G. Unlike 2G where a single frequency is allocated to the call, 3G enables the call information to be securely passed along a bandwidth of frequencies. 3G handsets can use all available frequencies even ones from neighbouring base stations. This provides improved performance in voice quality and data rates. Some people call 3G “mobile broadband” because the evolution is similar to the difference between dial up internet and the always available broadband internet services.

Refer to the <http://www.emftoolkit.com/?ID=25196> for more information.

Reference can be made to EMF Explained <http://www.emftoolkit.com/?ID=251966> for more detailed, publicly available information.

Do we really need 3G technology?

3G networks can send data at much higher speeds than 2G networks, which means that in addition to audio, graphics and text, we can also send and receive video and email and enable the delivery of the internet to wireless devices such as mobile phones – including smartphones and Blackberry devices – and wireless computers. 3G technology is also used for mapping and GPS as well as medical monitoring.

In Australia, the last decade has seen continued growth in the use of mobile network services for voice calls, and now data. Given the number of mobile customers and the increasing demand for 3G services, there is a need for increased network capacity to cater for the amount of voice and data traffic on mobile networks, particularly during daily busy (peak) periods.

What are the trends in demand for access to mobile technology?

Mobile phones have become part of our everyday life. The convenience of being able to communicate with who you want, when you want, from wherever you want has become part of our modern lifestyle. Mobile phones and mobile services have become so popular that we need to keep upgrading and expanding our facilities.

In Australia, the last decade has seen continued growth in the use of mobile network services for voice calls, and now data. Given the number of mobile customers and the increasing demand for 3G services, there is a need for increased network capacity to cater for the amount of voice and data traffic on mobile networks, particularly during daily busy (peak) periods.

How does Vodafone assess capacity need and network planning requirements?

Vodafone is committed to maintaining excellent coverage and quality service, particularly in high usage areas. To do so, we need to look at ways to add additional network infrastructure, including additional base stations.

We identify network needs in a number of ways to meet customer demand for coverage and provide seamless customer experience. Customer demand is measured using drop-out rates and customer feedback.

For our 2G network, upgrades are identified and prioritised dependent on capacity needs at individual sites. Upgrades for our 3G sites are based on building and extending the model network plan from our 3G joint venture with Optus. This initial 3G model network plan ensured that we only built additional 3G base stations where there were gaps in the existing Vodafone and/or Optus network.

Can you explain the need for a new or upgraded base station?

Mobile phones have become part of our everyday life. The convenience of being able to communicate with who you want, when you want, from where you want has become part of our modern lifestyle.

Increasingly people are using advanced multimedia services such as video calls, mobile internet, email and television or mapping and GPS applications made available by 3G. Mobile phones and data services have become so popular that we need to keep upgrading and expanding our facilities.

New mobile network base station facilities are driven by increasing capacity requirements during busy times, the need to fill coverage gaps, and to ensure Australians have real choice in their mobile telecommunications provider. Vodafone is committed to maintaining excellent coverage and quality service to the Australian community, particularly in high usage areas. To do so, we need to look at ways to add additional network infrastructure, including additional base stations.

Furthermore, people are increasingly relying on the quality of mobile services in cases of emergency. According to the latest statistics from the Australian Communications and Media Authority (ACMA) mobile phones now account for two-thirds of all calls to emergency services in Australia.

Further reference should be made to the specific need for the proposal.

What limits the coverage of a mobile base station?

In essence, a mobile phone needs to have 'sight' of a mobile phone base station antenna. Radio signals essentially travel in straight lines and are attenuated (reduced in strength) as they pass into a building. For good quality coverage (for example inside buildings) the radio signal from the phone to the base station needs to be uninterrupted. Hills, trees and tall buildings can obscure this line of sight and so base stations need to be very carefully located to maximise the coverage available.

The coverage provided by each cell must partially overlap that of its neighbour, to ensure that there are no breaks in radio coverage. As you travel, the base station in one cell detects a weakening of the signal and hands the call over to the next one. A gap in cells would result in a "dropped call" mid conversation or a "drop out" during data downloads.

Refer to the <http://www.emftoolkit.com/?ID=25196> for more information.

Reference can be made to EMF Explained <http://www.emfexplained.info/?ID=25196> for more detailed, publicly available information.

Further reference should be made to the specific constraints for the proposal.

How does Vodafone prioritise new network sites and upgrades? / Why won't Vodafone install a new base station to provide coverage to my local area?

Mobile phones have become so popular that we need to keep upgrading and expanding our facilities. Vodafone takes a careful and considered approach in selecting locations for our base stations and upgrades to provide a reliable mobile communications network, without compromise to the community and, its safety.

Priority locations and upgrades are identified in a number of ways and are dependent on network plans. For our 2G network, upgrades are identified and prioritised dependent on capacity needs at individual sites. Upgrades for our 3G sites are based on building and extending the model network plan from our 3G joint venture with Optus. This initial 3G model network plan ensured that we only built additional 3G base stations where there were gaps in the existing Vodafone and/or Optus network.

How does this site fit into future network plans for the wider area?

Provide a customised response in terms of the deployment / upgrade of the new network facility and address coverage/capacity problems.

When will Vodafone choose to abandon a proposal?

Vodafone will choose to abandon a proposal when:

- Network and coverage needs change and deem the proposal unnecessary;
- A proposal is deemed unsuitable by Vodafone, following consultation with local stakeholders; or
- A proposal is deemed unsuitable by the relevant planning authority or after judicial review.

Will Vodafone need to upgrade this site in the future and what impacts will that have?

The following response assumes that no plans are in place.

At this point in time, Vodafone has no plans to make additional modifications to this site. However we cannot predict the future network and data traffic requirements for this facility and therefore are unable to provide assurance that no modifications will be necessary.

In general, modifications to a mobile telecommunications facility outside of standard maintenance work are required as a result of:

- the need to support additional data traffic;
- the need to fine tune/modify the coverage provided by the facility; and/or
- the availability of new technology.

See the section below titled 'Common questions about the CONSULTATION' for responses relating to the process for consultation when upgrading sites.

Don't newer technologies use more power, emit higher levels of electromagnetic fields and result in more energy intensive networks?

The Australian Communications and Media Authority (ACMA) has produced a fact sheet on electromagnetic energy (EME) and 3G mobile phones which explains that the EME emission levels produced by 3G transmitters are low, and also significantly lower than the power levels of some other common types of transmitters such as two-way radios used by taxis and emergency services. For example, a 3G mobile phone base station antenna radiates a little more than one-tenth of the power of a taxi's two-way radio.

This fact sheet continues to say that the reason for the low antenna power is that the 3G network has been enhanced through the use of smart technology and improved network design. Radiated power levels are further reduced by the use of adaptive power control – a technology that continually adjusts radiated power levels to the lowest level necessary to obtain radiocommunication.

Reference can be made to ACMA fact sheet – Electromagnetic energy and 3G mobile phones

http://www.acma.gov.au/webwr/_assets/main/lib310037/electromagnetic%20energy%20and%203g%20phones%20-%20fs34.pdf for more detailed, publicly available information.

Will Vodafone make public the commercial agreements in place for this site?

Commercial agreements are confidential in nature and cannot be made public.

When and how will Vodafone serve notice to occupy a site?

Vodafone always seeks to negotiate with site owners. In certain instances it may be necessary for Vodafone to exercise statutory powers to install a facility. These instances could include cases where there is a restriction on the site owner to grant a lease or licence or where network demands and priorities make it necessary for Vodafone to act in a timely fashion. In all cases Vodafone continues to seek an acceptable occupation agreement.

Further reference should be made to the proposal if appropriate.

What does a typical construction schedule for a new base station involve?

Construction only occurs after all planning approval requirements have been met. A typical construction schedule includes:

- Procurement (ordering equipment and materials);
- Site preparation (clearing, fencing foundations);
- Pole / Tower / Mount installation;
- Shelter installation;
- Rigging antennas and feeders;
- Installation of equipment units; and
- Testing and commissioning.

The timing for each step in the construction process is dependent upon landlord consultations, the supply of equipment and Vodafone's wider network needs.

What is a typical base station life cycle?

Our general leasing arrangement for a typical base station is 20 years. Technology (900GSM or 1800 GSM 2G v 3G) is typically renewed every 3-5 years depending on the site.

Why is this site classified as a low-impact facility?

The term 'low-impact' is a legal term derived from the Telecommunications (Low-impact Facilities) Determination 1997 (the Determination) where it refers to certain facilities or types or equipment that can be carried out by carriers without the need for local and/or state planning approval as long as the activity complies with the provisions of the Determination.

Section 1.2 of the Determination identifies certain facilities that cannot be low-impact facilities as follows:

"Under subclauses 6 (4), (5) and (7), certain facilities cannot be low-impact facilities:

- designated overhead lines;
- a tower that is not attached to a building;
- a tower attached to a building and more than 5 metres high;
- an extension to a tower that has previously been extended;
- an extension to a tower, if the extension is more than 5 metres high."

Further reference should be made to the proposal.

Why does the Determination not include electromagnetic fields exposure levels and health concerns as criteria for excluding sites as Low-impact?

All telecommunications facilities must meet the radiofrequency (RF) exposure levels set in the ARPANSA Standard (RPS3 2002) regardless of their classification under the Telecommunications (Low-impact Facilities) Determination 1997 (the Determination). The term 'low-impact' is a legal term derived from the Determination and is based on visual and planning issues. RF (EME) exposure and health regulation is addressed through the ARPANSA Standard and the Australian Communication Media Authority's (AMCA) Radiocommunications Conditions (Apparatus Licence) Determination 2003.

What planning approval processes are carriers subject to when deploying their networks?

Under the Telecommunications (Low-impact Facilities) Determination 1997 (the Determination) carriers are exempt from local and state planning approval processes for certain facilities, or types or equipment that are undertaken in compliance with the provisions of the Determination.

Notwithstanding, carriers have an obligation to undertake community and stakeholder consultation in accordance with the Telecommunications Code of Practice 1997 and the ACIF 'Code for the Deployment of Mobile Phone Network Infrastructure' (ACIF Code).

In cases where works do not fall within the 'low-impact' classification, carriers have an obligation to follow the applicable local, state, and/or commonwealth planning laws and obtain the relevant planning approvals.

Our Approach to Network Planning and Design

What principles govern Vodafone site design?

The Vodafone design and construction manual is the primary tool governing Vodafone site design. The manual requires the balanced consideration of all aspects of site design.

Secondarily Vodafone adopts the Mobile Carriers Forum (MCF) Base Station Design Guide Tool which guides the telecommunications industry on best practice site design. The guidelines assist carriers to achieve better site design and resulting visual outcomes.

For more information see <http://www.mcf.amta.org.au/pages/MCF.Achievements>.

What is considered in a precautionary approach to site selection?

A precautionary approach to site selection and design was adopted for this facility with due consideration given to a range of issues including but not limited to:

- Council and community feedback and local community sensitive locations;
- Visual impact, related heritage significance and unique terrain of the surrounding area;
- The minimisation of public exposure to electromagnetic energy from the facility;
- Relevant federal, state and local planning policies;
- Existing availability of land and access to public utilities;
- The need for network coverage, avoidance of radiofrequency interference to other services and vice versa and the availability of transmission to connect facilities to the network; and
- Opportunities to co-locate facilities.

How are the considerations weighted?

In selecting a site, a considered and transparent attempt is made by Vodafone to balance all the issues considered.

How do we identify sensitive sites?

These are identified through desktop assessments such as searching Vodafone's internal databases, online directories, council websites and aerial maps and also during site visits.

What limits network performance in any given area?

To provide a good quality mobile service, base stations need to be located where people use their mobile phones. A mobile network is typically designed on a "cell grid" basis covering a geographic area. Base stations are located either in the centre of each cell or on the corner of a group of cells.

The number of base stations required for a given area will depend on the terrain and number of people using mobile phones. The radio signals that base station antennas transmit are primarily transmitted from the centre of the antenna outwards. This means that the antennas need to be placed in locations where there are no obstructions, such as building rooftops and masts.

In built-up and mountainous areas with many buildings, trees and obstructions, it is likely that more base stations will be required to provide service to the local community. In rural areas with fewer obstructions, less base stations will be required.

Refer to the <http://www.emftoolkit.com/?ID=24794> for more information.

Reference can be made to EMF Explained <http://www.emfexplained.info/?ID=24794> for more detailed, publicly available information.

How will Vodafone address heritage considerations for low-impact facilities?

Vodafone will ensure any proposal for a low-impact facility complies with provisions in the Telecommunications (Low-Impact Facilities) Determination 1997 (the Determination). Pursuant to the definitions and objectives of this legislation, a low-impact facility will not be located within an 'area of environmental significance'.

In developing a proposal for a low-impact facility, Vodafone will endeavour to strike an appropriate balance between preserving the heritage values of the wider area and the provision of improved communications services.

How does Vodafone consider options for co-location?

Once the requirement for a new site is determined Vodafone conducts searches of the Australian Communications and Media Authority (ACMA) and Radio Frequency National Site Archive (RFNSA) databases to identify co-location opportunities. These sites are then assessed along with any other candidates against network performance criteria. If a co-location site is likely to provide the required coverage the candidate will be further assessed against environmental planning and property considerations. Vodafone's preference is to co-locate its facilities with those of other carriers or infrastructure providers. This minimises the amount of new infrastructure that is deployed in the environment and in most cases facilitates cost and time effective network solutions.

Why can't Vodafone always co-locate on public utility structures like power poles, water reservoirs or within rail corridors?

It is important to note that the load bearing capacity and voltage carried by individual power poles will have an impact on the suitability for holding additional loads such as mobile facility antennas.

Vodafone currently occupies a large number of public utility structures for siting mobile telecommunications infrastructure. During site selection Vodafone will seek to identify as many candidates as possible, with the expectation that further agreement with

landlords might be reached should an appropriate site be identified. Vodafone recognises that such agreement may not always be possible or within their control.

How will Vodafone manage graffiti on this facility equipment?

Vodafone will manage any graffiti on our property or facilities by:

- Investigate and clean graffiti, in response to complaints from property owners, the public, council or from other third parties.
- Proactively clean graffiti during the annual maintenance – as found while on site.

How will this site impact the value of my property?

Unlike a transmission line or power easement, installations such as mobile phone facilities such as that proposed here do not materially affect the ability of adjoining landowners to develop or deal with their properties. There is no physical impediment imposed on neighbouring properties. There is no evidence to show that mobile phone installations have negative impacts on property values.

In visually sensitive areas Vodafone takes additional measures such as incorporating shrouding or screening and undertaking special designs to minimise the visual intrusiveness of installations. Colour matching of installations or adopting most appropriate colours to suit the existing visual setting is also undertaken.

How have Vodafone assessed and responded to the visual impact resulting from this site?

Vodafone adopts the Mobile Carriers Forum (MCF) Base Station Design Guide Tool in assessing the potential visual impacts of its installations and considers recommendations made by this tool to mitigate any visual impacts in siting and design of its facilities. Measures taken include:

- Selecting sites that are least intrusive but still meet the radiofrequency service objectives for the area.
- Special designs of antennas and mounting structures in the form of shrouded rooftop chimneys and sewerage vent shafts.
- Flush mounted designs and colour matching of installations to its background.
- Adoption of colours to suit its visual setting for new structures such as monopoles.

How have Vodafone assessed and responded to the noise pollution resulting from this site?

The only noise emitted from mobile phone facilities is that from air conditioning units. These airconditioning units are similar to those used in residential properties.

Where air-conditioning units are likely to be audible, above acceptable limits, Vodafone will ensure that appropriate measures are put in place to reduce noise. Measures can include redesigning the airconditioning to use split systems or to installing a baffle to reduce the noise output.

How have Vodafone assessed and responded to the increased risk of lightning strike and potentially bush fires resulting from this site?

Mobile phone installations such as antennas, monopoles and lattice towers do not increase the risk of lightning strike at a particular location. Lightning conductors and earthing are installed for taller structures such as monopoles and lattice towers to neutralise any effects in the event of a lightning strike.

How is Vodafone managing the likely environmental impacts of their network such as waste and water?

Vodafone has strategies and action plans in place to improve the energy efficiency of our network and increase the reuse / recycling of telecommunication equipment, battery and civil waste from our network upgrade and construction activities.

We are measuring these impacts and working with our network partners to monitor and manage these impacts.

How have Vodafone assessed and responded to the likely RF interference (TV/radio) resulting from this site?

Similar to other telecommunications carriers and broadcasters Vodafone is licensed to operate at specific frequencies under licensing requirements and regulations set by the Australian Communications and Media Authority (ACMA). Radio and television broadcasters and others who use radio systems such as emergency and taxi operators also operate under specific frequencies and licensing requirements. As such, the frequency from the proposed base station is not expected to interfere with other radio frequencies such as TV and radio.

Also, there are national and international standards governing all forms of electronic equipment regarding the interference that such equipment produces and, in turn, its immunity to interference from outside. Any equipment compliant with these standards is unlikely to suffer or cause interference.

If a member of the public contacts Vodafone in relation to interference of equipment with a base station, Vodafone will investigate the matter and take appropriate action as required.

Our Approach to Consultation and Engagement

What is Vodafone's approach to community engagement and consultation when deploying networks?

Vodafone is committed to ongoing consultation and sensitive environmental planning. This commitment is reflected in Vodafone's support for the development and implementation of the ACIF 'Code for the Deployment of Mobile Phone Network Infrastructure' (ACIF Code). Vodafone is committed to communicating proposals to the public including the details of site assessment and selection.

Vodafone welcomes all submissions and examines all issues raised, endeavouring to respond promptly to any community concerns. Where we can, we will make adjustments to proposals as we believe that the best outcomes are achieved when we work together and local input is considered.

Vodafone's commitment to a proactive and transparent approach to engagement is reflected in Vodafone's support of the development of the ACIF Code. This Code was developed to increase the transparency and accountability of carriers and develop increased consultation with the community on the placement of base stations and other network infrastructure.

The ACIF Code ensures you can have your say when low-impact facilities are to be installed in your area. The ACIF Code also sets out what you can do if you have a complaint about a mobile base station, or a phone carrier's adherence to the Code. A copy of the ACIF Code can be obtained from the Australian Communications and Media Authority (ACMA) <http://emr.acma.gov.au/code.htm> or at www.acif.org.au/documents/codes and scroll down to C564_2004.

Where appropriate activities include consultation with local planning authorities and identified key stakeholders during the site selection and assessment process. Consultation activities for facilities that are not low-impact are usually undertaken by the relevant planning authority, with support provided by the carrier where appropriate.

When Vodafone advertises low-impact base station proposals, relevant contact details are clearly marked. This information ensures your enquiry will be responded to directly by the field team working on the project.

Vodafone's approach to improving services in an area involves an overall network deployment plan, a thorough assessment to identify options that are environmentally prudent, and a documented consultation plan designed to include relevant stakeholders who may be affected by an individual proposal.

Vodafone is committed to communicating proposals to the public, including reasons for any preferred option. Vodafone welcomes all submissions and examines all issues raised. Vodafone endeavours to respond promptly to any community concerns. Where we can we will make adjustments to proposals as we believe that the best outcomes are achieved when we work together and local input is considered.

Shouldn't Council be the consenting authority?

The Telecommunications Act 1997 requires telecommunications carriers to comply with state and territory laws in relation to the installation of certain types of telecommunications facilities. The legislation recognises that there are some telecommunications facilities and activities that are considered essential to building and maintaining telecommunications networks, but do not have a high visual impact. These facilities are commonly referred to as "low-impact facilities" and are described in the Telecommunications (Low-impact Facilities) Determination 1997 (the Determination). Low-impact facilities are exempt from state and territory planning laws. They are defined by their visual impact on the environment and the land use area within which the facility is to be located, although they operate in the same way as larger facilities.

In addition, the Telecommunications Code of Practice 1997 provides obligations for carriers when designing and operating facilities, such as inspecting land, installing and maintaining low-impact facilities, and compliance with industry codes and standards. Telecommunications carriers must comply with the industry code ACIF 'Code for the Deployment of Mobile Phone Network Infrastructure' (ACIF Code). This Code commonly referred to as the ACIF Code, outlines the steps carriers must take when deciding the location and design of new mobile phone base stations.

Reference can be made to the MCF

<http://www.mcf.amta.org.au/amta/site/mcf/downloads/2008/MCF%2054%20Fact%20Sheet%20Regulatory%20Final.pdf> or

http://www.mcf.amta.org.au/amta/site/mcf/downloads/2008/MCF%2050%20Fact%20Sheet%20ACIF%20Code_3.pdf for more detailed, publicly available information.

What is the process for consultation when upgrading low-impact sites?

If Vodafone were to make changes to the site (that being significant physical characteristics or other changes that would significantly impact on the radiofrequency signal levels from the facility) notification to the community and Council would be required under Section 5.6 of the ACIF 'Code for the Deployment of Mobile Phone Network Infrastructure' (ACIF Code). Notification about the proposed works would include a notice in the local paper and a letter to Council. Before commencing any modification work Vodafone would be required to have regard to any submissions from Council and the community.

How does Vodafone maximise access to consultation activities?

When undertaking community consultation we draw on the expertise of local community representatives to ensure we maximise access to consultation activities. Examples of how we do this include consideration of holiday or other festival periods, notification, signage and public notices in accordance with the requirements of the ACIF 'Code for the Deployment of Mobile Phone Network Infrastructure' (ACIF Code)

as well as the inclusion of interactive information sessions where considerable community interest is expected.

In addition to this, information concerning a proposal is publicly available on the Radio Frequency National Site Archive (RFNSA). Visit www.rfnsa.com.au for more information.

How does Vodafone work with local stakeholders to achieve the best outcomes?

In cases where considerable community interest is expected, Vodafone meets with key stakeholders such as local councils and members of parliament prior to commencing formal consultation under the ACIF 'Code for the Deployment of Mobile Phone Network Infrastructure' (ACIF Code). Consultation plans, timeframes and opportunities are discussed and implemented during the consultation process.

In some cases community sensitive sites such as schools and child care centres are consulted with in selecting locations for estimating RF (EME) exposure levels and reporting.

How does Vodafone determine coverage and timeframes petitions for ACIF notification?

As a minimum, Vodafone follows the ACIF 'Code for the Deployment of Mobile Phone Network Infrastructure' (ACIF Code) and its guidelines in determining the extent and timeframes for consultation. When undertaking consultation works for new sites, very often Vodafone goes over and above the minimum consultation requirement specified under the ACIF Code. Within reasonable means Vodafone provides extensions to consultation timeframes to allow for submissions to be made.

How does Vodafone assess the relevance of and respond to petitions during consultation?

Depending on the number of signatures, petitions are normally acknowledged and responded to the community representative who made the submission.

Vodafone will use its best endeavours to assess the representativeness of petitions submitted as part of any consultation process to ensure they are considered appropriately in decision making. Vodafone will endeavour to assess the relevance of submission in a number of ways, including but not limited to the number and content of submissions, whether or not signatories are local to the area, the relevance of the issues raised in relation to a proposal, seek feedback from community representatives and leaders and consider a petition within the context of wider community feedback.

Why does Vodafone favour community information sessions over public meetings with community members?

We believe that this form of consultation is extremely effective as it gives people to have one to one discussions in a more detailed and relaxed manner with our project staff and independent experts on health and safety.

Our Approach to Health and Safety

Vodafone staff and Partners should refer to EMEC100 – EME Positions and Messages for specific Health and Safety position statements relating to EME.

As a general approach, all first responses to queries concerning mobile networks and health should be accompanied to references from authoritative sources including WHO, ARPANSA, ACMA, EMF Explained and AMTA/MCF.

Additional responses specific to deployment related questions can include the following. These have been approved by Vodafone's EME Specialist.

What is the current advice on health research and mobile phone technology?

In relation to electromagnetic fields (EMF, alternatively referred to as RF or EME) and health the World Health Organization (WHO) says:

"Extensive research has been conducted into possible health effects of exposure to many parts of the frequency spectrum including mobile phones and base stations. All reviews conducted so far have indicated that exposures below the limits recommended in the ICNIRP (1998) EMF guidelines, covering the full frequency range from 0-300 GHz do not produce any known adverse health effect. However, there are gaps in knowledge still needing to be filled before better health risk assessments can be made." (<http://www.who.int/peh-emf/research/en/>)

This position is supported by other national and international expert review groups, examples of which can be found at http://www.vodafone.com/start/responsibility/mpmh/mobiles_health/summary_of_expert.html.

There are international guidelines on safe levels of EME exposure, including that from mobiles and base stations. Independent expert reviews have concluded that – provided mobile phones and base stations are operated within these guidelines – the absorption of energy from them poses no threat to human health. All our mobile phones and base stations comply with these guidelines and operate within safe exposure levels.

There are still some gaps in scientific knowledge and further research is needed. For example, although current evidence is reassuring, it is difficult to assess whether there may be health risks associated with using a mobile phone for 10 years or more. Vodafone acknowledges this uncertainty and is already supporting the ongoing research work recommended by the WHO, such as long term cohort studies. We review all major research into mobile phones and health, and we will update our policies and practices if experts decide there may be a risk.

Refer to the

<http://www.emftoolkit.com/?MenuID=Vodafone's%20Approach%20to%20EMF/20070/25220> for more information.

Reference can be made to EMF Explained <http://www.emfexplained.info/?ID=25140> for more detailed, publicly available information.

Do the trends in demand for access to mobile technology mean that exposure levels from base stations are rising?

In Australia, the last decade has seen continued growth in the use of mobile network services for voice calls, and now data. Given the number of mobile customers and the increasing demand for 3G services, there is a need for increased network capacity to cater for the amount of voice and data traffic on mobile networks, particularly during daily busy (peak) periods.

Continued investment in mobile networks involves the deployment of new network facilities and the ongoing upgrade of existing network facilities. For example, Vodafone may increase the level of equipment and the level of operating power of that equipment at a site, as a means to provide for greater capacity and network services that will meet growing demand. In doing so, it is likely that the cumulative levels of electromagnetic fields (EMF, alternatively referred to as RF or EME) that a network facility emits may increase.

Vodafone will ensure that any upgrade activity or new site maintains exposure levels from network facilities in compliance with the Australian safety standards. As a responsible organisation, we have adopted stringent processes to ensure that we can demonstrate full compliance with Australia's safety standards (ARPANSA, RPS3).

Independent field monitoring of exposure levels around mobile phone base stations has been conducted since 1999 under the control of government agency, ARPANSA. This monitoring provides an indication of the impact of increasing demands for mobile network services on exposure levels, in a cumulative sense. Surveys conducted from 2007 to date have found exposure levels from antennas and base stations operated by Australia's telecommunications carriers were well below the allowable limit.

Reference can be made to ARPANSA

<http://www.arpansa.gov.au/RadiationProtection/BaseStationSurvey/index.cfm> for more detailed, publicly available information.

Are children at greater risk?

The WHO has a clear position on RF and mobile phones:

- International guidelines governing RF exposure from mobile phones and their base stations are in place
- Those guidelines protect everyone in the population, including children, and incorporate large safety margins.

Specifically in relation to the international (ICNIRP) guidelines and children, the WHO advise;

"The ICNIRP guidelines were developed to limit human exposure to electromagnetic fields (EMF) under conditions of maximum absorption of the fields, which rarely occurs, and the limits incorporate large safety factors to protect workers and even larger safety factors to protect the general public, including children. Thus, the limits in the ICNIRP guidelines are highly protective and are based on all the available scientific evidence"

WHO children and mobiles clarification statement

http://www.who.int/peh-emf/meetings/ottawa_june05/en/index4.html

However, recognizing that some parents may be concerned about mobile phone usage by children, Vodafone suggests that the World Health Organization website is a good place for information on how to effectively reduce mobile phone exposure:

"In addition to using "hands-free" devices, which keep mobile phones away from the head and body during phone calls, exposure is also reduced by limiting the number and length of calls. Using the phone in areas of good reception also decreases exposure as it allows the phone to transmit at reduced power." (Fact Sheet 193, May 2010):

Refer to the <http://www.emftoolkit.com/?ID=25209>

Reference can be made to EMF Explained <http://www.emfexplained.info/?ID=25209> for more detailed, publicly available information.

Note for questions relating to EMF and cancer, headaches and other symptoms, fertility, fertility, sleep and brain function refer to <http://www.emftoolkit.com/?Page=24765> for more information and reference can be made to EMF Explained <http://www.emfexplained.info/?ID=24765> for more detailed, publicly available information.

Should we have exclusion zones from schools and other sensitive sites?

We appreciate that sometimes people are particularly concerned about base stations being placed in or near to schools and other community buildings, where children spend a lot of time.

The Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) states that the standards which protect people from electromagnetic energy (EME) exposure do not set any distances between mobile base station locations and areas which may be considered to be sensitive. ARPANSA goes on to say:

“Similarly, the ACIF Code does not specify arbitrary distances at which infrastructure must be sited from community sensitive locations, because arbitrary distances do not necessarily reflect a precautionary approach. In fact, infrastructure sited further from a community sensitive area may need to operate at a higher power and may result in higher EME exposures in that sensitive area.

Furthermore, it must be remembered that evidence gathered by ARPANSA confirms that exposure levels in public areas are typically hundreds or thousands of times less than the exposure limit set by the ACMA”. (ARPANSA Fact Sheet No. 6 “About mobile phone networks”, revised June 2008).

Exclusion zones or restricted access areas are only required where the radio frequency signal level exceeds the permitted safety limits. For a base station this usually occurs within a few metres of the antenna which is normally well above the ground or on a rooftop.

Reference can be made to the MCF <http://www.mcf.amta.org.au/files/Exclusion.Zones.pdf> and ARPANSA <http://www.arpansa.gov.au/pubs/eme/fact6.pdf> for detailed, publicly available information.

What do we really know about mobile technology and health when we consider the changing use habits, changing technology and long term effects?

Over 50 years of scientific research has already been conducted into the possible health effects from mobile phones, base stations and other wireless services.

The data from this research has been analysed by many expert review groups. Weighing the whole body of evidence, there is no evidence to convince experts that exposure below the guidelines set by the International Commission on Non-Ionizing Radiation Protection (ICNIRP) carries any health risks, for adults or children.

In relation to electromagnetic fields (EMF, alternatively referred to as RF or EME)) and health the World Health Organization (WHO) says:

“Extensive research has been conducted into possible health effects of exposure to many parts of the frequency spectrum including mobile phones and base stations. All reviews conducted so far have indicated that exposures below the limits recommended in the ICNIRP (1998) EMF guidelines, covering the full frequency range from 0-300 GHz, do not produce any known adverse health effect. However, there are gaps in knowledge still needing to be filled before better health risk assessments can be made.” WHO research summary <http://www.who.int/peh-emf/research/en/>.

Refer to the <http://www.emftoolkit.com/?ID=24489> for more information.

Reference can be made to EMF Explained <http://www.emfexplained.info/?ID=24489> for more detailed, publicly available information.

What assurances/guarantees can Vodafone provide against future impacts of EME?

Vodafone acknowledges that some people are concerned about potential future health effects of mobile phone technology and hence some raise questions about liability. Governments and health authorities do insist on very high standards of safety and continuous open review of all new research.

As a responsible organisation, we have adopted stringent processes to ensure that we can demonstrate full compliance with Australia's safety standards (ARPANSA, RPS3).

How does Vodafone consider and assess new research on EME?

Our advice on health and mobile technology comes from the conclusions reached by panels of expert scientific review groups conducted within the framework of or appointed by national or international health authorities such as the World Health Organization (WHO). This advice is drawn from reviews and evaluation of published research into radio frequency fields (i.e. radio waves).

Vodafone is committed to supporting independent research into the use of mobile phones. We contribute to the \$4.5 million Australian Government's electromagnetic energy research program every five years. Vodafone (VHA) and its parent companies, Vodafone and Hutchison also contribute to the international research effort. For example, the \$28.5 million German and \$11.8 million UK national government mobiles and health research programs have been funded in partnership with the industry on a 50:50 basis.

Vodafone looks to the WHO to identify and define health research needs. Many large research funding agencies use the WHO Research Agendas as a basis for their funding research in electromagnetic fields: *"Since 1997 over \$200million of funding for research has been conducted to complete these Agendas."* (World Health Organization - <http://www.who.int/peh-emf/research/agenda/en/index.html>)

Vodafone is pleased to contribute funding towards this important body of independent research. We are also proud of the fact that all findings are published independently, guaranteeing complete transparency to ensure complete peace of mind for all mobile phone users.

Shouldn't we be concerned about the conclusions of the INTERPHONE study?

Most experts agree that the RF energy produced by a mobile device is not sufficient to cause long-term changes in the body.

In May 2010, the International Agency for Research on Cancer ([IARC](#)) published the first combined findings from all study centres of the Interphone study, a major piece of [research into the possible health effects of mobile phones](#).

Despite no overall link to brain cancer, the INTERPHONE researchers say uncertainty remains about possible effects of long term heavy use.

The international organization responsible for setting the RF safety guidelines (ICNIRP) advised that as a result of INTERPHONE, there should be no change to the present RF safety guidelines and *the study provides no clear, or even strongly suggestive, evidence of a hazard⁵.*

⁵ UK Health Protection Agency website

The findings of the INTERPHONE study will be used by the International Agency for Research on Cancer (IARC) and the WHO towards assessing the level of the potential health impact of exposure to RF fields.

Refer to *Interphone Q&A for Deployment Teams*
<http://www.emftoolkit.com/factsheets.asp>

Refer to the *EMF and Cancer – The Interphone study*:
<http://www.emftoolkit.com/?ID=24624> and *Interphone – What do the health experts say*
: <http://www.emftoolkit.com/?ID=25661> for more information.

Reference can be made to *EMF Explained EMF and Cancer – The Interphone study*:
<http://www.emfexplained.info/?ID=24624> and *Interphone -What do the health experts say* <http://www.emfexplained.info/?ID=24624> for more detailed, publicly available information.

Shouldn't we be concerned about the conclusions of the BioInitiative Report?

The report titled *BioInitiative: A Rationale for a Biologically-Based Public Exposure Standard for Electromagnetic Fields* was published on the internet in 2007 and claimed existing public safety standards governing the level of radiation emitted by mobile phones, power lines, Wi-Fi networks and other electrical devices were inadequate. Web link: <http://www.BioInitiative.org/report/docs/report.pdf>.

The report was compiled by a group of self-appointed working group consisting of 14 “scientists, public health and public policy experts” from the US, Sweden, Britain, China and Denmark. The report argued health effects at biological levels are widely reported below the levels of existing safety limits and new safety standards should be developed taking into account these ‘bioeffects’ as a precautionary measure.

The scientific assessment of the “BioInitiative Report” is inconsistent with current World Health Organization (WHO) position and the significant number of worldwide expert reviews which have been conducted under the auspices of national health agencies. A number of expert scientific groups from the European Commission (SCENIHR), the Netherlands (HCN) and Australia (ACRBR) have reviewed the report. Here are some examples of their conclusions:

“Recently, there have been several articles and broadcasts in the general press and media referring to new scientific evidence on possible effects on human health of exposure to EMF notably from mobile phone technology. Some of these, in particular the BioInitiative Report state that new evidence proves the carcinogenic nature of exposure to EMF. The BioInitiative Report is one of several reports and statements by scientists diverging from the scientific position taken by other research groups, including that of the SCENIHR.” (Scientific Committee on Emerging and Newly Identified Health Risks (SCENIHR), January 2009 p 12, http://ec.europa.eu/health/ph_risk/committees/04_scenihhr/scenihhr_opinions_en.htm#4).

“Overall we think that the BioInitiative Report does not progress science, and would agree with the Health Council of the Netherlands that the BioInitiative Report is “not an objective and balanced reflection of the current state of scientific knowledge”. As it stands it merely provides a set of views that are not consistent with the consensus of science, and it does not provide an analysis that is rigorous enough to raise doubts about the scientific consensus”. (Australian Centre for Bioeffects Research (ACRBR), December 2008, ACRBR Perspective on the BioInitiative Report, <http://www.acrbr.org/>).

Vodafone ensures that mobile phones and their base stations are designed and operated so that people are not exposed above radio frequency exposure guidelines set by international and national bodies such as International Commission on Non-Ionizing Radiation Protection (ICNIRP). The guidelines are there to protect all members of the public 24 hours a day.

Refer to the <http://www.emftoolkit.com/?ID=25255> or <http://www.emftoolkit.com/?ID=25336> for more information.

Reference can be made to [EMF Explained to http://www.emfexplained.info/?ID=25457](http://www.emfexplained.info/?ID=25457) for more detailed, publicly available information.

What is Vodafone's advice to customers on the basis of the conclusions of the BioInitiative Report?

Our advice on health and mobile technology comes from the conclusions reached by panels of expert scientific review groups conducted within the framework of or appointed by national or international health authorities such as the World Health Organization (WHO).

The current WHO position on electromagnetic fields (EMF, alternatively referred to as RF or EME)) and health is

"Extensive research has been conducted into possible health effects of exposure to many parts of the frequency spectrum. All reviews conducted so far have indicated that exposures below the limits recommended in the ICNIRP (1998) EMF guidelines, covering the full frequency range from 0-300 GHz, do not produce any known adverse health effect. However, there are gaps in knowledge still needing to be filled before better health risk assessments can be made." <http://www.who.int/peh-emf/research/en/> [accessed 5 September 2010]

The current International Commission on Non-Ionizing Radiation Protection (ICNIRP) exposure limits, as recommended by the WHO, already include a significant safety margin.

Refer to the <http://www.emftoolkit.com/?ID=25255> for more information.

What if the current standards are not adequate?

Standards are part of everyday life in today's society but many people don't even realise they exist.

The homes we live in, the cars we drive and appliances we use are all built to standards so they work correctly and are safe to use.

Decades of research into electromagnetic fields (EMF, alternatively referred to as RF or EME)) and health has produced a large body of scientific literature which national and international standards organisations can review to establish safe exposure limits.

The World Health Organization (WHO) has formally recognised the International Commission on Non-Ionising Radiation Protection (ICNIRP) to develop the international EMF exposure guidelines.

The WHO advises, *"the international EMF safety guidelines from ICNIRP were developed following reviews of all the peer-reviewed scientific literature, including thermal and non-thermal effects. The standards are based on evaluations of biological*

effects that have been established to have health consequences.” See WHO Web site <http://www.who.int/peh-emf/standards/en/>.

The [ICNIRP guidelines](#) were published in 1998. They form the basis of WHO and International Telecommunications Union (ITU) recommendations to governments and have been widely adopted around the world.

In 2009 and 2010, ICNIRP reaffirmed the EMF safety guidelines following a review of national and international EMF research and published scientific literature including the INTERPHONE study on mobile phone use and brain cancer risk. See ICNIRP note: <http://www.icnirp.org/documents/ICNIRPnote.pdf>

The EMF exposure guidelines are based on careful analysis of the scientific literature and are designed to offer protection for all ages including children against identified health effects of EMF with a large inbuilt safety margin.

The majority of national standards including Australia’s ARPANSA Standard, RPS3, are based on the well established International ICNIRP guidelines. Some standards have small differences in the derived exposure levels; however, the basic exposure restrictions are similar to the ICNIRP values.

The WHO warns against adopting additional arbitrary reductions on the ICNIRP levels as such measures are not based in science and may undermine public confidence.

In Australia, all mobile phone base stations are required to comply with strict regulations on public exposure limits. These limits are set out in the Radiocommunications (Electromagnetic Radiation – Human Exposure) Standard 2003 and are administered by the Australian Communications and Media Authority (ACMA) under the Radiocommunications Act 1992. The Standard is based on the public and occupational limits that have been set by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA), an agency of the Federal Government. The Standard is often referred to as the “ARPANSA Standard” or the “Radiation Protection Standard”.

Refer to the <http://www.emftoolkit.com/?ID=24898> for more information.

Reference can be made to EMF Explained to <http://www.emfexplained.info/?ID=24898>, the MCF <http://www.mcf.amta.org.au/files/MCF.54.Fact.Sheet.Regulatory.Final.pdf> or ARPANSA <http://www.arpansa.gov.au/publications/codes/rps3.cfm> for more detailed, publicly available information.

How does RF from a mobile base station and handset compare with other sources of RF in our homes and outdoor environments?

In 2008, the Australian Centre for Bioeffects Research (ACRBR) undertook a survey of electromagnetic fields (EMF, alternatively referred to as RF or EME) in the home in response to public concern Public concern regarding the EMF levels from devices such as mobile phones and base stations, personal wireless devices, Wi-Fi and wireless LAN and perceptions that such exposures may add up to reach levels that might exceed compliance levels.

A series of measurements were taken in homes around the Melbourne area to determine what EMF devices (number and type) are ‘typical’ in Australian homes and were compared to compliance levels for EMF exposure.

The survey found that all exposures measured were less than compliance limit with cumulative exposure at reference points hundreds or thousands of times below

compliance limit. The survey also concluded that individual exposure was dominated by the microwave oven, cordless phone, and wireless router with a large variation in exposure across homes and across devices.

For base stations, ARPANSA regularly carries out RF exposure measurements. See <http://www.arpansa.gov.au/RadiationProtection/BaseStationSurvey/index.cfm>. ARPANSA's results confirm the World Health Organization's conclusions concerning the low levels of RF exposure in public areas near mobile phone base stations:

"Recent surveys have shown that the RF exposures from base stations range from 0.002% to 2% of the levels of international exposure guidelines, depending on a variety of factors such as the proximity to the antenna and the surrounding environment. See <http://www.who.int/mediacentre/factsheets/fs304/en/index.html>

Refer to the *EMF Toolkit –Radiocommunications in the community* <http://www.emftoolkit.com/?ID=25186> for more information.

Reference can be made to *EMF Explained -Radicomunications in the community* <http://www.emftoolkit.com/?ID=25186>

or ACRBR for results of measurements <http://www.acrbr.org.au/SW2008/posters/SW2008%20ACRBR%20poster%20A4.pdf?submit=Download+Poster>

How strong are the environmental or background EME levels in the community?

In a typical community, broadcast television and radio signals are similar in strength to signals from mobile phone networks and other two-way communications systems. These signals are overall very low and well below the established safety guidelines.

The World Health Organization (WHO) has reviewed the background electromagnetic fields (EMF, alternatively referred to as RF or EME)) levels from wireless systems and says, *"Recent surveys have shown that the RF exposures from base stations range from 0.002% to 2% of the levels of international exposure guidelines, depending on a variety of factors such as the proximity to the antenna and the surrounding environment. This is lower or comparable to RF exposures from radio or television broadcast transmitters"*. See <http://www.who.int/mediacentre/factsheets/fs304/en/index.html>

Specifically on EMF levels in public areas the WHO says, "Recent surveys have indicated that RF exposures from base stations and wireless technologies in publicly accessible areas (including schools and hospitals) are normally thousands of times below international standards."

Refer to the <http://www.emftoolkit.com/?ID=25186> for more information.

Reference can be made to *EMF Explained* <http://www.emfexplained.info/?ID=25186> for more detailed, publicly available information.

Is Vodafone trying to address public concerns relating to EME and health?

At Vodafone, the health and safety of all is given top priority. We are committed to ensuring the safety of our technology. We recognise and understand that some people are concerned about the potential health effects of mobile phone technology – be it phones or base stations. We are firmly committed to addressing those who are concerned in an open and transparent way.

To do this we:

- Ensure that mobile phones and our base stations are designed and operated so that people are not exposed above international and national guideline levels.
- Contribute to independent research on our technology.
- Engage with local communities in an open and transparent way when our building base stations.
- Refer those who are concerned to respected health advisory bodies such as the World Health Organization (WHO) and providing links to major expert reviews on our global website www.vodafone.com.
- Work to lead the industry in responding to public concerns leading initiatives that promote easy access and understanding of factual information on health, safety and compliance for mobiles.
- Actively engage with governments, doctors, councils, media and our own staff on the topic in an open and transparent way.

Refer to the <http://www.emftoolkit.com/?ID=25632> for more information

Reference can be made to Vodafone (Group website) http://www.vodafone.com/start/responsibility/mpmh/our_goals_and_commitments.html for more detailed, publicly available information.

Where does Vodafone get its advice on health from?

Our advice on health and mobile technology comes from the conclusions reached by panels of expert scientific review groups conducted within the framework of or appointed by national or international health authorities such as the World Health Organization (WHO). This advice is drawn from reviews and evaluation of published research into radio frequency fields (i.e. radio waves).

Refer to the *EMF Toolkit Health Effects Science*: <http://www.emftoolkit.com/?ID=25633> for more information.

Reference can be made to Vodafone http://www.vodafone.com/start/responsibility/mpmh/mobiles_health/summary_of_expert.html for more detailed, publicly available information.

How does Vodafone minimise EME exposure from mobile base stations?

At Vodafone we ensure that mobile phones and our base stations are designed and operated so that people are not exposed above international guideline levels (International Commission on Non-Ionising Radiation Protection (ICNIRP)] and national standards (Australian Radiation Protection and Nuclear Safety Authority (ARPANSA)).

The international guidelines are based on more than five decades of bio-effects research and are there to protect all people 24 hours a day.

Australia's radiofrequency (RF) exposure limits, the ARPANSA Standard 2003, are derived from the guidelines of the ICNIRP, the independent scientific body that advises the World Health Organization (WHO). The ARPANSA Standard is one of the most comprehensive and up-to-date RF exposure standards in the world, and is based on thorough scientific research into RF signals and exposure.

The Australian Communications and Media Authority (ACMA) has set mandatory limits based on the ARPANSA Standard. Vodafone ensures that all Vodafone base stations comply with these standards and compliance with these mandatory limits is enforced through random audits by the ACMA.

Telecommunications base stations operate at low power and emit low levels of radiofrequency fields. Independent field monitoring of exposure levels around mobile phone base stations has been conducted since 1999 under the control of government agency, ARPANSA. Surveys conducted from 2007 to date have found exposure levels from antennas and base stations operated by Australia's telecommunications carriers were well below the allowable limit.

Reference can be made to ARPANSA

<http://www.arpansa.gov.au/RadiationProtection/BaseStationSurvey/index.cfm> for more detailed, publicly available information.

How can I shield my property from RF exposure from the proposed facility?

Vodafone base stations are designed and operated so that people are not exposed to electromagnetic energy above the safe exposure levels set by the Australian Standard - the ARPANSA Standard RPS3.

Testing demonstrates that mobile telecommunications facilities often operate well below the limits set by this standard. Vodafone maintains that we do not recommend or promote the need for additional RF (alternately called EME) shielding for nearby dwellings from these facilities.

If you are seeking further information on how to further shield a house (interior) from RF waves, you may wish to investigate solutions which are commercially available including those most effective at blocking radio waves such as aluminium, steel or brass provided they are properly grounded. For example, metal screens for windows, tin roofs, sisalation in walls and ceiling and metalised solar guard.

A less obtrusive method for windows which you may consider is window tint. However, decreased RF signals using these solutions, will also affect TV and AM and FM radio effectiveness. Also, mobile phone calls from within the home will not work well, if at all. Any successful mobile call made within the shielded area will have meant that the phone itself will have to power up due to the poor indoor coverage thereby increasing the personal RF exposure from the mobile phone itself.

Will Vodafone commit to pre and post commissioning testing for RF (EME)?

When appropriate, Vodafone will commit to pre and post testing of RF fields (EME) in the environment to confirm that a site is operating within safety levels as specified by Australia ARPANSA Standard (RPS3).

With any proposal, Vodafone will continue to provide useful and relevant information to those members of the public who may have concerns. These include making all relevant information accessible on Vodafone's websites www.vodafone.com.au/healthandmobile, as well as in our stores, and via call centres. We are also committed to supporting and funding independent research which investigates any potential effect of radio technology on human health.

Where can I get more information?

Vodafone Australia Web Site www.vodafone.com.au

EMF Explained www.emfexplained.info

Mobile Carriers Forum www.mcf.amta.org.au

Radio Frequency National Site Archive www.rfnsa.com.au

Note: Vodafone internal resource: Vodafone EMF Toolkit www.emftoolkit.com requires VHA staff and its Partners to register.

10.2 Appendix 2 Template: Community Relations and Engagement Plan

1. **Project Name:**
2. **Project Description:**
3. **Objective of engagement:**
4. **Stakeholder Identification and Analysis:**

	Risk Assessment		Response		
	Are they likely to be concerned? If so, what about?	Are there possible grounds/likelihood for objection?	How to/ Opportunities to engage	When to engage	Who should engage
General Community					
Landlord/Tenant					
Media					
Elected Representatives e.g. MPs, Councilors					
Community Group					
Regulators e.g. ACMA/TIO					

Note: Complete all fields above which are relevant to your project.

5. Demonstrate compliance with Section 5 of the Community Engagement Procedure for VHA by confirming that:

- (5.1) The completed community relations and engagement plan for your project has been submitted for approval by VHA
- (5.2) You have communicated and documented escalation procedures to project team, field staff and/or sub contractors
- (5.3) Your project team have received relevant risk communication training and your project team are aware of VHA approved Responsible Network Deployment Positions and Messages
- (5.5) For existing sites, a desktop review of the “Sensitive Site List” will be undertaken and documented and acted upon accordingly. For new sites, the desktop review will also include other carrier sensitive sites (within Google Maps), MCF combined carrier search rings, AMTA media clips, online directories, council websites and aerial maps all of which will be documented accordingly and supplemented by risk assessment activities during site visits.
- (5.5) All regulatory compliance obligations for engagement have been reviewed and are understood.

Note: Please provide evidence where available.

10.3 Appendix 3: Sensitive Site Checklist for Red Rated Sites

Introduction

This checklist notes additional measures to be considered when deploying sites in sensitive areas. Although this checklist is aimed at deployment sites that follow the ACIF C564:2004 process, it can be applied where deemed necessary to sensitive sites that follow the Development Application process. The measures in this checklist have been designed to compliment the ACIF C564:2004 process and should not be used as an alternative to the standard ACIF consultation process.

Checklist

Pre-consultation

- Prior to commencing the formal ACIF consultation, pre-consult with key stakeholders such as Council, relevant ward councillors, members of parliament, and other local stakeholder groups such as nearby schools, P&C, child care centres and action groups. A briefing note provides a good foundation to start the engagement process. Offer to meet and discuss the proposal and follow up by sending a copy of the briefing note if the invitation to meet is refused or ignored.
- These pre-consultation meetings provide an opportunity to gather further feedback on the proposed community consultation plan.
- See example of briefing note in the following pages.

Proactively inform the media and regulators

- Where possible, carefully time the proactive delivery of updates to key influential stakeholder like local journalists and the regulator. This will be undertaken by the Vodafone Community Relations Manager.

Review of standard notification letter

- Review the standard notification letter to ensure simple and clear messaging that explains the need for the proposed facility, the site selection approach and the process for decision making.
- See example of a revised letter in the following pages.

Additional time frames

- Provide additional time frames during the consultation process over and above the standard ACIF requirements.

When to start the formal consultation process?

- Do not consult during holiday periods – school and public holidays.

Advertorial

- In addition to the standard public notice, consider the benefits of a full page advertorial in the front section of the local paper. This publication can be timed to coincide with the standard public notice and the letter-drop.
- See example of an advertorial in the following pages. Note the clarity of process milestones and the decision making process.
- Any advertorial artwork must be provided and formally approved by the VHA Community Relations Manager for publication.

Information session

- Undertake drop-in session at a neutral and accessible local venue.
- Book the venue for a minimum of ten hours to avoid clashing with objectors who may attempt to book the same venue.
- Provide a minimum of three hours for the session. Ideally, 4.30-7.30PM works well.
- Advertise the session widely and remind all key stakeholders closer to the date. Ensure the session doesn't clash with any local events or meetings (e.g. P&C meetings).
- Prepare information boards on all key areas of the proposal including the need for the facility, the site selection process, the design, the decision making process, EME and health etc.
- Engage an EME specialist to attend a community information session or other stakeholder meeting where EME is likely to be the dominant issue of concern. Quotes for EME specialist involvement at an information session must be approved by VHA prior to any site specific activity being undertaken. All requests should be escalated to the Community Relations Manager.

Undertake EME Testing or Independent Review of Predictions

- As a last resort to address EME concerns, VHA may offer to undertake pre and post commissioning testing. Before this is offered, evidence of testing undertaken at other sites and reference to the ARPANSA annual audits should be provided to concerned stakeholders. Only as a last resort should site specific testing be offered and any quotes for EME specialist involvement for testing or review must be approved by VHA prior to any site specific activity being undertaken. No commitments should be made to stakeholders without VHA approval. All requests should be escalated to the Community Relations Manager.
- ARPANSA may be able to provide an independent review of EME prediction reports. Requests should be made via VHA's Community Relations Manager / EME Specialist.

Consider feedback – site selection

- Request a review of any additional sites that are provided by the local community, ensuring there is community consensus on their appropriateness.
- Ensure the reporting back of these is provided in a simple and clear format.
- When undertaking additional assessment activities be very clear with stakeholders on the decision making process to ensure expectations on the outcome are managed. For example, if investigating alternative options be very clear that Vodafone will make the decision based on our own assessment of these and will not share the decision making with community members.

Final decision

- Advise in writing all who made submissions of Vodafone's final decision on the proposal and address wherever possible how their input has influenced the decision.

24 March 2010

Dear Resident / Tenant,

IMPORTANT INFORMATION

Community consultation for a proposal to install a Telecommunications (Mobile Telephone) Facility at North Epping Oval, Boundary Road, North Epping NSW 2121

Introduction and background

Since 2004 Vodafone and Optus (carriers) have been seeking to locate a suitable site to install a mobile telecommunications facility to improve its 3G (Third Generation) mobile network coverage in and around the North Epping area. Following consideration of a number of alternative sites, North Epping Oval has been selected as a suitable site for this installation.

Through a joint venture agreement, Vodafone and Optus propose to share this single base station facility to meet both their coverage needs.

This consultation letter is to consult with you, as a community member or representative of a relevant community group or organisation. The decision by Vodafone and Optus to develop a proposal for this site has not been made lightly. We have been consulting with Hornsby Shire Council and other key community stakeholders prior to consulting with community members such as yourself in relation to this proposal.

Total Communications Infrastructure Pty Limited (TCI), as Vodafone's network deployment partner, will act on behalf of the carriers as the point of contact with respect to the consultation process for this proposal.

Objectives of the proposal

The objective of the proposal is for Vodafone and Optus to improve its 3G mobile network coverage in and around the North Epping area, thereby providing enhanced mobile network services to users in the area.

Improved coverage by this proposal would enhance mobile phones and wireless devices such as laptop computers using 3G to send and receive data much faster, enabling many more features and applications to be possible. Compared to 2G, 3G can handle voice calls and provides higher data communication rates and more advanced multimedia services, such as video telephony and mobile broadband.

The proposal

The proposal is to install three panel antennas mounted on the flood light pole nearest to the club house at North Epping Oval, one radiocommunications dish mounted on the external wall of the club house (facing the car park),

Sydney
Melbourne
Brisbane
Perth

along with three supporting equipment units and one battery unit near the tennis courts. All connecting power and cables would be located underground. A detailed description of the proposed installation is given further below in this letter. A photomontage showing the proposed antenna installation is also attached to this letter.

Alternative sites

Since 2004, four alternative sites/options have been considered by Vodafone and Optus in the North Epping area. This included options such as a new light pole at Woods Street Reserve with antennas installed on the new pole, installation of antennas on a HV tower north-east of Woods Street Reserve within the Lane Cove National Park and a rooftop installation at the North Epping Shopping Village. However, due to the very low power nature of 3G base stations, and physical obstructions by trees and buildings and the landform itself, only locations at a suitable height which are close to the coverage objective area are suitable. This is why the alternate options listed above were not found to be suitable.

In this instance, there were no suitable options at which Vodafone and Optus could co-locate with existing telecommunications facilities or other public utility assets. The nearest existing telecommunications facilities are located at the M2 Beecroft tunnel site, the Cheltenham Recreation Club, 213 Kissing Point Road at South Turramurra and certain other sites along the M2 motorway. Vodafone and Optus currently operate its 3G network from all of the above-mentioned sites except from the Cheltenham Recreation Club site. However, given the geographic locations, the topography and the limited geographic coverage provided by these base stations, coverage from these existing facilities do not reach the objective coverage area in and around North Epping.

This proposal removes the need for a new purpose built structure in the area, such as a telecommunications tower, pole or mast as it utilises an existing flood light pole for antenna installation. Vodafone and Optus believe this proposal strikes a good balance between improving mobile network services in the area whilst having regard to the built and natural environment of the area.

The precautionary approach

Site selection and design requires the assessment of a number of issues and competing interests in order to identify the most socially and environmentally friendly solution. Where possible, carriers will co-locate on or use existing structures and will incorporate best practice design to minimise the social and environmental impacts of mobile network facilities.

In order to provide good coverage, a mobile network facility needs to be as close as possible to where people are making calls. Optimal network design is key to ensuring that the network is precautionary in terms of design. That is, in general, the better the quality of the link (service level), the lower the RF field strength from the handset and the base station, thereby helping to minimise public exposure to electromagnetic energy¹ (EME or EMR).

¹ Mobile phones and their base station antennas produce radio waves. When used in the context of mobile phone technology, the terms RF (radio frequency), EME (electromagnetic energy), EMF (electromagnetic fields) and EMR (electromagnetic radiation) are used interchangeably but all mean radio waves.

Community information session

The carriers would like to invite you to a community information session on **Tuesday 20th April 2010, from 4.30 pm to 7.30 pm at the North Epping Bowling Club, 132 Boundary Road, North Epping**. The format for this event is a drop-in session designed to allow members of the community to obtain further information on the proposal and raise any specific questions they may have with the relevant experts that will be present on the day.

The ACIF Code consultation process

In response to calls for greater council and community involvement and more information when telecommunications facilities are installed, an *Industry Code for the Deployment of Mobile Phone Network Infrastructure* has been introduced.

One of the requirements of the Code is to notify immediate residential neighbours who may be interested and affected by the proposal.

The Code does not change the existing regulatory regime for telecommunications at local, State or Federal level. However, it supplements the carriers' existing obligations, particularly in relation to community consultation and the consideration of exposure to radio signals, sometimes known as electromagnetic energy (EME or EMR)¹.

As defined in the Code, "**Consultation** means a process whereby Carriers seek to inform other parties about a proposed project at particular premises with the intention of giving those parties an opportunity to respond to the proposal and to have their responses considered." (P.7 ACIF C564:2004).

"**Interested and Affected Parties** includes persons who reside within the immediate vicinity of the facility and may have an interest in the proposed facility." (P8 ACIF C564:2004).

As specified in the Code (P.15-16), the objectives of the consultation include:

- i. *identifying and informing Interested and Affected Parties of the proposed project;*
- ii. *providing adequate time for Interested and Affected Parties to consider and engage in meaningful dialogue on the project;*
- iii. *maximising the level of accurate and accessible information about the project to Interested and Affected Parties;*
- iv. *identifying and attempting to resolve potential issues early in the site planning process; and*
- v. *obtaining mutually acceptable outcomes on individual projects.*

The Code (P. 16) also states that "*a consultation program may not always:*

- i. *satisfy all participants; or*
- ii. *resolve all differences of opinion or values.*

The ACIF Code consultation framework enhances meaningful dialogue with councils and local communities so that better decisions about siting mobile telecommunications infrastructure are made.

One of the requirements of the Code is to notify people who may be interested and affected by the proposal. The Code also specifies certain information that must be made available to you by Vodafone and Optus.

The Code requires Vodafone and Optus to consult about the proposed development. For your information, we have also consulted with Council.

Details about the proposed installation are as follows:

Description of the proposed installation	<p>The proposed facility consists of installing:</p> <ul style="list-style-type: none"> • Three panel antennas mounted on the existing flood light pole nearest to the club house at 20m; • One radiocommunications dish mounted on the external wall of the club house (facing the car park). It is proposed to colour match the radiocommunications dish to that of the building; • Three equipment units and one battery unit near the north-west corner of the tennis courts; and • Associated works such as installation of antenna mounts, draw pits, underground conduits, feeder cables, underground power, distribution board, meter box, etc. <p>(please see attached photomontage for an illustration of the proposed antennas).</p>	
Phone contact for development and construction issues	<p>Gerald Perera Phone:02-9478 9928 / Fax:02-9478 9900 Address for written correspondence: Total Communications Infrastructure Pty Ltd (TCI), PO Box 125, St Leonards, NSW 1590</p>	
Phone contact for references to EMR information	<p>Gerald Perera Phone:02-9478 9928 / Fax:02-9478 9900 Address for written correspondence: Total Communications Infrastructure Pty Ltd (TCI), PO Box 125, St Leonards, NSW 1590</p>	
Proposed Installation Classification	<p>Vodafone regards the proposed installation as a Low-impact Facility under the <i>Telecommunications (Low-impact Facilities) Determination 1997</i> ("The Determination").</p> <p>The reasons for this conclusion are based on the classification of the following components of the facility in relation to the Determination:</p>	
	Facility	Complies with item in Determination.
	<p>Antenna – Three panel antennas - 1302mm (height) x 162mm (width) x 76mm (depth)</p>	<p>Schedule Part 1 – Radio facilities Item 2</p>

	Radio Communications Dish – One radiocommunications dish (600mm diameter)	Schedule Part 1 – Radio facilities Item 5
	Equipment Shelter – Three equipment units (each 700mm X 700mm X 1900mm (height)); and One battery unit (740mm X 740mm X 1940mm (height)).	Schedule Part 3 - Above Ground Housing Item 5
	No development approval is required in respect of this installation.	

In accordance with the requirements of the Code, any comments you may have in relation to this proposal should be received by Vodafone and Optus no later than **30 April 2010**.

Vodafone and Optus will take your comments into consideration before making a decision on whether to proceed with the proposal in its current form.

A further requirement of the Code is for Vodafone and Optus to provide Council with a Consultation Report about the responses received from those notified and the results of any other consultation conducted under its plan.

The Code requires Vodafone and Optus to include in the report:

- (a) A summary of comments received during the consultation process.
- (b) Vodafone and Optus' consideration of these comments.
- (c) A statement about Vodafone and Optus' intended actions regarding the proposed work.

When the consultation is complete, you are welcome to receive a copy of this report. You may access this report through *Hornsby Shire Council* or you may indicate that you wish to receive a copy of this report in your submission. In the latter instance, we would require an email or postal address to be included.

Further Information

Further information on a range of issues relevant to the placement of mobile phone towers (including industry codes of practice and legislation) is available at <http://emr.acma.gov.au> or by phoning (02) 6219 5555 and asking for the EME & Telecommunications Infrastructure Section. This web portal takes you directly to the Australian Communications and Media Authority (ACMA) website. The Australian Communications and Media Authority is a government regulator of telecommunications and radiocommunications. There is a vast amount of additional

information in the public domain on EME, base stations and health. Care should be taken to check the validity of information to ensure it is from a recognised credible and authoritative source.

If you would like any further information, please contact Gerald Perera at Total Communications Infrastructure Pty Ltd (TCI), PO Box 125, St Leonards, NSW 1590; Phone: 02-9478 9928 / Fax: 02-9478 9900. Comments can also be submitted through the web site at <http://community.tcipl.com.au/>

Yours sincerely,



Gerald Perera

Environmental Planner

Attachments:

- *Photomontage of the proposed facility.*
- *Report showing the estimated EME exposure levels from the proposed facility and compliance with the ACMA mandated EME exposure limits.*
- *Fact sheet on 'Electromagnetic Energy and 3G Mobile Phones' produced by the Australian Communications and Media Authority (ACMA).*

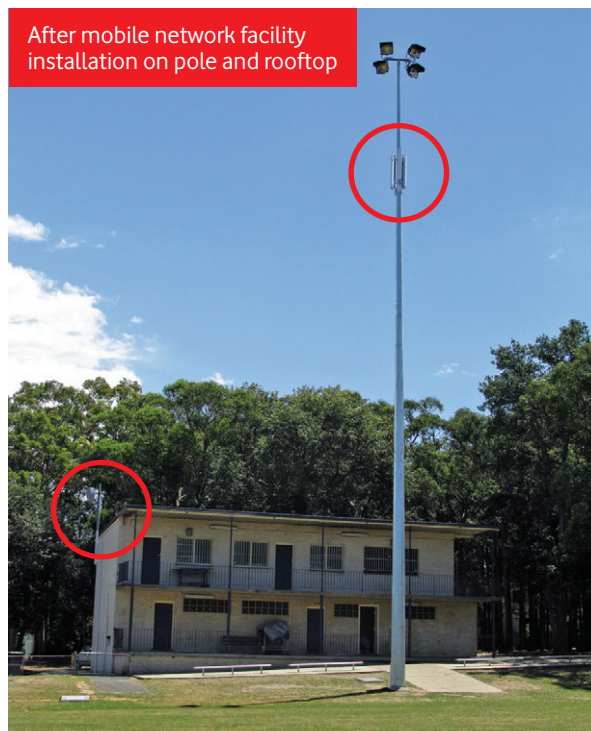
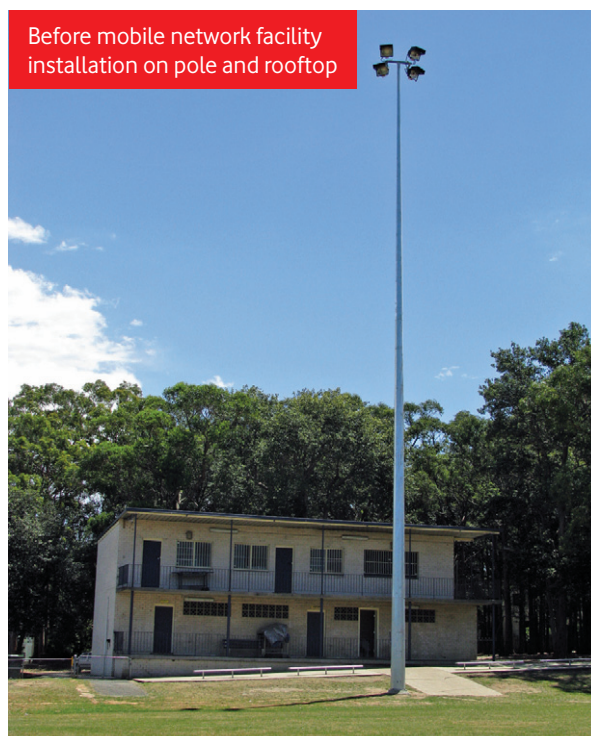
Improving Vodafone and Optus mobile phone coverage in the North Epping area

Since 2004 Vodafone and Optus have been looking for a suitable site to establish a new mobile network facility and provide improved 3G (Third Generation) network coverage in the North Epping area.

We recognise the importance of balancing the need for reliable, high quality mobile network services with having regard to the built and natural environment of the area. Since 2004 a number of different sites have been investigated, and we now believe the most suitable option has been found and invite you to let us know your thoughts.

What does our proposal involve?

Our proposal incorporates a joint design for Vodafone and Optus and includes the installation of antennas and associated equipment. Specifically, three panel antennas would be mounted on a flood light pole at North Epping Oval, Boundary Road, North Epping (the flood light pole nearest to the club house). One radio communications dish would be mounted on the external wall of the club house (facing the car park), and three supporting equipment units and one battery unit will be located on the ground near the tennis courts. All connecting power and cables would be located underground.



Why this location?

For good quality coverage, a mobile network facility needs to be as close as possible to where people are making calls or using mobile broadband devices such as wireless internet. We understand that people might prefer our infrastructure to be unobtrusive and located further away from where they live or work. However, due to the very low power of 3G facilities, and physical obstructions by trees and buildings, only locations at adequate height which are close to the coverage objective are suitable. For example, a location further north on a high voltage power line tower in the Lane Cove National Park is not suitable for improving coverage to the area immediately surrounding North Epping Oval.

Options for co-locating on existing mobile network facilities in the area have also been considered. In and around North Epping, existing mobile network facilities are located in places like the M2 Beecroft tunnel site, the Cheltenham Recreation Club and certain other sites along the M2 motorway. Unfortunately, these sites were also not suitable for providing coverage to the area immediately surrounding North Epping Oval.

Vodafone very carefully considers new sites in residential areas which may be close to community sensitive locations. Inevitably, some new sites do need to be located in residential areas to provide a reliable and effective service that allows the use of mobile phones and devices in places where people need them.

Benefits of this proposal

The proposed facility will provide North Epping residents and businesses with enhanced performance of mobile phone and mobile broadband devices enabling clearer, faster and more reliable services with access to many more mobile applications such as mobile internet.

Positively, this proposal also removes the need for a new structure, such as a pole or tower, to provide improved Vodafone and Optus coverage to the local area, therefore minimising visual and environmental impact.

Mobile technology and health

Optimum placement of mobile network facilities means a more energy efficient network and lower levels of exposure from radio frequency (RF) otherwise known as radio waves/signals, electromagnetic fields (EMF), electromagnetic energy (EME) or electromagnetic radiation (EMR).

Radio signals are something we have been living with for decades. Mobile network facilities emit low levels of radio frequency energy. Other sources within our communities include TV signals, AM and FM radio signals and radio services such as those used by emergency services. Similar technology is also used by some household items such as cordless phones, some internet routers, monitors and alarms, door bells, and interactive games that use wireless technology.

All operators of radio transmitters are regulated through a common standard. Both international guidelines and Australian standards for radio signal transmitters operate by placing a limit on the strength of the signal that can be emitted. We must demonstrate that our network facilities comply with these standards when proposing new infrastructure.

We recognise and understand that some people are genuinely concerned about the potential health effects of mobile technology and we are committed to addressing these concerns in an open and transparent way.

The World Health Organisation (WHO) conclusion on EMF and public health is that: *"considering the very low exposure levels and research results collected to date, there is no convincing scientific evidence that the weak RF signals from base stations and mobile broadband networks cause adverse health effects"*.

For further information on mobile technology and health visit EMF Explained www.emfexplained.info

Meeting town planning requirements

Our proposal is defined as a low-impact telecommunications facility according to the Telecommunications (Low-impact Facilities) Determination 1997.

Low-impact facilities are installed using provisions under the Telecommunications Act 1997 (Cth) and are exempt from State and Territory planning laws. This means that a development application is not required. However, we ensure our site design and community consultation processes are developed in accordance with the Australian Communications Industry Forum ACIF 'Code for the Deployment of Mobile Phone Network Infrastructure' (ACIF C564:2005).

Learn more about this proposal and have your say

Take the time to have your say on the North Epping Oval proposal. You are invited to a community information session on **Tuesday 20th April 2010, from 4.30 pm to 7.30 pm at the North Epping Bowling Club, 132 Boundary Road, North Epping.** It will be a 'drop-in' session designed to allow members of the community to obtain further information on the proposal and raise any specific questions they may have with the relevant project staff and accredited experts present on the day. No RSVP is required.

Vodafone would like to hear your constructive comments on this proposal and welcome all contributions, to assist in the assessment of wider community opinion.

To have your comments considered or questions answered please forward them in writing to **Gerald Perera at PO BOX 125, St Leonards, NSW 1590**, via fax on 02 9478 9900 or make contact over the phone on 02 9478 9928. Submissions can also be made online at <http://community.tcipl.com.au>

Comments should be received by **Friday 30 April 2010.**

All feedback will be considered and responded to before a decision on whether to proceed with the installation is made.

Key Dates

Ask questions and share your views with us by 30 April.

Attend our 'drop in' community information session, 20 April between 4.30pm and 7.30pm.

We'll consider your comments and respond to you by 14 May.



vodafone

Briefing Note

Proposed Vodafone - Optus mobile telecommunications base station

Site location:

North Epping Oval, Boundary Road, North Epping NSW 2121

February 2010

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Prepared by Total Communications Infrastructure (TCI) on behalf of

Vodafone Hutchison Australia

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Attachments

- A Photomontage of the proposed installation

Introduction

The purpose of this briefing note is to brief identified stakeholders about Vodafone and Optus' (carriers') intentions with respect to a proposed 3G (Third Generation) low-impact telecommunications facility for the North Epping area.

Third Generation or 3G mobile phone networks and services

Mobile phones and wireless devices using 3G send and receive data much faster than 2G (Second Generation) systems, enabling many more features and applications to be possible. Compared to 2G, 3G can handle more voice calls and provides higher data communication rates and more advanced multimedia services, like video telephony and mobile broadband.

The Context for the Proposal

History of Proposals in the North Epping area

Since 2004, Vodafone has been seeking to locate a suitable site in the North Epping area to install a mobile telecommunications base station. The base station is required to provide 3G coverage to the area around North Epping Oval.

The nearest existing telecommunications base stations in the area are:

- Monopole site at 213 Kissing Point Road, South Turramurra (all carriers);
- Monopole site adjacent to M2 at Macquarie Park (all carriers);
- Monopole and various other installations at the M2 tunnel site at North Epping (all carriers); and
- Rooftop site at the Cheltenham Recreation Club, 60-74 The Crescent, Cheltenham (Optus and Telstra)

Vodafone and Optus currently operate their 3G network from all of the above-mentioned neighbouring base stations with the exception of the Cheltenham Recreation Club.

The proposed site at North Epping Oval intends to fill in coverage gaps that cannot be achieved by the existing neighbouring sites in the surrounding area. No other options were

available for co-location with existing telecommunications facilities, building structures or appropriate public utility infrastructure.

This Vodafone 3G network is being deployed in partnership with Optus. The objective of the proposal is to introduce Vodafone and Optus 3G data and voice services to the local area, bringing competitive voice, mobile internet and broadband services to local residents and businesses. Through an infrastructure sharing agreement, the proposed facility will enable both carriers to provide their new upgraded network service through sharing this single base station facility.

Vodafone is the lead carrier in undertaking acquisition and consultation activities in relation to this proposal.

Since 2004, five options have been considered in the area. These options are discussed in Table 1 below:

Table 1 – Options evaluation

	Option considered	Proposed installation	Suitability of site/ reasons for rejection
1.	Proposed new light pole at Woods Street Reserve, Woods Street, North Epping	Proposed new light pole of adequate height with antenna installations	This site is located on the northern fringe of the residential areas of North Epping. It is located too far north to achieve the required coverage objectives for this proposal.
2.	Proposed new flood light pole at North Epping Oval (north-eastern), Boundary Road, North Epping. Note this was proposed in 2007. Since then, lighting at the oval has been upgraded with 25m flood light poles).	Installation on proposed new 20m flood light pole to replace existing wooden pole (in 2007)	As the existing wooden pole (in 2007) was not of adequate height, Vodafone proposed to replace the wooden pole with a new 20m flood light pole to be owned by Council. Council was not supportive of this proposal.
3.	HV tower, north-east of Woods Street Reserve within Pennant Hills Park / Lane Cove National Park (off Woods Street), North Epping	Installation on existing HV tower	This site is located within a power line easement within Pennant Hills Park / Lane Cove National Park. Similar to Option 1, this site is located on the northern fringe of the residential areas of North Epping. As such, it is located too far north to achieve the required coverage objectives for this proposal.
4	Rooftop installation at North Epping Shopping Village, corner of Malton Road and Roma Street, North Epping	Rooftop installation	A rooftop installation at this location does not provide adequate height to achieve the required coverage objectives for the area. Also, this site is located too far away from the intended coverage area.

5	Installation on existing 25m flood light pole (near the club house), North Epping Oval, Boundary Road, North Epping	Low-impact installation on existing flood light pole	<p>Preferred option as:</p> <ul style="list-style-type: none"> • The site is located within the objective coverage area; • The flood light pole is of adequate height; and • Removes the need for the introduction of a new purpose built structure within the area.
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With limited suitable options available and following the recent installation of 25m flood light poles at North Epping Oval, Vodafone began to review its options at this location with consideration given to using this new lighting pole structure to install its antennas. We believe this proposal provides the best possible solution, in striking the balance between provision of telecommunications services to the area without the need for introducing a purpose built telecommunications structure such as a pole or tower.



Figure 1: Option 8 – proposed site location at North Epping Oval (map source: Google)

Consultation and consent for a 'low-impact' facility

The *Telecommunications Act 1997* requires telecommunications carriers to comply with state and territory laws in relation to the installation and operation of certain types of telecommunications facilities.

The legislation recognises that there are some telecommunications facilities and activities that are considered essential to building and maintaining telecommunications networks, but do not have a high visual impact. These facilities are commonly referred to as 'low-impact' and are described in the *Telecommunications (Low-impact Facilities) Determination 1997* (the Determination). Low-impact facilities are exempt from state and territory planning laws.

The proposal is for a low-impact telecommunications facility, as defined within the Determination. Therefore, the proposal does not require Council consent. However, carriers must at a minimum, consult with Council and the community in accordance with the provisions of the Australian Communications Industry Forum *ACIF 'Code for the Deployment of Mobile Phone Network Infrastructure'* (ACIF Code) which outlines the mandatory steps for mobile network carriers when deciding on the location and design of low-impact mobile phone base stations, including the requirements for consultation.

The ACIF Code stipulates that interested and affected persons or groups within the community have the opportunity to have their supportive or concerned views considered and responded to by the carriers who will make a decision about the proposal at the end of the consultation period.

Total Communications Infrastructure Pty Limited (TCI), as VHA's network deployment partner, will act on behalf of the carriers as the point of contact with respect to the consultation process for this proposal.

Proposed Vodafone – Optus Network Coverage

The objective of the proposal is for Vodafone and Optus to provide 3G (third generation or WCDMA 2100) coverage to the North Epping area around the North Epping Oval.

Details of the Proposal

The proposed facility consists of installing:

- Three panel antennas mounted on the existing flood light pole (near the club house) at 20m;
- One radiocommunications dish mounted on the external wall protruding above the rooftop of the southern corner of the club house. It is proposed to colour match the radiocommunications dish to that of the building;
- Three equipment units and one battery unit near the north-west corner of the tennis courts; and
- Associated works such as installation of antenna mounts, draw pits, underground conduits, feeder cables, underground power, distribution board, meter box, etc.

A photomontage of the proposed antennas and radiocommunications dish are provided in **Attachments A**.

Proposed Consultation – Key Activities and Dates

The consultation process has been designed to engage residential neighbours and interested stakeholders as recognised by the ACIF Code and the carriers.

Vodafone will endeavour to work with the local community by proactively providing information on the proposal, facilitating opportunity for comment by community members and by carefully considering and responding to community submissions in a timely manner, with the interest of working collaboratively to achieve the best possible outcome for this proposal.

The main components of the consultation process in the order in which they are to be undertaken is as follows:

Section of the ACIF Code	Component	Consultation time frame
5.4	Consultation letter to council requesting feedback on the proposal and the draft consultation plan.	22 Feb 10 – 12 Mar 10
	Stakeholder briefings and pre-consultation meetings with key stakeholders identified by VHA.	22 Feb 10 – 12 Mar Feb 10
5.5.6 (b)	Consultation letter to council in relation to the proposal.	TBC
5.5.6 (d)	Letterdrop to immediate residential neighbours.	TBC
5.5.6 (e)	Consultation letters to interested and affected stakeholders identified by VHA such as ward councillors, local MPs, school, after school care, sports clubs, etc.	TBC
5.5.6 (j)	Sign on site advertising the proposal.	TBC
	Public notice in the local paper advertising the proposal.	TBC

Way forward

The consultation plan in accordance with Section 5.4 of the ACIF Code has been submitted to Hornsby Sire Council on 22 February 2010. Concurrently, key stakeholders in the area will be contacted and offered a brief of the proposal with an opportunity to further discuss details with VHA via a meeting.

Attachment A: Photomontage of the proposed facility

		<p>Note: Looking south-west towards the proposed antennas and radiocommunications dish from North Epping Oval</p>	<p>This is a representation only. The final installation may vary slightly in size, shape and/or colour.</p>
<p>Copyright © 2010 The information in this document is subject to copyright and is not to be copied in whole or in part without the written approval of Pixelwise Pty Ltd.</p> <p>pixelwise 455 Mann St North Epping NSW 2186 P: +61 2 9480 1620 F: +61 2 9480 1620 www.pixelwise.com.au</p> <p>Level 1 115-120 Pyral St Sydney NSW 2025 T: 02-9479 9929 F: 02-9479 9920 www.tci.com.au</p> <p>tci Intelligent Solutions™ www.intelnet.com.au</p>	<p>Site #03-005 North Epping Oval Boundary Road North Epping, NSW 2121</p> <p>Design Title: Photomontage</p>	<p>ETS Site Name: Wood Street Reserve</p> <p>Site Number: 27195C</p> <p>Drawing No.: M01</p>	<p>vodafone</p> <p>Date: 27.01.10</p> <p>REV: A</p>

11.0 References

Associated Document	Location ⁶	Doc. No
Vodafone Group Mobile phones, masts and health Positions and Messages December 2009	V\EMF\VHA EME\EME Policies & Procedures Schedule	EMF003
Vodafone Group <i>Responsible Network Deployment</i> policy	V\EMF VHA\EME Policies & Procedures Schedule	VG RND Policy Final 20050215
VHA Precautionary Approach to Site Selection (ACIF C564:2004) Procedure	V\EMF\VHA EME\EME Policies & Procedures Schedule	EMEP005
VHA Health and Mobile Phone Technology Staff Awareness & Training	V\EMF\VHA EME\EME Policies & Procedures Schedule	EMEC 103
Vodafone EMF Toolkit	www.emftoolkit.com	
EMF Explained	www.emfexplained.info	
MCF Site Deployment Consultation Handbook	See VHA Community Relations Manager for hard copy	
GSMA/MMF risk communications web portal	http://www.rfnsa.com.au/nsa/logon.cgi user name: riskcomms password: gsma2010	

12.0 Document Control Log

12.1 Document (Procedure)

Version	Date	Authors	Summary of changes
Initial	14 Sept 2010	Sarah Whittington	Initial draft V1.2
Revised	14 December 2010	Sarah Whittington	V1.3
Revised	28 April 2011	Sarah Whittington	V1.4

12.2 Appendix 1 VHA Key Messages for RND

Version	Date	Authors	Summary of changes
initial	17 September 2010	Sarah whittington	Aligned with EMEC100 for health and Safety
Revised	28 April 2011	Sarah Whittington	Revised to update cumulative EME messaging

12.3 Appendix 2 Template Community Relations and Engagement Plan

Version	Date	Authors	Summary of changes
initial	17 September 2010	Sarah whittington	Draft Finalised
Revised	14 December 2010	Sarah Whittington	V1.3
Revised	28 April 2011	Sarah Whittington	V1.4

13.0 Document Approval

Name and Position	Signature	Date
Marek Ristwej, Head of Property		

⁶ All Associated VHA EMF/EME Documents in this table are ALSO located in the Vodafone Folder on the National Site Archive: <http://www.rfnsa.com.au> After Log In, in the left column, Click "Carrier Specific", then "Vodafone", then "VHA Policies and Procedures"