

# AMENDMENTS TO THE TELECOMMUNICATIONS (LOW-IMPACT FACILITIES) DETERMINATION 2018 AND TELECOMMUNICATIONS CODE OF PRACTICE 2021

## SUBMISSION OF NBN CO

2 December 2024

NBN Co (**nbn**) is grateful for the opportunity to provide feedback on the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (the **Department**) consultation on proposed changes to:

- The *Telecommunications (Low-Impact Facilities) Determination 2018 (LIFD)*; and
- The Telecommunications Code of Practice 2021 (**TCOP**).

Broadly nbn is supportive of the proposed changes outlined in the Department's accompanying consultation paper. More specifically, nbn wished to highlight that:

- proposed changes to the size of solar panel arrays considered low impact (item 7, part 3) may lay the foundation for future programs to assist nbn, as one of the largest power users in Australia, in meeting net zero targets, by unlocking new co-funding opportunities based on these new sizes. Additionally, from a resilience perspective, it may also provide opportunities for programs to enable improvement to the Hybrid Power Cubes nbn makes available for use as an interim power supply for telecommunications.
- Inclusion of on/underbridge cabling as low impact facilities (Items 11 to 13, part 3) is likely to normalise such cabling with land owners, which is likely to indirectly benefit nbn in its dealings. While nbn is able to, and does, rely on other provisions in the LIFD for the installation of cabling, setting clearer expectations with land owners about what is considered low impact is likely to reduce confusion and therefore delay. nbn welcomes this change as a way to promote greater consistency across the industry, and may enable more opportunities for carriers to co-locate facilities.

While not a change proposed by the Department, nbn notes that the LIFD continues to only apply to solar panel arrays in 'rural' areas. nbn believes that it would be of benefit to extend this usage to 'commercial' and 'industrial' areas where nbn also deploys Hybrid Power Cubes as interims. These systems would be consistent with their surroundings, albeit often on a smaller scale.

nbn is heartened to see amendments which reflect the changing nature of telecommunications infrastructure, and recognise the increasing needs of Australia into the future. Should the Department wish to discuss any of these matters further, nbn requests that it should contact

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