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Via email to: new.developments@infrastructure.gov.au

RE: Possible amendments to the Telecommunications in New Developments Policy

To whom it may concern,

I am writing on behalf of Waveconn to provide feedback on the Australian government's proposed Telecommunications in New Developments (TIND) policy. Waveconn is a mobile network infrastructure provider (MNIP) that develops, owns and operates mobile phone towers across Australia, leasing space to mobile network operators (MNOs). We have significant expertise deploying infrastructure in new developments and welcome the intent of this policy. However, we recommend some amendments to align with recent structural changes in the industry and more effectively achieve the policy aims.

About Waveconn

Waveconn owns roughly 1,400 mobile towers and rooftop sites nationwide following acquisitions from TPG and Stilmark Holdings. We are 100% owned by OMERS Infrastructure. Our focus is on deploying, owning and managing mobile infrastructure in metro and outer metro areas. Waveconn's clients include the three major MNOs, government radio networks and other tenants. We are entirely independent with no direct or indirect MNO ownership.

MNIPs now leading deployments

In the past two years, Telstra, Optus and TPG (Vodafone) have divested their tower portfolios to independent MNIPs like Waveconn. MNIPs now deploy the majority of new mobile towers used by the MNOs. The policy should recognise MNIPs as primary stakeholders in new developments, not just MNOs.

Waveconn's capability and experience

Waveconn is actively working with developers in masterplan communities to deliver timely mobile coverage to new residents. We take both short and long-term views, building towers needed in the next 1-2 years while also securing sites for deployment up to 7 years out. We have 41 active opportunities with 11 developers and are engaged with 51 developers across 130 developments nationally.

Comments on draft policy

- The policy should cover independent MNIPs, not just MNOs, given our integral role. MNOs often do not prioritise long-term developments where they do not align with their planning cycles. Their incentives are not necessarily aligned with solving this policy issue.
- We suggest limiting obligations to large-scale masterplan communities where inadequate existing coverage necessitates new infrastructure. Smaller projects of just a few dwellings may not warrant dedicated mobile towers and would create unnecessary red tape.
- Tower companies like Waveconn are better placed than individual carriers for early site selection and deployment in new developments. Engaging carriers directly could lead to suboptimal tower locations favouring one carrier over a neutral approach accommodating all carriers.

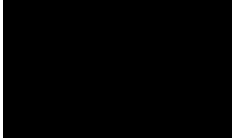
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- There are also uncertainties around requiring carriers be engaged 12 months prior to occupancy. In major developments, we are securing sites 7+ years out. Mandated timeframes could create impractical expectations.

In summary, while Waveconn supports the policy intent, changes recognising mobile network infrastructure providers integral role and allowing flexibility in solutions would strengthen outcomes. Waveconn has extensive experience successfully partnering with developers proactively. I welcome further discussion on optimising the policy framework. Please feel free to contact me with any questions.

Regards,



Erin Buyers
Head of Strategic Partnerships & Sales

