



Hay Shire
COUNCIL

Hay Shire Council

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Ref:G17/1596

20 July, 2017

The Director Consulting Policy
Department of Communication and the Arts
GPO Box 2154
CANBERRA ACT 2615

Powersandimmunities@communications.gov.au

Dear Sir/Madam

Re: Possible Amendments to the Telecommunications Carrier Powers and Immunities

Thank you for providing the opportunity to make the following comments on the possible amendments to the Telecommunications Act 1997 (Cth):

- Health risk – like all Local Water Utilities, Council is required to provide safe drinking water to its customers. A significant component of Council's strategy to achieve this aim is to warrant the integrity of its water storage reservoirs, and Council takes appropriate steps to ensure staff who access such reservoirs are trained in the processes and protocols necessary to eliminate any health risks occasioned by that access.

Access to a reservoir by untrained/unqualified personnel working for an outside organisation cannot be certain to have this training and Council would therefore have no assurance that accidental or careless contamination of the water supply would not occur.

The penetration of the roof or walls of the reservoir to install communications infrastructure can provide egress points for vermin; birds; rodents etc which, in turn, can contaminate water supplies.

- Access restrictions – the installation of communications infrastructure such as antennae, cable trays, cabinets etc can restrict access by Council operators and/or contractors undertaking maintenance and renewal activities.
- Work Health & Safety – depending on the type of installation proposed, electromagnetic energy may be generated making it unsafe to access certain areas of the reservoir structure. Council's ability to maintain and service its facility would be compromised.

In closing, I submit that any amendment to the Act must address the matters raised above and provide a means for a water supply authority to refuse to allow the installation of a

telecommunications facility on its assets if there is deemed to be an unacceptable risk to public health or the safety of its employees.

If you require any further information please contact Council's Consultant Engineer, Mr Bill Moore on 0417 697 879 or bmoore@hay.nsw.gov.au

Yours faithfully,



Kirstyn Thronder
Acting General Manager