

21 July 2017

Construction Policy Team
Market Structure Branch
Department of Communications and the Arts
GPO Box 2154
Canberra ACT 2601

By email to: powersandimmunities@communications.gov.au

Submission re Possible amendments to telecommunications powers and immunities

Superloop Limited (**Superloop**) thanks the Department of Communications and the Arts for the opportunity to respond to for the opportunity to respond to its consultation paper on 'Possible amendments to telecommunications powers and immunities'. Superloop have responded to the Department's questions using the submission template provided.

Superloop broadly supports the proposed amendments, but holds the view that the **all low-impact facilities should be able to be installed by all licensed Australia telecommunications carriers. A facility should not be deemed "low-impact" based upon which carrier installs it, but rather by reference to impact on visual amenity.**

At the request of nbn Co, the proposed amendments include adding the ability to install poles for telecommunications and electricity cabling to be installed as a low-impact facility. The mark-up of the LIFD contained in the Department's consultation does not include the mark-up required to address this request, so it is not clear whether poles will join the other 15 facilities only able to be installed by nbn Co. This ambiguity is concerning to Superloop – refer to the comments at item 21 of the **attached** submission.

Should you have any questions or require any further information, Superloop would be happy to discuss this submission in further detail. If Superloop can be of any further assistance please do not hesitate to contact Simone Dejun, General Counsel on simone.dejun@superloop.com or by phone 07 3905 2414.

Yours faithfully,



Bevan Slattery
Chief Executive Officer
Superloop Limited

To the Department of Communications and the Arts
GPO Box 2154
Canberra ACT 2601

Submission response—Possible amendments to telecommunications powers and immunities

This submission can be published on the World Wide Web

Yes

Date of submission

21 July 2017

Logo of organisation—if an organisation making this submission



Name and contact details of person/organisation making submission

Simone Dejun
General Counsel
Superloop Limited
Level 17, 333 Ann Street
Brisbane, QLD 4000
Ph: 07 3905 2414
Email: notices@superloop.com

General comments

Superloop Limited (**Superloop**) thanks the Department of Communications and the Arts (the **Department**) for the opportunity to respond to its consultation paper on 'Possible amendments to telecommunications powers and immunities'. Superloop have responded to the Department's questions using the submission template provided.

Superloop agree that many of the proposed amendments will result in cost savings to the industry, including allowing the use of cheaper, readily available components that are better suited to new proposed measurements and in reducing administrative costs. As highlighted by the Department,

industry cost savings then lead to consumer economic benefits.

Much of the proposed amendments are of most importance to Superloop's subsidiary company, BigAir Group Pty Ltd (**BigAir**) and its subsidiaries.

Superloop would be pleased to provide further information or assistance to the Department in its consultation if required.

About Superloop

Superloop is a leading independent provider of digital services in the Asia Pacific region. The Superloop Group owns and operates over 590 km of carrier-grade metro fibre networks in Australia, Singapore and Hong Kong, connecting more than 250 of the region's key data centres and commercial buildings.

The Group also operates businesses including BigAir Group, APEXNetworks, CINENET Systems and SubPartners.

BigAir Group provides a diverse range of ICT services to small-to-medium enterprises, government, retail, mining and education customers across Australia. It offers network infrastructure, Cloud-based solutions and managed services, including communications and WiFi into student campuses. BigAir owns an advanced, large-scale fixed wireless broadband network, including more than 300 wireless PoPs, delivering business-grade services at speeds up to 1Gbps.

Superloop recently acquired submarine cable infrastructure provider, SubPartners, expanding its trans-Australian and international capacity.

Low-impact facilities

Superloop's primary concern in relation to the proposed amendments to telecommunications powers and immunities is that it proposes further facilities that may be installed as "low-impact facilities" at the request of nbn Co.

There are currently 15 facilities listed in the Schedule to the LIFD that are only able to be installed a carrier where that facility "is, or is to be, part of a national network used, or for use, for the high-speed carriage of communications, on a wholesale-only and non-discriminatory basis." Clearly, this is drafted to refer to nbn Co, which is confirmed by the Explanatory Statement to the amendments that introduced this wording.

The proposed amendments suggest, at the request of nbn Co, adding the ability to install poles for telecommunications and electricity cabling. The amendments do not propose to allow similarly grouped facilities such as towers or masts to be permitted. However, the mark-up of the LIFD contained in the Department's consultation does not include the mark-up required to address this request, so it is not clear whether poles will join the other 15 facilities only able to be installed by nbn Co.

Superloop strongly believe that a facility should not be deemed “low-impact” based upon which carrier installs it, but rather by reference to impact on visual amenity. We refer to the definition expressed in the Explanatory Statement to the 2011 amendment of the LIFD:

“LIFs [Low-impact Facilities] are facilities which are considered vital to the operation of networks and are of low visual impact.”

Therefore, Superloop would strongly suggest the removal of (b) in each of:

- the definition of “in-building subscriber connection equipment” in section 1.3;
- Schedule 1, Part 3, Item 8 (External building connection equipment);
- Schedule 1, Part 3, Item 9 (Internal building connection equipment);
- Schedule 1, Part 3, Item 10 (In-building network equipment);
- Schedule 1, Part 4, Item 6 (Underground network equipment);
- Schedule 1, Part 4A, Item 1 (A single line link or bundle of line links);
- Schedule 1, Part 4A, Item 2 (Optical node);
- Schedule 1, Part 4A, Item 3 (Splice enclosure);
- Schedule 1, Part 4A, Item 4 (Access terminal);
- Schedule 1, Part 4A, Item 5 (A single drop cable or bundle of drop cables);
- Schedule 1, Part 4A, Item 6 (Premises connection device);
- Schedule 1, Part 4A, Item 7 (Network termination device);
- Schedule 1, Part 4A, Item 8 (Power supply);
- Schedule 1, Part 4A, Item 9 (Amplifier); and
- Schedule 1, Part 4A, Item 10 (Auxiliary network equipment).

As mentioned in response to a number of questions below, Superloop would also suggest a number of the facilities be permitted in Residential areas, but only where installed on larger, multi-tenanted buildings (e.g. apartment blocks).

Responses

The Australian Government seeks views on possible amendments to telecommunications carrier powers and immunities. In particular, the Government seeks views on:

Proposed amendments to the Telecommunications (Low-impact Facilities) Determination 1997

1. Definition of co-located facilities

1.1 Are there any issues with this proposed clarification to the definition of co-location?

We believe the proposed insertion is not necessary, as the current definition includes the words “on or within.” However, we do not consider the proposed insertion to be problematic.

2. Local government heritage overlays

2.1 Are there any issues with this clarification in relation to local government heritage overlays?

The Superloop Group is supportive of this clarification. Heritage overlays are a local government planning tool, and, as the Department noted, may capture entire suburbs and localities. Buildings and land are added to such overlays at the discretion of local

government, which may apply different tests to State/Territory and Federal heritage registration bodies.

3. Radio shrouds as an ancillary facility

- 3.1 Should radio shrouds be considered ancillary facilities to low-impact facilities, or should radio shrouds be listed as distinct facilities in the Schedule of the LIFD?

It is our view that it would be better to list radio shrouds as a distinct facility in the Schedule of the LIFD, rather than amending 3.1(4) to specifically include radio shrouds as ancillary facilities.

- 3.2 If listed as distinct facilities in the Schedule of the LIFD, should there be any criteria for radio shrouds, for example in terms of size and dimensions?

As many other facilities within the Schedule of the LIFD have size and dimension criteria, it is appropriate to include such criteria for radio shrouds. However, in most cases the shroud will be larger than the size and dimensions of the radio facility that it is screening. It would be sensible to express such criteria by reference to the facility that it is screening – such as *“extending not more than XX millimetres in wider and not more than XX millimetres higher than the facility to which the shroud is attached.”*

4. Size of radiocommunications and satellite dishes

- 4.1 Are there any issues with permitting 2.4 metre subscriber radiocommunications dishes (or terminal antennas) in rural and industrial areas (LIFD Schedule, Part 1, Item 1A)?

While BigAir rarely use dish or antennae of this size, Superloop agree with the Department that an increase in facility size of 60 cm will have minimal visual impact in rural and industrial areas. We support the proposal to increase the size of radio communications and satellite dishes in rural and industrial areas from 1.8 meters to 2.4 meters in diameter.

- 4.2 Are there any issues with permitting other 2.4 metre radiocommunications dishes in rural and industrial areas, including those located on telecommunications structures (LIFD Schedule, Part 1, Item 5A)?

As BigAir rarely use dish or antennae of this size, Superloop has no further comment.

5. Maximum heights of antenna protrusions on buildings

- 5.1 Is a 5 metre protrusion height acceptable, or is there a more appropriate height?

BigAir purchase masts ‘off the shelf’ in 3 metre segments, which is a commonly produced size. Therefore, we believe a height of 6 meters is more appropriate than 5 meters, because it is achieved using two such segments. The use of these inexpensive mast solutions will result in lower costs for deployment, driving costs down and providing a more competitive environment in the provision of the relevant services.

More often, BigAir install more 9 meter masts than 6 meter masts, in order to overcome ‘Line of Sight’ issues. Superloop therefore suggest that 9 meter masts may be an even more appropriate height limit.

- 5.2 Are higher protrusions more acceptable in some areas than others? Could protrusions higher than 5 metres be allowed in industrial and rural areas?

Yes, Superloop support higher protrusions in industrial and rural areas – potentially up to 15 meters. In Commercial areas, we would suggest a limit of 6 or 9 meters is more appropriate.

In Residential areas, Superloop suggest that any increase in size from the existing limit of 2.8 meters and protruding by no more than 3 meters would only be appropriate for large, multi-tenanted buildings (e.g. apartment blocks) where the overall visual impact is in line with the size of the building. An increase in size of such facilities is less appropriate for individual detached dwellings (houses).

6. Use of omnidirectional antennas in residential and commercial areas

- 6.1 Are there any issues with permitting omnidirectional antennas in residential and commercial areas, in addition to industrial and rural areas?

Because of the size and visual impact of such facilities Superloop would only support allowing omni-directional antenna to be installed in Residential Areas on large, multi-tenanted buildings.

Superloop does support allowing omni-directional antennae to be installed in Commercial areas.

7. Radiocommunications facilities

- 7.1 Does the proposed approach raise any issues?

Superloop questions why a cabinet needs to be specified in the proposed new Part 1 Item 6, given the new proposed Part 3 Item 2A. If the answer is that the cabinet that forms part of the 'Radiocommunications facility' at Item 6 must be attached to the facility, rather than *near* the facility as the cabinet in Part 3 is described, it should be made clear. That is, Part 1, Item 6 (b) should read:

“(b) with a cabinet, *if attached*, that does not exceed 1 cubic meter in volume”

Superloop have no concern in relation to the minor increase of 200mm in antenna height.

- 7.2 Are the proposed dimensions for these facilities appropriate?

Except as outlined in Superloop's response to 7.1 above, the proposed dimensions are appropriate.

8. Equipment installed inside a non-residential structure in residential areas

- 8.1 Should carriers be able to enter land (including buildings) to install facilities in existing structures not used for residential purposes in residential areas?

Superloop support the ability of carriers to enter land (including buildings) to access existing structures used for non-residential purposes in Residential areas to install facilities.

Superloop also suggest that this ability be extended to large, multi-tenanted buildings (e.g apartment blocks), but agree it would not be appropriate for individual, detached dwellings (houses).

9. Tower extensions in commercial areas

9.1 Are there any issues permitting tower height extensions of up to five metres in commercial areas?

Superloop support the extension of height, but suggest the new limit be 6 meters, rather than 5 meters, so the tower segments can be purchased in 3 meter segments. As outlined in 5.1 above, the use of these inexpensive mast solutions will result in lower costs for deployment, driving costs down and providing a more competitive environment in the provision of the relevant services.

Superloop would not support extensions higher than 6 meters due to the associated increase in OH&S risks.

10. Radiocommunications lens antennas

10.1 Is lens antenna the best term to describe this type of antenna?

“Lens antenna” is the name of a specific product nbn Co intend to use. Superloop prefer the term “directional antenna”, which aligns better with the use within the LIFD of the term “omni directional antenna”.

Superloop have installed smaller versions of the same facility as a “radio dish” as outlined in the LIFD Schedule, Part 1, Item 1 or 1A.

It is Superloop’s preference to have the facility described in the broader term “directional antenna” rather than “lens antenna” to better capture new technology as it is brought to market.

10.2 Are 4 cubic metres in volume and 5 metres of protrusion from structures appropriate?

Superloop is of the view that a 5 meter protrusion is larger than appropriate. Superloop suggest that a 2 meter limit on protrusion is more appropriate, and in line with other facilities (for example omnidirectional antenna)

Superloop agree that cubic meters is an appropriate measurement, rather than dish diameter, due to the arm that protrudes from the centre of the dish.

10.3 Should this type of antenna be allowed in all areas, or restricted to only industrial and rural areas?

Superloop agree that this type of antenna should be allowed in Commercial, Industrial and Rural areas. Superloop would also support this type of antenna being allowed to be installed on larger, multi-tenanted buildings in Residential areas, but not smaller, detached dwellings.

11. Cabinets for tower equipment

11.1 Are there any issues with the proposed new cabinet type?

Superloop support this proposal, however Superloop believes there is some redundancy between the facility “cabinet” at the new proposed 2A and the facility “equipment shelter” detailed in Part 3, Item 5, for which much larger measurements already apply. “Equipment

shelter” in Item 5 is a facility used solely to house equipment used to assist in providing a service by means of a facility mentioned in Part 1, with a base area of not more than 7.5 meters and less than 3 meters high.

These larger measurements of an equipment shelter will allow a carrier to install two (or more) racks within the shelter of a standard size to house the related equipment.

12. Size of solar panels used to power telecommunications facilities

- 12.1 Are there any issues with permitting 12.5 square metre solar panels for telecommunications facilities in rural areas?

Superloop support the use of solar panels in rural area and foresee no issue with the increase to a 12.5 square metre limit.

13. Amount of trench that can be open to install a conduit or cable

- 13.1 Are there reasons not to increase the length of trench that can be open at any time from 100m to 200m in residential areas?

Superloop does not foresee any reason not to allow this, as long as the carrier ensures that access to properties is maintained via a suitable temporary surface.

- 13.2 Is 200m an appropriate length, or should the length be higher if more than 200m of conduit or cabling can be laid per day and the trench closed?

Superloop believes that the length should be as long as can be managed by the carrier in a single day.

14. Cable & conduit installation on or under bridges

- 14.1 Are there any issues with allowing cable and conduit on bridges to be low-impact facilities?

No, Superloop do not believe there is any issue in allowing cable and conduit on bridges to be low-impact facilities. Superloop supports allowing cable and conduit on bridges to be low-impact facilities.

15. Volume restrictions on co-located facilities

- 15.1 Are there any issues with removing volume limits for adding co-located facilities to existing facilities and public utility structures in commercial areas?

Provided that the addition of the new co-located facility is sound from an engineering point of view, Superloop believes the removal of the volume limit is sensible, as there are size restrictions elsewhere in the schedule in relation to the individual type of facilities. Superloop notes that the volume of a facility installed on a street sign is a different to the volume that could be installed on a water tower.

Superloop suggests clarifying that a co-located area may only be installed in the same area that the type of facility would ordinarily be able to be installed if it wasn't co-located.

- 15.2 Are there any issues with permitting new co-located facilities that are up to 50 per cent of the volume of the original facility or public utility structure in residential areas?

Provided that the addition of the new co-located facility is sound from an engineering point of view, Superloop does not find any other issue with permitting new co-located facilities up to 50 per cent of the volume of the original facility or public utility structure in residential areas, as there are size restrictions elsewhere in the schedule in relation to the individual type of facilities. Superloop notes that the volume of a facility installed on a street sign is a different to the volume that could be installed on a water tower.

Superloop suggests clarifying that a co-located area may only be installed in the same area that the type of facility would ordinarily be able to be installed if it wasn't co-located.

- 15.3 Is another volume limit more appropriate in commercial or residential areas?

Superloop do not believe that volume is an appropriate measurement. Instead the measurement should be linked to the size restrictions for the same type of facility if it were not co-located, and there should be a requirement to ensure the installation is sound in terms of engineering.

- 15.4 Should alternative arrangements for co-located facilities be developed in the LIFD?

Superloop is unsure of the scope of this question.

16. Updates to environmental legislation references in the LIFD

- 16.1 Are there any issues with the proposed updates?

No, Superloop does not foresee any issue with the proposed updates.

- 16.2 Are there any further suggestions for updates to terms and references in the LIFD?

There are currently 15 facilities listed in the Schedule to the LIFD that are only able to be installed a carrier where that facility "is, or is to be, part of a national network used, or for use, for the high-speed carriage of communications, on a wholesale-only and non-discriminatory basis." Clearly, this is drafted to refer to nbn Co, which is confirmed by the Explanatory Statement to the amendments that introduced this wording.

Superloop strongly believe that a facility should not be deemed "low-impact" based upon which carrier installs it, but rather by reference to impact on visual amenity. We refer to the definition expressed in the Explanatory Statement to the 2011 amendment of the LIFD:

"LIFs [Low-impact Facilities] are facilities which are considered vital to the operation of networks and are of low visual impact."

Therefore, Superloop would strongly suggest the removal of (b) in each of:

- the definition of "in-building subscriber connection equipment" in section 1.3;
- Schedule 1, Part 3, Item 8 (External building connection equipment);
- Schedule 1, Part 3, Item 9 (Internal building connection equipment);
- Schedule 1, Part 3, Item 10 (In-building network equipment);
- Schedule 1, Part 4, Item 6 (Underground network equipment);
- Schedule 1, Part 4A, Item 1 (A single line link or bundle of line links);
- Schedule 1, Part 4A, Item 2 (Optical node);

- Schedule 1, Part 4A, Item 3 (Splice enclosure);
- Schedule 1, Part 4A, Item 4 (Access terminal);
- Schedule 1, Part 4A, Item 5 (A single drop cable or bundle of drop cables);
- Schedule 1, Part 4A, Item 6 (Premises connection device);
- Schedule 1, Part 4A, Item 7 (Network termination device);
- Schedule 1, Part 4A, Item 8 (Power supply);
- Schedule 1, Part 4A, Item 9 (Amplifier); and
- Schedule 1, Part 4A, Item 10 (Auxiliary network equipment).

Proposed amendments to the Telecommunications Code of Practice 1997

17. Clarify requirements for joint venture arrangements

- 17.1 Are there any issues with making it clear in the Tel Code that only one carrier's signature is required on documents for facilities being installed as part of a carrier joint venture arrangement?

Superloop does not foresee any issue with this clarification.

18. LAAN objection periods

- 18.1 Is it reasonable to end the objection period for low-impact facility activities and maintenance work according to when the notice was issued, rather than the date work is expected to commence?

Superloop strongly support measuring the end of the objection period for low-impact facility activities and maintenance work according to when a low-impact activity notice is issued, rather than the date the work is expected to commence.

Carriers typically select the date they propose to commence the activity by reference to the LAAN notification and objection period. If they do not intend to commence on that date, and often do not as arranging contractors and materials can take some time, the carrier will specify a much later end date which creates a lengthy window of time in which the carrier will carry out the work.

Measuring the objection period from the date the notice is issued (or, more accurately, the date it is received by the recipient) means that a carrier can be more specific and realistic in the proposed dates for conducting the activity, which is of benefit to both carriers and notice recipients.

- 18.2 Is 5 business days from the receipt of a notice a sufficient time period for land owners and occupiers to object to carrier activities where carriers have given more than 10 days' notice about planned activities?

Superloop believe that 5 business days receipt is sufficient notice. If anything, given the essential nature of telecommunications services, Superloop would suggest that a shorter notice period apply to maintenance activities where that activity is for the purpose of repairing an existing facility in a manner that will not add to the visual impact of the facility.

19. Allow carriers to refer land owner and occupier objections to the TIO

- 19.1 Are there any issues with allowing carriers to refer objections to the TIO before land owners and occupiers have requested them to?

Superloop do not have any issue with allowing carriers to refer objections to the TIO before land owners and occupiers have requested the same, provided that such referral does not take place prior to the conclusion of the consultation period of 25 business days after receiving the objection.

As the carrier bears the cost of TIO referrals, and such referrals are treated as Level 4 complaints and therefore quite expensive, it is expected that a carrier would not refer objections without reason.

20. Updates to references in the Tel Code

- 20.1 Are there any issues with the proposed changes?

Superloop has no concerns with the proposed changes to update references within the Tel Code.

- 20.2 Are there any further suggestions for updates to the Tel Code?

Superloop suggests that, in addition to the proposals in 19.1 above, carriers be permitted to refer objections to the TIO prior to the conclusion of the 25 business day consultation period where the objection is raised by an objector who has made three (3) or more objections to that same carrier on substantially identical grounds. Superloop would also suggest that such objections referred are treated as a lower level complaint, or a lower fee is applied to the carrier, given that the TIO has previously considered the same material.

Possible amendments to the *Telecommunications Act 1997*

21. Allowing some types of poles to be low-impact facilities

- 21.1 Is it reasonable for poles in rural areas for telecommunications and electricity cabling for telecommunications networks to be low-impact facilities?

The mark-up of the LIFD contained in the Department's consultation does not include the mark-up required to address this request, so it is not clear whether poles will join the other 15 facilities only able to be installed by nbn Co. This ambiguity is particularly concerning as Superloop do not believe that a certain types of facility should only be permitted to be installed by certain carriers. If a facility is deemed to be low-impact, any carrier should be permitted to install such a facility.

Superloop would like to see the proposed amendment allowing some types of poles to be low-impact facilities to capture monopoles installed in Rural areas. Therefore, Superloop would also suggest removal of the reference to cabling in the proposed amendment.

It is Superloop's view that the installation of such facilities should also be to meet subscriber demand, and not solely for extension of network reach.

As well as poles, Superloop would also like to see masts permitted to be low-impact facilities in Rural areas.

Lastly, Superloop notes that the Consultation Paper released does not include the word 'rural' in this question, but Superloop agrees that such facilities are only appropriate to be installed as low-impact facilities in Rural areas.

21.2 Should low-impact facility poles be allowed in other areas, or be restricted to rural areas?

Superloop support allowing low-impact facility poles in Rural and Industrial areas.

21.3 Is the proposed size restriction of up to 12 metres high with a diameter of up to 500mm suitable?

Superloop would suggest a size restriction of 15 metres is more desirable. If guy wires were permitted, which would extend beyond the 500mm diameter specified, it may be that a telomast (such as the one manufactured by Hills) could be installed under such an amendment, which Superloop believe are of no further impact in Rural areas than the other poles proposed.

21.4 Would the existing notification and objection processes for land owners and occupiers in the Tel Code be sufficient, or should there be additional consultation requirements?

Superloop believe the existing notification and objection processes for land owners and occupiers to be sufficient, noting that if an objection is not resolved during the consultation period outlined in the Tel Code, the objector may refer the matter to the Telecommunications Industry Ombudsman to resolve.

22. Portable temporary communications facilities

22.1 - Are there any issues with making portable temporary communications equipment exempt from state and territory planning approvals under certain conditions?

Superloop strongly support allowing portable temporary communications equipment being exempt from State and Territory planning approvals in certain conditions – specifically where the size of the facility is reasonable and the proposed duration of the installation is reasonable.

There are approximately three instances in the last three years in which BigAir had wished to temporarily install a portable facility, but was unable to do so due to delays in seeking approval.

The ability to install such facilities would be beneficial for addressing disaster relief, delays in repair of existing facilities or delays in installing new facilities

22.2 - Are there any suggestions for appropriate conditions for the installation of COWs and SatCOWs, such as circumstances in which they can be used and timeframes for their removal?

Superloop have not installed such facilities but have no objection to the proposal in general. However, Superloop would suggest moving away from design-specific language such as "Cells on wheels", "Satellite Cells on wheels", "COW", and "SatCOW", noting these terms are used most often by Telstra. Superloop have a strong preference for more generic, descriptive terms to be used in order to allow other providers to install similar services and to capture future advances in technology that have similar features.

22.3 - Should the Act be amended to remove any doubt that MEOWs can be installed using the maintenance powers or another power under Schedule 3 of the Act?

Superloop have not installed such facilities but have no objection to the proposal in general. However, Superloop would suggest moving away from language such as "MEOW" or "Mobile Exchange on Wheels", noting in this case that "MEOW" and "MEOW – Mobile Exchange on Wheels" are registered trade marks belonging to Telstra Corporation Limited. While few other carriers are likely to install such facilities, Superloop have a strong preference for more generic, descriptive terms to be used in order to capture future advances in technology that have similar features.

22.4 - Are there any suggestions for appropriate conditions for the installation of MEOWs if the maintenance powers are amended?

Superloop suggest considering the length of time the MEOW is proposed to be installed in the one area in considering whether it is a maintenance activity. Superloop would support a reduction in notification periods where a MEOW is proposed to be installed for a short period for the purpose of restoring disrupted services, in line with Superloop's suggestion in 18.2 above.

23. Replacement mobile towers

23.1 Is the proposal reasonable?

Superloop do not install such facilities but have no objection to the proposal.

23.2 Is 20 metres a suitable distance restriction for replacement towers?

Superloop do not install such facilities but have no objection to the proposal.

23.3 Is 12 weeks a reasonable maximum time period for installation of replacement towers?

Superloop do not install such facilities but have no objection to the proposal.

24. Tower height extensions

24.1 Are one-off 10 metre tower height extensions suitable in commercial, industrial and rural areas, or only some of these areas? If they are only suitable in some areas, which are they and why?

Superloop support one-off 10-meter tower height extensions in each of Commercial, Industrial and Rural areas.