

## MCF Operational Bulletin November 2009 Edition

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### Christmas / New Year ACIF Code Guidance C564:2004

The Christmas and New Year holiday period is fast approaching and in accordance with ACMA Operational Practice, the following dates have been determined in relation to ACIF Consultation processes during this period. Please ensure these guidelines are adhered to when planning and conducting consultations during the months of December 2009 and January 2010.

If you have any queries, please email [helen.greenwood@amta.org.au](mailto:helen.greenwood@amta.org.au)

### Council Comments

- Last day planners can send correspondence to Council is Friday 18<sup>th</sup> December 2009.
- "Non Business days" are from Monday 21<sup>st</sup> Dec 2009 to Friday 1<sup>st</sup> Jan 2010 inclusive.
- 5 days + 2 clear days for postage means Council will have until 5pm Thursday 14<sup>th</sup> January 2010 to comment.
- Carriers to advise council additional time may be available on request.

### Community Comments

- Last day planners can send correspondence to Community members is Friday 11<sup>th</sup> December 2009.
- "Non Business days" are from Monday 14<sup>th</sup> Dec 2009 to Monday 4<sup>th</sup> Jan 2010 inclusive.

- 10 days + 2 clear days for postage means that the community members have until 5pm Thursday 21<sup>st</sup> January 2010 to comment.

Council can of course provide further comment as well during this period.

### Newspaper Ads

Ads should not be published during any of the agreed "Non Business days" for community consultation between Monday 14<sup>th</sup> December 2009 to Monday 4<sup>th</sup> January 2010, inclusive.

### Science and Wireless 2009

The Australian Centre for RF Bioeffects Research (ACRBR), based at Swinburne's Hawthorn campus, will hold its annual conference on 17<sup>th</sup> November, with keynote speaker, Dr Bernard Veyret of the International Commission on Non-Ionizing Radiation Protection (ICNIRP).

Dr Veyret is head of the Bioelectromagnetics Laboratory of the 'École Pratique des Hautes Études' in France, and was one of the founding members of the European Bioelectromagnetics Association (EBEA) in 1989. Dr Veyret has authored 80 papers in peer-reviewed journals and co-authored several national and international expert-group reports on EMF and health.

Dr Bernard Veyret will provide an overview of the state of the science, following a busy year for radiofrequency research in the news. Dr Veyret's talk will be followed by a response from the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA), providing the Australian perspective on the facts.

More information will soon be released and can be found at <http://acrbr.org.au/SW2009/SW09.aspx>. To register your interest email [events@acrbr.org](mailto:events@acrbr.org).

## Best Practice Consultation Case Studies

The following case studies provide sharing of lessons learnt by carrier consultation teams across the country. There are many examples which demonstrate the effectiveness of existing regulatory frameworks, including the industry code ACIF C564:2004 *Deployment of Mobile Phone Network Infrastructure*, in ensuring effective engagement with community stakeholders interested in the deployment of mobile telecommunication facilities in their local area.

If you have a story that you would like to share please contact Helen Greenwood at the MCF on (03) 9684 3419 or [Helen.greenwood@amta.org.au](mailto:Helen.greenwood@amta.org.au).

### **Get Your message Out**

As you would expect, community concerns about health and the visual impacts of mobile telecommunications facilities can result in ongoing community opposition to proposals which leads to negative media, planning refusals and complaints to industry regulators. Understanding a community and how to reach them with your message is critical when preparing both development applications to council and community engagement strategies, under the industry code ACIF C564:2004.

### **The challenge of reaching everyone first**

No matter how diligent and far reaching your communication is, it is not always possible to reach all interested and affected parties. Consultation practitioners must be able to demonstrate reasonable efforts to reach as many community stakeholders as possible.

## Turning up pressure on mobile phone carriers

The quickest way to lose the front foot and turn your proactive engagement program into a reactive strategy is to allow key stakeholders to find out about your proposal through the grapevine. This can be challenging when consultation is conducted through a council DA planning process. However, where a high level of community concern is

anticipated, additional pre-consultation by the carrier will assist in delivering a balanced message on the benefits and impacts of the proposal to the wider community and will help to achieve the stakeholder dialogue necessary for consultation.

Design a proactive, informative and inclusive engagement program which demonstrates recognition of community interests, willingness to work with local community and the benefits of mobile telecommunications to the wider community. Following are examples and ideas that could be used within your engagement program.

### **Using Advertorials**

In the past year, each carrier has successfully utilised advertorials across the country to provide proposal specific information, details on mobile technology and health and to explain the parameters of the consultation program to communities. Generally the content of your advertorial should:

- set the context of a sensitive proposal,
- outline the history of the carrier's efforts to provide services to local communities,
- communicate the need for proposed sites to improve coverage in local areas,
- articulate the rationale for the proposal being considered the best in terms of location and design and regulatory requirements being met,
- include links to up to date research and information on mobile technology and health, &
- include the details of how and when interested parties can participate in consultation.



### **Working with Local Community Groups and Representatives**

Relevant community groups and associations can be identified with assistance from Council and locally elected representatives and invited to briefing meetings immediately prior to the formal consultation commencing. Whilst not all groups will accept this

offer, a briefing note to assist them in responding to questions from community members may be provided and appreciated.

Engagement prior to the commencement of a formal consultation process can provide additional “buy in” to the consultation process with significant positive outcomes when this information is shared by representatives with community members. When preparing for a sensitive ACIF consultation in NSW, Vodafone provided local council officers and elected members with a Q&A brief on the proposal. This supported the stakeholders in responding to community questions and complaints ensuring the right information was delivered in a timely manner.

Similarly, in instances when the level of community concern has not been anticipated, a suitable responsive action may be to coordinate briefings with community groups, associations and elected representatives. Ensuring ongoing and open communication may assist in balancing the dialogue, however, when Optus submitted three DA’s to a regional council in 2009 and experienced intense community opposition, they recognised that it is much more difficult to reverse negative opinion and opposition when you are coming from a reactive position. This is particularly critical when proposals are subject to development consent by local council.

## **Working with Local Journalists and other Media**

A proactive approach with local journalists and other media is critical in minimising misleading or incorrect information being relayed via local media.

Where high levels of community concern are expected, or local media activity has been experienced, a meeting or media release should be provided immediately prior to the formal consultation commencing to outline the proposal.

## **Optus responds to Invergowrie Tower opponents**

A carrier may also choose to make local headlines as part of a reactive approach where community opposition was not anticipated.

### **Community information sessions**

Where significant levels of community concern are anticipated, a community information session can be planned as part of your community engagement

program, to provide wider access to information and an opportunity for face to face dialogue between community members and carrier representatives.

An easily accessible community venue should be chosen, with feedback on suitable times sought from local representatives to accommodate as many community members as possible. In 2009, Vodafone held a community information session in a public school hall, from 4.30pm to 7.30pm to ensure the session was as inclusive as possible. Communications, project management and technical staff were on hand to answer community questions.

A community information session planned as part of a reactive strategy may also be planned. In any instance, carriers must be prepared to meet and work with objectors who continue to disagree with the proposal, where necessary.



## **Phone tower battle heats up at local meeting**

### **Quick Tips from Lessons Learnt**

Widening communication channels and getting the message out, helps carriers to address fears through increased understanding. This generally results in more neutral media and fewer objections as broader community impacts and benefits are better understood. Telstra were able to counter balance a fear campaign for a DA proposal at a local sporting oval in Victoria in 2009 by providing a reactive communication campaign to the wider community. Ultimately, your investment upfront in a proactive engagement campaign will help to reap rewards with facilities constructed and services delivered with less angst, opposition and delays.

### **Get Your Message Right**

Local communities are sometimes offended when planning regimes create a power imbalance such as the right for carriers to deploy without planning authority approval for ‘low impact facilities’. Consultation efforts by carriers are frequently perceived as non-consultative, not caring and deceitful by community. Unsurprisingly, this can lead to community distrust, negative media, reputation risk and complaints to industry regulators.

### **The challenge of getting your message right**

The regulatory regime for deployment of mobile telecommunications facilities can be confusing for community stakeholders and representatives.

Particularly when exercising their rights under the industry code ACIF C564:2004, carriers are often accused of 'railroading' and 'steam rolling' without regard for community concern.

Designing a proactive and informative engagement program which demonstrates recognition of community interests and willingness to work with local community is all in vain if it is not supported by consistent messaging which outlines the methods of participation and ability of participants to influence decision making.

In accordance with the requirements of the Code, any comments you may have in relation to this proposal should be received by Vodafone/Optus and Telstra no later than **30 June 2009**.

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

Messaging should be simple and include a clear context for the proposal which tells a story. It should explicitly outline the process of consultation with activity deadlines and provide clarity on who the decision maker is and the ability of participants to influence the final outcome.

## Understanding Your Audience

With any communication, the first rule is to always put yourself in the shoes of your audience. Understanding their needs and expectations is crucial to developing relevant and clear communications tools for your community engagement program.

The key is to never assume your audience knows or expects anything. An important message can only be communicated too little, but never too much. Pre-consultation briefings and an understanding of the history of proposals in any local area will assist in building an understanding of your audience. In 2009, Vodafone, Optus and Telstra held pre-ACIF consultation briefings with council officers, Councillors, and elected state and federal members for a multi-carrier proposal which was adjacent to sites where carriers had experienced high levels of community concern and opposition.



These briefings provided the carriers with an opportunity to learn about the uniqueness and identities of this community to best develop the community engagement program.

## Customising Communications

In order to make your communication accessible to all community members, you must focus on using consistent language and terminology that can be understood by everyone. This includes the use of graphics and pictures which are particularly useful when communicating the visual impacts of a proposal.

All communication materials developed should be suitable for use with the general public, however, from time to time; stakeholders with an interest in the technical or scientific nature of the proposal will require detailed and customised responses to their enquiries.

## Keeping Clear on Promises

All outcomes resulting from community feedback must be communicated explicitly, particularly when responding to requests for further investigation or information. For example, community members and a local planning authority felt dissatisfied and disempowered when Vodafone and Optus advised that a number of community suggested sites had been considered and found unsuitable for a proposed multi-carrier site.

For the community and council, the rationale for the carrier's decision lacked clarity and transparency of process, leading to distrust, negative media and complaints to the carrier and Federal regulator. Although the carrier had not broken a promise, they had not communicated explicitly on the role community participants were to play in the remaining consultation and decision making process.

## Phone companies push ahead with antenna plan

### Dialogue is a two way street

Seeking feedback on your consultation is critical in understanding how successful it has been. This is particularly relevant in instances where community feedback is less than expected.

Most importantly, maintaining good relationships means keeping dialogue open after consultation, where possible, to ensure interested and affected parties understand the outcomes of their efforts in the consultation process.

## Quick Tips from Lessons Learnt

Design an inclusive, transparent and thorough engagement plan that anticipates the needs of stakeholders and clearly articulates the rules of engagement. Provide feedback on the outcomes of the consultation to demonstrate how feedback was considered in decision making.

For more information on community consultation, please refer to :

WHO "Establishing a Dialogue on Risks from Electromagnetic Fields" [www.who.int/emf](http://www.who.int/emf)

## National Antenna Database Upgrade

All NSA users can now use a single set of verified antenna patterns for all Carrier and partner Radio Service Operator (RSO) STAD updates and EME assessments. The following is a summary of the outcomes of the NAD Stage 1 project and its integration with the National Site Archive (NSA).

This is a great step forward in ensuring consistency of antenna baseline data.

### **MCF National Antenna Database background**

The National Antenna Database (NAD) is a compiled set of antenna patterns commonly used by the Carriers and Radio Service operators in an open systems format that is readable by any software product. The NAD will be made available to all participating software vendors to ensure consistency of baseline data for EME assessments. The objective of the NAD is to set an industry Baseline for data consistency and to have a single source of verified antenna data.

This approach will:

- Simplify the data management required to ensure EME regulatory compliance
- Remove unnecessary duplication of RF Assessors creating and maintaining their own database of antenna patterns
- Facilitate the update of existing assessments through an open source format that is independent of any on particular site assessment software package.

The MCF has sought the approval of the major antenna vendors to publish their antenna patterns in the NAD for use by the industry in Australia.

### **NAD Implementation – Who does it affect?**

#### **2.1 Carrier & RSO staff, RF Assessors and**

### **Contractors. The NAD was released by the MCF on 2 October 2009**

- RF-Map already uses the NAD
  - Telstra will issue an updated information pack showing how to use the ports & segments function included with the NAD
- The "NAD STAD Integration" is an NSA update which will occur on the weekend of **28<sup>th</sup>/29<sup>th</sup> November 2009** for STAD antenna selection from the NAD lists.

### **Integration with EME prediction software systems**

RF Assessment software vendors will be required to integrate the NAD to their EME software systems to meet the MCF's Data Consistency Baseline.

#### **2.3 NAD antenna additions**

- Adding missing antennas must be done by the MCF NAD Gatekeeper – Radhaz Consulting
- Free field entry of STAD Antenna data is no longer available
- All antenna data entries to NAD done via NAD Gatekeeper at the initiators cost.

#### **What are changes to the NSA?**

The NAD is uploaded to the NSA and is available as a download file for a limited set of users.

#### **NAD STAD Integration (from 30 November 2009)**

- The NAD will be connected to the NSA STAD antenna selections via the addition of new dropdown menu listing antenna types
- Multiband Antenna 'Ports and Segments' must be selected from STAD
- When entering STAD data, you will need to "select" the antenna via the new dropdown menu
  - This automatically selects the correct antenna data from the NAD listings
- A user guide for the NSA STADs and RF Map users will be made available later in November.

Any queries should be directed to the following support groups:

NSA & NAD information –[rfsasupport@amta.org.au](mailto:rfsasupport@amta.org.au)

RF-Map information –[rffmapsupport@radhaz.com.au](mailto:rffmapsupport@radhaz.com.au)

### **Contact details for the MCF**

The MCF office is located in Melbourne at; 119 Ferrars Street, South Melbourne Victoria 3205.

For additional information, please contact us on (03) 9684 3419 or fax us (03) 9684 3434 or email [Helen.greenwood@amta.org.au](mailto:Helen.greenwood@amta.org.au)