

16 March 2012

Committee Secretary  
Senate Standing Committees on Environment and Communications  
PO Box 6100  
Parliament House  
Canberra ACT 2600

Dear Secretary

**Senate Environment and Communications Legislation Committee**

**Inquiry into the *Telecommunications Amendment (Mobile Phone Towers) Bill 2010***

Thank you for the opportunity to make a submission to the Committee's inquiry into the *Telecommunications Amendment (Mobile Phone Towers) Bill 2010* (the Bill).

The Energy Networks Association (ENA) makes this submission in its capacity as the peak body representing Australia's electricity transmission and distribution businesses, and gas distribution businesses.

Radio communications networks are vital to the operation of electricity and gas networks, for applications such as SCADA systems, network protection, remote network monitoring and control, communications to field staff, and communications to customer premises especially for demand management.

The telecommunications networks operated by electricity and gas businesses are generally low powered or located on remote mountain tops with highly directional radiation patterns that are directed towards other communication assets and away from the general public. In addition, the electromagnetic emission levels from these devices are well within the safe limits for exposure to radio frequency emissions, as set out in Australian Radiation Protection and Nuclear Safety Agency's (ARPANSA) Radiation Protection Standard Number 3. Evidence provided in Endeavour Energy's submission to this Inquiry shows that the level of emissions from their devices is less than 0.3 per cent of the safe limits set by ARPANSA.

ENA opposes the proposed Bill on the grounds that its broad scope will have significant unintended consequences for the telecommunications assets operated by electricity and gas network businesses; the concerns underlying the Bill are already addressed through ARPANSA's existing regulatory regime; and the costs of complying with the proposed provisions will be significant, adding upward pressure to electricity bills.

If you have any queries in relation to this submission, or if we can be of any assistance to the Committee please do not hesitate to contact me on 02 6272 1514.

Yours sincerely

Tanya Barden  
**Director**  
**Smart Networks Policy**