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Submission 29 November 2024

Natalie Peters Jones

Digital Inclusion and Deployment Branch

**Re: Proposed Amendments to the Powers and Immunities Framework - Consultation Paper**

The Australian Communications Consumer Action Network (**ACCAN**) thanks the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (**the Department**) for the opportunity to comment on the *Proposed Amendments to the Powers and Immunities Framework - Consultation Paper* (**the Paper**).

ACCAN is the peak national consumer advocacy organisation for communications working to achieve trusted, accessible, inclusive, affordable and available communications and digital services for all Australians.

ACCAN supports the amendments to the to the *Telecommunications (Low-impact Facilities) Determination 2018* and the *Telecommunications Code of Practice 2021*. As the Paper notes, communications are an essential service that Australians rely on to work, study and socialise. In ACCAN’s view the proposed amendments would better allow telecommunications providers to meet the coverage and network resilience needs of the community, particularly in rural areas. The framework maintains the requirements to ensure appropriate consultation with landowners and occupiers while providing them with further flexibility with installation certificates.

We thank the Department for the opportunity to reply to comments on the Paper. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact me at [samuel.kininmonth@accan.org.au](mailto:samuel.kininmonth@accan.org.au).

Yours sincerely

Sam Kininmonth

Senior Policy Adviser

The Australian Communications Consumer Action Network (ACCAN) is Australia’s peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers. ACCAN is committed to reconciliation that acknowledges Australia’s past and values the unique culture and heritage of Aboriginal and Torres Strait Islander peoples. [Read our RAP](https://accan.org.au/about-us/reporting/reconcilitiation-action-plan)