

**RESPONSES TO CONSULTATION ON DRAFT DEPLOYMENT OF RADIOCOMMUNICATION INFRASTRUCTURE
TECHNICAL AND ADMINISTRATIVE STANDARD**

CONTRIBUTORS	RESPONSES	ICTA COMMENTS
Ministry of Environment & Sustainable Development	Agreeable to content of draft standard	No further comments
Ministry of Local Government & Outer Islands		
(a)Municipal Council (MC) of P. Louis	Agreeable. Suggested to work in concert with Ministry of Housing and Lands and come up with comprehensive document for ease of task of local authorities	It has been agreed that the document issued by the Ministry of Housing and lands will cover all structural and environmental aspects of the deployment of radiocommunication infrastructure and that the document of the ICTA will cover aspects related to EMF safety.
(b) MC of B. Bassin/R. Hill	Agreeable to content of draft standard	No further comments
(c)MC of Q. Bornes	Suggested that the following be considered before finalising document <ol style="list-style-type: none"> 1. To include more information pertaining to health & safety risks associated with Electromagnetic Fields (EMF) and on how to mitigate same 2. Operator to obtain ICTA clearance before application for BLP 	<ol style="list-style-type: none"> 1. It is believed that it is outside the scope of this standard to provide information on health and safety risks associated with EMF, however, the precautionary approach on which the document is based provides the means of mitigating any risks associated with EMF exposure; 2. section 6.3.7 of the

		document specifies that the Local authority may consult the ICTA prior to determining an application for BLP.
(d) MC of Vacoas Phoenix	Referred to a meeting held on 24.08.10 at the Ministry of Housing and Lands where it was agreed that recommendations of ICTA be incorporated in Planning Policy Guidance (PPG)	See response of Ministry of Housing and Lands later below
(e) MC of Curepipe	No additional information submitted which is relevant to subject.	No further comments
(f) District Council (DC) of Pamplemousses/ R. Du Rempart	To consult stakeholders prior to construction of radiocommunication infrastructures. To seek the views of concerned local authority, with full technical details for each site	No further comments
(g) DC of Moka/Flacq	To recommend this standard to the Ministry of Housing and Lands for incorporation in their PPG	See response of Ministry of Housing below
(h) DC of G. Port/Savanne	Agreeable. Recommend that a monitoring program be set up at the ICTA once standard is released	Good note taken
(i) DC of B. River	Agreeable to content of draft standard	No further comments
Ministry of Housing & Lands	Issue of site selection is common to both ICTA standard & PPG. Both docs complement each other restricting to their own domains. No conflicting terms or duplication issues. No objection to proposed standard	No further comments
Ministry of ICT (CIB)	<ul style="list-style-type: none"> – Believes that licensee should be “legally” obliged to take all precautionary measures – Proposes to consider including “human safety aspect” in title of document – Para 5.2(e) replace “engaging” by a term which asserts role of ICTA in co-location. This may minimize set up of infrastructure by operators => reduce costs & safety hazards – Para 6.1.4 consider including condition on acceptable noise level generated by radiocom infrastructure – Para 6.4.2 ICTA should ensure that operation of radiocommunication infrastructure by operators are as per norms 	Comments and suggestions noted and incorporated in document where applicable.

	<ul style="list-style-type: none"> – Para 6.4.4 licensee should also , with ICTA, sensitise public on health hazards – Para 6.5 suggest that doc evidence of compliance to std be maintained for longer period, if not at all times – Para 7.3.3 Suggest add “with consent of ICTA” to sentence – Para 8.2.1 Suggest add “approved by ICTA” after the word ‘procedure’ – Para 8.3 suggest desirable that ICTA be informed/ involved since beginning 	
MTML	Restriction on new towers will make new operators compete in non-level playing field.	<p>This standard provides a benchmark to all operators in the process of site selection, base station construction and operation and is indeed applicable to all new sites. This is an issue which goes beyond competition as it deals primarily with public health and safety. Moreover, ICTA does not see how this distorts the level playing field given that the standard provides operators with a tool that has as its main objective to facilitate the deployment of radiocommunication infrastructure whilst adopting a precautionary approach to the said deployment. It is a fact that new operators may have to deal with issues that were not present</p>

		when incumbent operators were deploying their networks. Having said so the standard highly encourages co-location of sites where same is reasonable and technically feasible.
Mauritius Telecom	<ul style="list-style-type: none"> - Precautionary measures are excessive – will adversely affect site acquisition & service quality. - No need presently to raise concern of public on such issues presently, rather public to be notified that no proof yet has been obtained regarding health hazards of base stations. - Adequate information is already being submitted to local authorities and ICTA, under existing legislations, & should be sufficient to comfort public on RF safety. - MT has then taken each clause and given its views. - These essentially pertain to the fact that changes to current procedures will require additional resources and financing (passed onto customers). - MT agreeable to collocation of sites, subject to market forces. - MT cites licence obligations to improve coverage and this could be an administrative tumbling block. 	ICTA is of the view that the precautionary measures being adopted are already in existence in other countries and are not excessive. Operators should not view the standards as a barrier to the deployment of radiocommunication infrastructure but rather as a tool that will facilitate the deployment of same whilst taking into account the qualms raised by the general public and by applying a precautionary approach to the said deployment.
Emtel	<ol style="list-style-type: none"> 1. Requested to strike the right balance between operators' obligation to provide good coverage and the application of the precautionary approach. Noted that telecommunication facilities should be situated near to end-users to ensure better service. 2. Additional cost will be incurred through the application of the standard 	<ol style="list-style-type: none"> 1. Refer to comments above 2. Any additional cost incurred is believed to be for

	<ol style="list-style-type: none"> 3. Standard must have no retroactive effect and shall only apply to future sites and equipment 4. Requested that the timeframe for implementation be agreed between stakeholders and suggested a six months transitional period 5. Need to educate people 6. Requested concerted and coordinated actions among the different Authorities. 	<p>the good of the society at large and should be part of the operators' corporate social responsibility.</p> <ol style="list-style-type: none"> 3. Standard shall apply to future infrastructure only even if operators shall ensure that their current base stations are operating within the required norms as per the terms of their licence 4. Noted 5. Noted 6. Noted
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