

Mobile Operators' progress on the Deloitte & Touche Implementation Review Recommendations



June 2004

Background

Deloitte & Touche were commissioned by the MOA to conduct an independent review of the operators' implementation of the Ten Commitments during the first year of operation (1st September 2001 to 31st August 2002). In their report, dated 9th July 2003, Deloitte & Touche confirmed they had found evidence supporting the operators' assertion of demonstrable progress in the implementation of the Ten Commitments. The review also made a number of recommendations for improvement.

Within a few days of receiving the report, the MOA placed it in the public domain and released a response that accepted all the recommendations and set out actions to address the points raised. The recommendations and planned responses were discussed at a Stakeholder Roundtable meeting a few weeks later attended by local authorities, citizens' groups, industry and government.

This paper documents the progress made by the operators' and the MOA in acting upon those recommendations, the industry response and the comments made at the Stakeholder Roundtable meeting.

Progress

Of the 46 recommendations in the Deloitte & Touche report, all have been addressed and 43 have been completed.

All the actions that relate to clarification and reinforcement of the operators' implementation of the Ten Commitments have been addressed, largely through updated documentation and briefing sessions for their staff and their site acquisition agents.

The remaining 3 recommendations are in train as small projects and are expected to be completed by the end of 2004. These are:

- Review of the Code of Best Practice with the ODPM
- Review of the sensitivity of the Traffic Light Model
- Review of the distribution of site share statistics to a wider audience

The following pages describe the specific actions undertaken for each of the Deloitte & Touche recommendations.

Recommendation 1 (Report page 12):

“The overall recommendation is that a concerted effort is required to ensure that the Commitments and especially the planning commitments are applied fully. As part of this effort it may be worth reviewing the Commitments and the guidelines to implementation themselves to ensure that they are what the various stakeholders really want.”

Industry Response:

“Accepted, the operators are committed to delivering improved communication and consultation with local authorities and the public. They will reinforce to their site acquisition agents the need to apply best practice in their consultation with local planning authorities and communities. The Ten Commitments’ planning and consultation aspects are now contained in the Code of Best Practice on Mobile Phone Network Development published by the Office of the Deputy Prime Minister (ODPM) in November 2002 (“Code of Best Practice”). The Code of Best Practice and its operation are to be reviewed by a working group established by the ODPM and the operators will have regard to this in reviewing the Ten Commitments against the requirements of the various stakeholder groups.”

Actions undertaken:

- The recommendations from the Report and the industry responses were discussed with representative stakeholders at a Roundtable meeting in September 2003.
- The Operators sent a package of updates containing new best practice guides and revised instructions resulting from the Deloitte & Touche recommendation to their agents in December 2003.
- This was reinforced by a series of 5 regional seminars delivered by the MOA and the mobile operators in the first quarter of 2004. A generic copy of the material presented (Regional Site Acquisition Agent Seminar) is available on the MOA website at http://www.mobilemastinfo.com/planning/best_practice.htm
- A review of the Code of Best Practice has been agreed with the ODPM and will commence shortly.

Status:

Complete.

Recommendation 2 (Report page 15):

“Consider sending maps of sites to the LPAs which are not marked “commercial in confidence” to allow Planning Officers to assist in identifying potential site share opportunities within their area.”

Industry Response:

“Accepted, and already implemented. Those maps issued to LPAs in October 2002 are in the public domain.”

Actions undertaken:

- Rollout plans sent in October 2003 continue to be not marked “commercial in confidence”.

Status:
Complete.

Recommendation 3 (Report page 15):

“Continue to offer Annual Review meetings with the LPA and consider offering joint Operator meetings to facilitate Local Planning Officers’ understanding of the potential impact of the Operators’ plans in their areas.”

Industry Response:

“Accepted, the operators will continue to offer meetings on their annual rollout plans which are sent to all local planning authorities each autumn. In 2001 approximately 15% of planners accepted the offer of a meeting and in 2002 approximately 10%. The operators will encourage ODPM and LPAs to work to ensure higher take up by Planning Officers.”

Actions undertaken:

- Rollout plans sent in October 2003 continue to include an offer of a meeting to the LPA.
- Through its ongoing actions against Commitment 4, the MOA is continuing to raise awareness within LPAs of the benefits of Annual Review meetings with the Operators.
- The MOA has also asked ODPM to encourage LPAs to take up offers of Annual Review meetings.

Status:
Complete.

Recommendation 4 (Report page 15):

“Request feedback from Local Planning Officers on the annual and pre-roll out Consultations and address their concerns regarding effectiveness and usefulness of the information provided.”

Industry Response:

“Accepted, the operators will continue to ask for feedback on their annual rollout plans which are sent to all local planning authorities each autumn. The operators will also seek to agree, in conjunction with the LGA, improvements to the format (e.g. e-copy) in which the information is provided to LPAs.”

Actions undertaken:

- A number of LPAs have responded to the request for feedback on format, included with the October 2003 rollout plans.
- Provision of annual and pre-rollout information is now embodied in the Code of Best Practice. Feedback from LPAs on the effectiveness and usefulness of the information provided should be part of the forthcoming ODPM review of the Code.
- Discussions have commenced with ODPM on possible use of the ‘Planning Portal’ as a mechanism for distributing future rollout plans.

Status:
Complete.

Recommendation 5 (Report page 15):

“Tie individual applications in to the annual/pre-roll out consultation information to allow Local Planning Officers to understand their context.”

Industry Response:

“Accepted, already implemented in the Code of Best Practice and the operators will remind site acquisition agents that they should refer Local Planning Officers to annual roll out plans or pre-roll out plans.”

Actions undertaken:

- Reminder to refer LPAs to annual roll-out and pre roll-out plans included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:
Complete.

Recommendation 6 (Report page 16):

“Consider working with Local Planning Officers to address their concerns regarding their lack of technical expertise which prevents them from understanding the information provided to them as part of the annual and pre-roll out consultation process.”

Industry Response:

“Accepted, the operators are willing to assist planners to improve their technical expertise at either technical workshops (Commitment 4) or on a case-by-case basis. This is best achieved when the LPA has a dedicated Telecommunications officer.”

Actions undertaken:

- Through its ongoing actions against Commitment 4, the MOA is continuing to assist planners and others within LPAs to improve their technical expertise in mobile communications network rollout.
- A list of the councils where Commitment 4 workshops have been held is maintained on the MOA website at www.mobilemastinfo.com/planning/mast_briefing.htm

Status:
Complete.

Recommendation 7 (Report page 20):

“Reiterate to Agents the need to maintain clear records of the potential sites identified in the search area and the reasons for choosing and proceeding with particular sites especially where they have been allocated a Red or Amber Traffic Light Rating.”

Industry Response:

“Accepted, the operators will reiterate to their site acquisition agents the importance of keeping good records for all the stages of the site selection and pre-application consultation process.”

Actions undertaken:

- Reminder to keep good records of reasons for choosing particular sites included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:

Complete.

Recommendation 8 (Report page 20):

“Consider providing clear explanations (both technical and non-technical) for proceeding with alternative and/or suggested sites in planning applications.”

Industry Response:

“Accepted, the operators will reinforce to their site acquisition agents that they must provide planners with clear explanations (both technical and non-technical) as to why alternative sites are not proceeded with. The Code of Best Practice Supplementary Information Template has a section dealing with alternative sites.”

Actions undertaken:

- Reminder to provide reasoned and adequate explanations of alternative sites included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:

Complete.

Recommendation 9 (Report page 21):

“Reinforce the use of the MOA standard Traffic Light Model for all potential sites to ensure all sites are consulted on using the consistent criteria.”

Industry Response:

“Accepted, the operators will reinforce to their site acquisition agents that they must use the MOA standard Traffic Light Model for all potential sites. This is already contained in their contractual conditions of engagement. The MOA website now contains all the latest versions of the documents.”

Actions undertaken:

- An industry standard form for recording the Traffic Light Rating has been adopted by the operators to ensure consistency.
- Reminder to use the standard Traffic Light Model and above form included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:
Complete.

Recommendation 10 (Report page 21):

“Clarify that the Traffic Light Model does not apply to temporary sites.”

Industry Response:

“Accepted, the Traffic Light Model does not apply to temporary sites. This is the understanding of the operators, but it is accepted that it was not stated within the Model. This will be rectified.”

Output from Stakeholder Meeting:

“Should an operator be considering seeking to turn a temporary site into a permanent site, such a site would go through the traffic light rating process.”

Actions undertaken:

- MOA clarified application of Traffic Light Model to temporary sites on page 2 of the Site Selection & Planning Model available via the MOA website at http://www.mobilemastinfo.com/planning/best_practice.htm
- This clarification was included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:
Complete.

Recommendation 11 (Report page 21):

“Consider performing sensitivity tests on the Traffic Light Model’s scoring system to help in refining the guidelines for rating sites. The current Traffic Light Model guidelines are subjective can be interpreted in a variety of ways, which may result in sites being under-rated.”

Industry Response:

“Accepted, the operators introduced the Traffic Light Model to add objectivity to the consultation process but recognise that the system is inherently subjective. However, the process should involve input from LPAs in order to make it more objective. The operators will perform sensitivity tests on a sample of sites over the next year to see if the current Traffic Light Model guidelines can be refined.”

Actions undertaken:

- The objectives and form of sensitivity tests have been discussed and agreed by the MOA and the Operators.
- A project has been initiated to test the sensitivity of a sample of sites during 2004.

Status:
Commenced. Will be concluded as part of ongoing business of the MOA.

Recommendation 12 (Report page 22):

“Require Agents to formally document discussions with Planning Officers regarding Consultation Strategy. The agreed Consultation Strategy should be formally recorded and its implementation documented on file.”

Industry Response:

“Accepted, the operators will remind their site acquisition agents of the need for good record keeping of the consultation strategy discussions and the consultation strategy adopted. Annex F, Section 2 of the Code of Best Practice provides for a record to be made of consultation carried out, with or without LPA agreement, and submitted with each planning application/notification.”

Output from Stakeholder Meeting:

“Officers need to be aware of when and what pre-application consultation is being carried out.”

Actions undertaken:

- An industry standard form for recording Consultation Plans has been adopted by the operators to ensure consistency.
- Reminder to record consultation plans, consultation actions undertaken and to keep those involved informed was included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:

Complete.

Recommendation 13 (Report page 22):

“Clarify the wording of the Site Selection and Planning Model as not all consultation strategies will be agreed by all stakeholders.”

Industry Response:

“Accepted, the operators will clarify the wording of the Site Selection and Planning Model accordingly.”

Actions undertaken:

- Clarifications on agreement of consultation plans have been added to the Site Selection and Planning Model available via the MOA website at http://www.mobilemastinfo.com/planning/best_practice.htm
- References to these clarifications were included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:

Complete.

Recommendation 14 (Report page 23):

“Continue to offer Local Planning Officers pre-application meetings for all sites, regardless of the history of response from specific LPAs.”

Industry Response:

“Accepted, Annex F, Section 2 of the Code of Best Practice requires this to be recorded. The operators will remind their site acquisition agents that they should continue to ask for meetings even if the planning authority has refused such discussions in the past. Operators recognise that planners have many demands on their time but regard the advice that they can give to agents at this pre-application stage as essential.”

Actions undertaken:

- Reminder to continue to offer meetings to Planning Officers was included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:

Complete.

Recommendation 15 (Report page 23):

“Contact Planning Officers by telephone, email, fax or correspondence as alternatives to pre-application meetings to allow their feedback and participation in the pre-application consultation process –perhaps agree preferred mechanism with individual officers.”

Industry Response:

“Accepted, the operators will direct their site acquisition agents to be flexible in the format of such discussions.”

Output from Stakeholder Meeting:

“Operators are reassessing the way in which regarding the view of planning officers is recorded during the pre-application stage.”

Actions undertaken:

- Clarification of the term ‘Meeting with LPA Case Officer’ has been added to the Site Selection and Planning Model available via the MOA website at http://www.mobilemastinfo.com/planning/best_practice.htm
- This clarification was included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:

Complete.

Recommendation 16 (Report page 23):

“Reiterate to Agents the need for all information on any pre-application consultation, which has taken place, on potential site share options and/or within the relevant search areas to be forwarded to the relevant Outgoing site share Agent.”

Industry Response:

“Accepted, the new site sharing arrangements which the operators put in place in 2001/2 include information transfer where both outgoing and incoming agents act in the stages of pre-application work.”

Output from Stakeholder Meeting:

“Ensure that the reasoning process that has taken place in reaching a proposed site is visible and transparent.”

Actions undertaken:

- The information to be transferred between operators in a site share situation has been agreed by all operators and included in their internal procedures.

Status:

Complete.

Recommendation 17 (Report page 23):

“Consider providing Planning Officers with drawings of the potential sites at an early stage to facilitate the Planning Officers’ assessment of the potential impact of a site in an area.”

Industry Response:

“Accepted, the operators will encourage their site acquisition agents to provide drawings for any pre-application discussions with planners.”

Actions undertaken:

- The option to provide ‘generic’ drawings or photomontages was included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:

Complete.

Recommendation 18 (Report page 23):

“Ensure that sufficient time is provided to the Planning Officers to review these drawings. The definition of “sufficient time” should be agreed between the Operators and the Planning Officers.”

Industry Response:

“Accepted, the operators currently allocate two weeks for Planning Officers to review and respond to drawings. The operators will encourage their site acquisition agents to discuss with Planning Officers on a case-by-case basis what time is needed, within the Government’s best practice targets.”

Actions undertaken:

- The requirement to discuss with Planning Officers what time is needed to review drawings was included in the ‘update package’ described under Recommendation 1 above.

Status:
Complete.

Recommendation 19 (Report page 23):

“Reiterate the use of the Consultation Plan to record the views of the Planning Officers during the pre-application consultation stage.”

Industry Response:

“Accepted, the operators will reiterate to their site acquisition agents the need for good record keeping of the views of Planning Officers. The Supplementary Information Template to be submitted with each application has a section to record the outcome of discussions with the LPA.”

Actions undertaken:

- Clarification that the views of the Planning Officer should be recorded on file, but not in the Consultation Plan has been added to the Site Selection & Planning Model available via the MOA website at http://www.mobilemastinfo.com/planning/best_practice.htm
- Reminder to record discussions with Planning Officers was included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:
Complete.

Recommendation 20 (Report page 24):

“Re-iterate to Agents the need to record the TLM rating and re-appraise it for all potential sites until the preferred option is identified. Agents should be encouraged to retain all documentation relating to the potential options and TLM ratings of sites.”

Industry Response:

“Accepted, the operators will reinforce to their site acquisition agents the need for good record keeping of potential sites considered – (Annex F, Section 6 of the Code of Best Practice refers).”

Actions undertaken:

- An industry standard form for recording the Traffic Light Rating has been adopted by the operators described under Recommendation 9 above.
- Reminder to record and review TLRs included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:
Complete.

Recommendation 21 (Report page 24):

“Clarify intent to all stakeholders regarding the purpose of the Traffic Light Rating. Community representatives and National Pressure Group, currently interpret Red/Amber ratings as meaning alternative sites should be found, however, the current wording of the model indicates that only more consultation is needed.”

Industry Response:

“Accepted, it is clear from the Ten Commitments and the Code of Best Practice that the Traffic Light Rating is designed to identify how much additional pre- application consultation is necessary for a proposed site.”

Output from Stakeholder Meeting:

“Clarify to stakeholders the purpose of the traffic light rating. This forms a key part of Commitment 4 - workshops for councils.”

Actions undertaken:

- Clarification of the meaning and purpose of the traffic light rating model has been added to the Guide to using the Traffic Light Model available via the MOA website at http://www.mobilemastinfo.com/planning/best_practice.htm
- This clarification was included in the ‘update package’ and seminars described under Recommendation 1 above.
- The meaning and purpose of the Traffic Light Rating is also key element of the Commitment 4 presentations.

Status:

Complete.

Recommendation 22 (Report page 25):

“Consider providing Planning Officers with photomontages of the site options and preferred site as well as or as an alternative to the tour of options.”

Industry Response:

“Accepted, the operators will provide photomontages for viable site options if requested by planning officers.”

Actions undertaken:

- The option to provide photomontages for preferred sites was included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:

Complete.

Recommendation 23 (Report page 25):

“Train Agents in consultation strategies and clarify when to initiate them. This training should reinforce that consultation is a two-way dialogue and that community response must be seen to be taken into consideration.”

Industry Response:

“Accepted, the operators will make it clear to their site acquisition agents and, where appropriate, to in-house community liaison staff the need for best practice in their consultation with communities and offer feedback on how the community response has been implemented.”

Output from Stakeholder Meeting:

“Operators already carry out their own training programmes with their agents but there will be consideration of additional training requirements.”

Actions undertaken:

- The MOA and Operators have made a best practice consultation guide – The Risk Communication Handbook – available to their site acquisition agents via the MOA website at www.mobilemastinfo.com/planning/handbook.htm
- The need for two-way dialogue and the availability of the Risk Communication Handbook was included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:

Complete.

Recommendation 24 (Report page 26):

“Consider reviewing and linking to the implementation of the Ten Commitments the Agents’ remuneration.”

Industry Response:

“Accepted, the operators’ terms and conditions require site acquisition agents to follow the Ten Commitments. The operators will confirm this requirement to their site acquisition agents.”

Actions undertaken:

- The operators confirm that implementation of the Ten Commitments is included in the terms and conditions for site acquisition agents.

Status:

Complete.

Recommendation 25 (Report page 26):

“Reiterate the need for Ward Councils and Parish Council clerks to receive consultation letters for all Amber/Red sites unless otherwise advised by the LPA.”

Industry Response:

“Accepted, the operators will reiterate to their site acquisition agents the need to comply with the Essential steps of the Site Selection and Planning Model and, if the LPA requests no consultation, this should be recorded on file.”

Actions undertaken:

- The requirement to follow the Site Selection and Planning Model and to record the views of the LPA was included in the ‘update package’ and seminars described under Recommendation 1 above.
- Guidance is also included in the Risk Communication Handbook described under Recommendation 23 above.

Status:

Complete.

Recommendation 26 (Report page 26):

“Provide clear guidelines to Agents as to whom is expected to be consulted for all sites.”

Industry Response:

“Accepted, the operators believe that the Site Selection and Planning Model gives clear guidelines on whom to consult.”

Actions undertaken:

- Guidance on best practice consultation was included in the ‘update package’ and seminars described under Recommendation 1 above.
- This is also included in the Risk Communication Handbook described under Recommendation 23 above

Status:

Complete.

Recommendation 27 (Report page 26):

“Encourage Agents to obtain and use local contact details of community representatives where available.”

Industry Response:

“Accepted, the operators will reiterate to their site acquisition agents the need for best practice in their consultation with communities.”

Actions undertaken:

- The requirement to obtain contact details of local community representatives was included in the ‘update package’ and seminars described under Recommendation 1 above.
- This is also included in the Risk Communication Handbook described under Recommendation 23 above.

Status:

Complete.

Recommendation 28 (Report page 26):

“Ensure Agents employ consultation strategies that go beyond merely informing community representatives of intended plans and that when feedback is received it is reflected in future plans and activities.”

Industry Response:

“Accepted, the operators will remind their site acquisition agents of the need to consider feedback from community representatives in future plans and activities.”

Actions undertaken:

- The requirement to take feedback from local community representatives into consideration was included in the ‘update package’ and seminars described under Recommendation 1 above.
- This is also included in the Risk Communication Handbook described under Recommendation 23 above.

Status:

Complete.

Recommendation 29 (Report page 26):

“Maintain evidence of any site notices erected in site files.”

Industry Response:

“Accepted, the operators will reinforce to their site acquisition agents the need for good record keeping of any additional optional consultation activities, including voluntary site notices.”

Actions undertaken:

- The requirement to record all consultation activities was included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:

Complete.

Recommendation 30 (Report page 27):

“Ensure all drop in sessions are published on a wider basis to allow communities to take advantage of them.”

Industry Response:

“Accepted, the operators will remind their site acquisition agents of the need for best practice in their consultation with communities.”

Actions undertaken:

- The requirement for best practice consultation was included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:
Complete.

Recommendation 31 (Report page 27):

“Ensure all stakeholder briefing sessions are publicised on a wider basis to allow interested stakeholders to participate in them.”

Industry Response:

“Accepted, the operators will reinforce to their site acquisition agents the need for best practice in their consultation with communities including the need to identify key stakeholders and target invitations to a full cross section of community representatives.”

Actions undertaken:

- The requirement for best practice in targeting consultation with communities was included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:
Complete.

Recommendation 32 (Report page 27):

“Maintain evidence of any leaflets provided to communities on site files.”

Industry Response:

“Accepted, the operators will remind their site acquisition agents of the need for good record keeping of the leaflets they may have provided to communities.”

Actions undertaken:

- The requirement to record all consultation activities was included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:
Complete.

Recommendation 33 (Report page 27):

“Consideration should be given to increasing the use of the local press as a method of communicating Operator site plans to local communities.”

Industry Response:

“Accepted, the operators will consider the merits of using the local press to a greater extent in consultation with site acquisition agents and local planning officers on a case-by-case basis.”

Actions undertaken:

- A reminder to consider use of local press was included in the ‘update package’ and seminars described under Recommendation 1 above.
- The Risk Communication Handbook also offers guidance on the merits of using the local press.

Status:

Complete.

Recommendation 34 (Report page 28):

“Reiterate to all parties the need to retain complete documentation on site files detailing all contact made, and the outcome of any contact, with LPAs and community groups. Without complete documentation on files it is not possible to ascertain a full picture of the consultation performed.”

Industry Response:

“Accepted, the operators agree that good record keeping is an essential part of the transparency of the network rollout process. While some information about the consultation carried out will be on the files of the operators’ Community Liaison Officers (which were not reviewed by Deloitte & Touche), acquisition agents’ files should have some record of these activities.”

Actions undertaken:

- The requirement to record all consultation was included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:

Complete.

Recommendation 35 (Report page 28):

“Consider developing additional supporting training and tools to Agents to facilitate and support them in implementing the Ten Commitments.”

Industry Response:

“Accepted, the operators have introduced supporting training and tools and will consider developing additional supporting material for site acquisition agents to assist them in using best practice in community consultation.”

Actions undertaken:

- The MOA and Operators have made a best practice consultation guide – The Risk Communication Handbook – available to their site acquisition agents as described under Recommendation 23 above.
- The availability of the Risk Communication Handbook was included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:

Complete.

Recommendation 36 (Report page 31):

“Consider including the additional information detailed as the good practices for each planning type in the appropriate standard information provided for all applications.”

Industry Response:

“Accepted, the operators will continue to provide the additional material as required by the Code of Best Practice.”

Actions undertaken:

- Covered by the Code of Best Practice, no further action required.

Status:

Complete.

Recommendation 37 (Report page 31):

“Provide Planning Officers with supporting information for Licence notifications submitted.”

Industry Response:

“Accepted, the operators will provide the additional material as required by the Code of Best Practice.”

Actions undertaken:

- Covered by the Code of Best Practice, no further action required.

Status:

Complete.

Recommendation 38 (Report page 42):

“It is recommended that criteria are published that will allow Local Planning Officers, Agents and interested stakeholders to understand the technical and commercial decision making criteria upon which sites can or cannot be shared.”

Industry Response:

“Accepted, the operators will include the information in the standard Supplementary Information Template supplied. Annex F, Section 6 of the Code of Best Practice provides for information to be submitted for all sites considered and not chosen.”

Actions undertaken:

- Site sharing criteria are on a site-by-site basis. The requirement to include site sharing considerations in the Supplementary Information Template was included in the ‘update package’ and seminars described under Recommendation 1 above.

Status:

Complete.

Recommendation 39 (Report page 43):

“Consider publishing the site share information to a wider group of stakeholders rather than just the government bodies listed.”

Industry Response:

“Accepted, the operators will consult with third party site providers on this recommendation.”

Actions undertaken:

- Consultation with third party site providers has been carried out.
- Work is underway to review the format of the statistics.

Status:

Commenced. Will be concluded as part of ongoing business of the MOA.

Recommendation 40 (Report page 45):

“Consideration should be given to assessing whether given changes in the market, perception of risk and/or in regulation renewed effort is required to change the agenda/contents or invitation list whether the key targets have attended across the four regions of the UK.”

Industry Response:

“Accepted. Local Authorities have responded very positively to the programme of MOA workshops and there is continuing demand for them. A member of staff has been recruited to MOA to act as a Council Liaison Officer to facilitate and develop this successful Commitment. Operators also attend meetings with councils where the presentation content is tailored to suit local priorities.”

Actions undertaken:

- The MOA continues to be committed to providing workshops as part of Commitment 4, and has recently revised the content to ensure they are current and relevant to attendees.
- The MOA respond positively to every request from LPAs and seek to proactively contact LPAs to arrange further workshops.

Status:

Complete.

The following 5 recommendations relate to Commitment 5 – The database of information available to the public on radio base stations. The actions detailed below have been agreed between the MOA and Ofcom (formerly the Radiocommunications Agency). Implementation of the actions has been carried out largely by Ofcom. All actions are complete.

Recommendations 41 to 45 (Report page 46):

“Consideration should be given to:

- Assessing the need for a validation process of the data (currently the Operators submit information and it is entered onto the database by the RadioCommunications Agency).*
- Developing a feedback process so that when errors are found by users of the database they can be addressed.*
- Addressing feedback we received that requests for information logged on the web site are not replied to by the Operators.*
- Applying national grid reference locations to the sites so that local planning officers and other parties can relate the data to standardised GIS data.*
- Using a nomenclature system for the sites that does not reset every three months when the database is updated (the National Grid Reference could be used for this).”*

Industry Response:

“Accepted, the operators will bring these recommendations to the attention of the Radiocommunications Agency which owns and controls the database. The operators have regular liaison meetings with the RA to discuss the website. The information on sites is updated quarterly by the operators. A new nomenclature system has been introduced which does not reset each quarter and the operators’ cell identification reference is used for this purpose.”

Recommendation 41:

- Assessing the need for a validation process of the data (currently the Operators submit information and it is entered onto the database by the RadioCommunications Agency).*

Action undertaken:

- Ofcom have introduced a Managed Spreadsheet so the operators can test the input data against reasonable assumptions before the data is input into Sitefinder. Any errors or inconsistencies in the data are thus highlighted to the operators and can be corrected before the data is passed to Ofcom

Recommendation 42:

- Developing a feedback process so that when errors are found by users of the database they can be addressed.*

Action undertaken:

- A feedback process exists. Users can use the Sitefinder Email facility to send an Email directly to an operator or to Ofcom advising of an error or omission in the data. These errors or omissions are corrected, by the operators, when the data is next input into Sitefinder

Recommendation 43:

- Addressing feedback we received that requests for information logged on the web site are not replied to by the Operators.*

Action undertaken:

- Users can use the Sitefinder Email facility to send an Email enquiry directly to an operator or to Ofcom. Each operator and Ofcom keep records of all Email messages. The operators and Ofcom produce a monthly summary of requests for information and their 'response' performance.

Recommendation 44:

- *Applying national grid reference locations to the sites so that local planning officers and other parties can relate the data to standardised GIS data.*

Action undertaken:

- The Sitefinder database was not set up to enable local planning officers to make base station siting enquiries. The operators provide base station siting data separately and in much more detail directly to every LPA in the UK.

Recommendation 45:

- *Using a nomenclature system for the sites that does not reset every three months when the database is updated.*

Action undertaken:

- The nomenclature system for sites has now been amended so that the operators' site reference is used as an unchanging reference. This site reference is now stable from quarter to quarter

Recommendation 46 (Report page 47):

“Consider the need for the ‘specific’ requirement in the Ten Commitments as nominated specific staff resources does not appear to be how community representatives liaise with the Operators.”

Industry Response:

“All operators have appointed community liaison staff to deal with public complaints and enquiries. They will call on other resources within the operators and may, depending on the nature of the enquiry, ask specialist technical staff to respond directly to public enquiries. Each operator has a dedicated phone number and e-mail address for public enquiries and the appropriate community liaison officer will then respond to the enquirer.”

Actions undertaken:

- No further action required.

Status:

Complete.