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Dear Australian Communications and Media Authority,

I would like to take the opportunity of the Consultation for the proposal to remake the Telecommunications (Types of Cabling Work) Declaration 2013 to make a further suggestion (in addition to the longer submission I have already made.)

The Telecommunications (Types of Cabling Work) Declaration is a legal document associated with a very long and complex legal document (the Telecommunications Act 1997). Both of these documents are too difficult for most ordinary people to refer to, nor would most ordinary people be aware of these documents.

Even we in larger organisations, which may have a person who specifically manages the organisation's customer cabling, may have trouble determining what cabling work may be done by an ordinary person, what cabling work must be done by a registered cabler with a particular type of registration (e.g. restricted or open, and which specialist competencies), and what cabling work does not fall under the Act at all.

The situation is further complicated by confusion among tradespeople about these matters. The less the cabling is like computer network cabling, the more confusion there appears to be.

It would be of assistance to institutions if online documentation could be made available by the ACMA showing the commonest cabling situations and who needs to perform the cabling work for them.

As an example, I attach an inquiry that I made to the ACMA in 2021. (I received a helpful reply from ACMA staff, which I have not reproduced here.)

Dear ACMA,

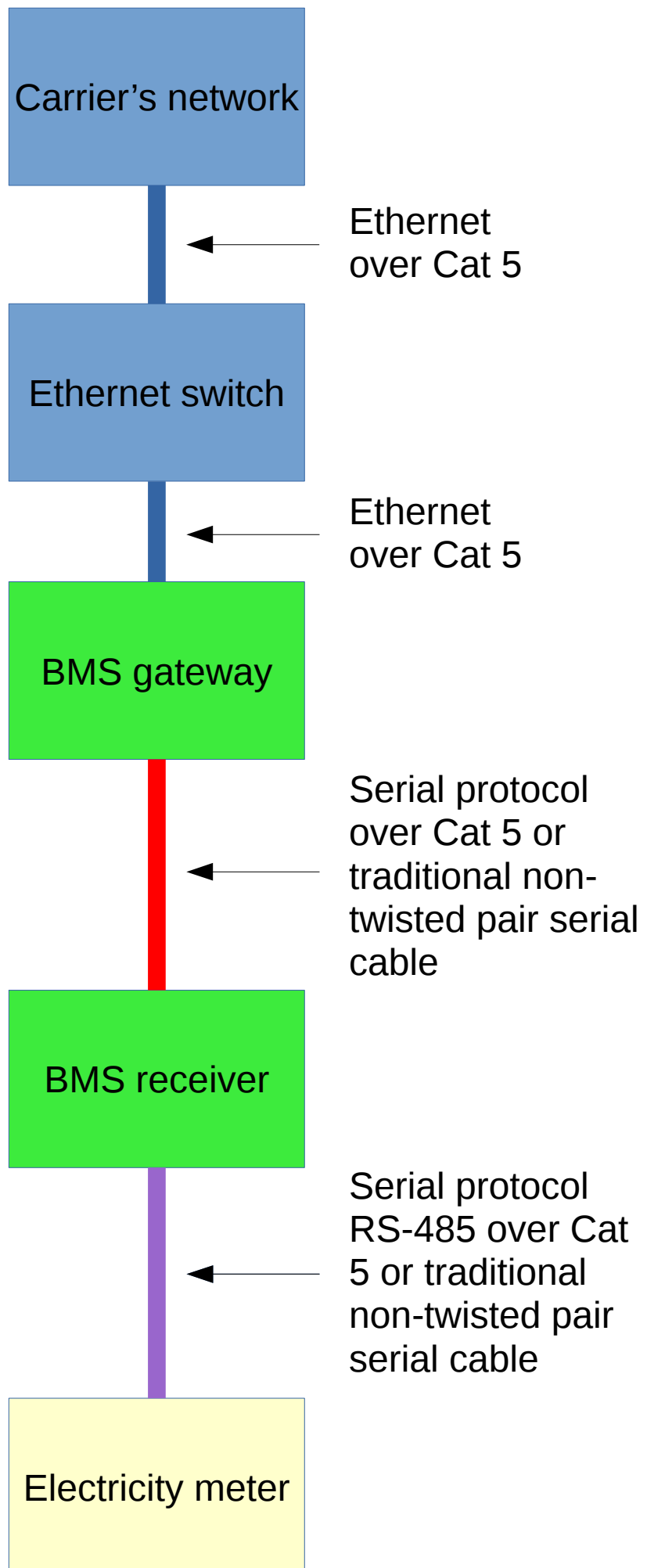
I know that customer cabling begins at the Network Boundary, but I am not always sure where it ends.

Could you please refer to my attached drawing showing BMS equipment that is used to read an electricity meter.

I know that the two blue lines are customer cabling. Is the red line also customer cabling? Is the purple line also customer cabling?

Thanks,

jen.



Having an online resource, with diagrams and photographs of common situations, would make it easier to spread correct information to sectors of industry which are currently confused.

It would also make it easier to advise the construction industry. I find it quite difficult to convince builders that certain equipment technicians need to be registered cabling; understandably, builders tend to believe the subcontractors rather than me. An official government website with specific relevant content is likely to help me to be believed more often.

If a project is created to produce such an online resource, I would be happy to contribute some diagram sketches and photographs. I presume there would be industry bodies which would also be willing to help.

Such a resource might also be useful to the ACMA when responding to inquiries about cabling, and might even reduce the number of inquiries received.

No-one would expect all possible cabling situations to be covered. However, just covering the most common ones would still be worthwhile. For example, I imagine many commercial buildings would have situations similar to my inquiry above.

Yours faithfully,

Jennifer Sayers