

11 December 2023



Dominic Byrne

Manager
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Australian Communications and Media Authority

Email: Dominic.Byrne@acma.gov.au

Dear Dominic,

RE: Proposal to remake the Telecommunications (Types of Cabling Work) Declaration 2013

Communications Alliance welcomes the opportunity to provide comments on the ACMA's *Proposal to remake the Telecommunications (Types of Cabling Work) Declaration 2013* consultation and would like to thank the ACMA for providing an extension to complete this submission.

We also found that it was particularly advantageous to sit down with the ACMA to work through the issues and seek clarification of the intent behind the proposed changes, and the subsequent correspondence providing further clarifications. Building upon these conversations, Communications Alliance wishes to provide the following responses to the questions provided in the consultation paper.

Question 1: Do you have any comments on the proposal to include the references to the 2 standards and guideline in the draft *Types of Cabling Work Declaration 2024*?

Communications Alliance notes at the time of this consultation, both AS/CA S035:2015¹ and G642:2016² are being revised. Communications Alliance supports that the draft Instrument will automatically incorporate newer editions of these two documents when they are published.

Question 2: Do you have any comments on our proposed amendments included in item 1 of Schedule 1 to the new *Types of Cabling Work Declaration 2024*?

Our understanding that the proposed change to *Schedule 1 Item 1* 'Cabling work performed by or on behalf of a broadcaster or narrowcaster' has been specifically introduced to limit its application to installations where the G642 Guideline provides an exemption to the *Telecommunications Cabling Provider Rules 2014* (CPRs) for all Broadcast Cabling Work performed in accordance with the Guideline.

This restriction addresses the potential misapplication of *Item 1* to other cabling installations, such as TV antenna cabling in residential/domestic premises, including the installation of Ethernet over Coax (EoC) adapters. Further comments on EoC adapters are provided below.

¹ AS/CA S035:2015 Requirements for installation of temporary field telecommunications customer cabling for defence purposes. <https://www.commsalliance.com.au/Documents/all/Standards/S035>

² G642:2016 Installation of Broadcast Cabling and connection of Digital Broadcast Equipment to a Telecommunications Network. <https://www.commsalliance.com.au/Documents/all/guidelines/g642>

Communications Alliance supports the intent of the proposed change to *Item 1*.

In addition, Communications Alliance continues to support the exemption of Broadcast Cabling Work performed in accordance with the G642 Guideline, as allowed for under *Item 1*.

Addressing EoC adapters

Communications Alliance first raised the issue of the potential problems arising from the practice of installing EoC adapters in customer premises with the ACMA back in May 2022. It is pleasing to see that the ACMA has given due consideration to this issue in this consultation.

Under the current regulatory arrangements, it is Communications Alliance's understanding that unskilled persons can purchase cabling and products from retail stores with the intent to install a TV aerial cabling distribution system within a customer's premises. We note that TV aerial cabling is not subject to the CPRs and the ACMA has no remit over the installation of TV antenna cabling in customer premises.

The installation of a pair of EoC adapters, and the repurposing of the TV aerial cabling system between these adapters, to also distribute telecommunicators services supplied by a C/CSP, brings this cabling under Customer Cabling regulations. By connecting the first EoC adapter to a Telecommunications Network, the TV aerial cabling downstream from that adapter becomes Customer Cabling and would then be subject to the CPRs.

As TV aerial cabling (prior to any modification) is not subject to the CPRs, the cabling does not have to, and is unlikely to meet, either the AS/CA S008³ Customer Cabling product Standard or the AS/CA S009⁴ Customer Cabling installation Standard. The use of non-compliant TV aerial cabling to carry telecommunications services may undermine the health and safety of the users, cablers working on these cabling installations and those users who are dependent on telecommunications services being provided over this cabling.

The repurposed TV aerial cabling would need to be verified by a skilled person, typically a registered cabler, prior to the installation of the EoC adapters. It would need to be verified that it meets the Customer Cabling regulations, specifically the requirements in AS/CA S008 and AS/CA S009 Standards, and that it is fit for purpose. If a registered cabler was to perform Cabling Work, the cabler would need to consider the risk of installing EoC adapters, which may be unlabelled Customer Equipment (CE), and that the TV aerial cabling meets the applicable Customer Cabling requirements. From a practical perspective, it is hard to see under what circumstances a registered cabler would take on such a risk.

If the TV aerial cabling does not meet the appropriate Standards, or cannot be verified as such, then the installation practice should not be allowed. To take this one step further, the repurposing of any cabling - not just TV aerial cabling, as Customer Cabling, must be such that it meets the Customer Cabling requirements. Having said that, we do not see the need to prohibit the use of EoC adapters, as there may be legitimate installations where

³ AS/CA S008:2020 Requirements for customer cabling products.
<https://www.commsalliance.com.au/Documents/all/Standards/s008>

⁴ AS/CA S009:2020 Installation requirements for customer cabling (Wiring Rules).
<https://www.commsalliance.com.au/Documents/all/Standards/s009>

these EoC adapters can be installed. The regulations would need to make it clear under what conditions that this would be the case and as a minimum the EoC adapters will need to be labelled CE if they are connecting to telecommunications services. The introduction of warning label on the product or its packaging may also be advisable.

Communications Alliance understands that it is the ACMA's intention to provide further clarification via an Explanatory Statement to the proposed instrument that explains under what circumstances existing cabling in a customer's premises can be repurposed as Customer Cabling. We feel that it will be essential to make this explicit in the instrument itself, using EoC adapters as an example, along with supporting guidance on the ACMA website.

As this practice may be considered to be carried out by unskilled persons, including those within the DIY community, who would not be familiar with the ACMA regulatory instruments and accompanying Explanatory Statements, the information must be explicit and readily accessible for regulations to achieve their desired purpose.

Question 3: We propose to remake item 4 with changes to make it clear that end users can undertake their own cabling work if this involves the connection to a Telecommunications Network of a labelled associated Customer Cabling product, an unlabelled associated Customer Cabling product, labelled CE or unlabelled CE, unless the Cabling Work is within a building cavity. Do you have any comments on the proposed amendments relating to this item?

Communications Alliance understands that the terms 'labelled' and 'unlabelled' are in reference to the labelling provisions under the *Telecommunications (Labelling Notice for Customer Equipment and Customer Cabling) Instrument 2015* and the applicable telecommunications Standards mentioned. This is not clear in the current drafting. It is noted that devices can still have RCM labels to demonstrate safety and EMC compliance.

Communications Alliance notes that a registered cabler is only allowed to perform Cabling Work to connect labelled Customer Cabling and/or labelled CE as per the requirements of Clause 4.3 of the CPRs. The ACMA must ensure that any changes to regulatory instruments do not unintentionally send a wrong signal to end users that it is permitted to connect unlabelled Customer Cabling and unlabelled CE to telecommunications services in view of the safety and EMC risks posed by unlabelled Customer Cabling and unlabelled CE.

Finally, an anomaly has been brought to our attention in that the current wording in *Item 4* allows ordinary people to use cords for underground and aerial Cabling Work, provided that the cord does not enter a building cavity, as the current wording has been written with indoor situations in mind.

If you have any questions with respect to this submission, please contact Mike Johns at Communications Alliance on 0414 898 841.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Stanton', written in a cursive style.

John Stanton
Chief Executive Officer

Communications Alliance

Communications Alliance is the primary communications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including carriers, carriage and internet service providers, content providers, platform providers, equipment vendors, IT companies, consultants and business groups.

Its vision is to be the most influential association in Australian communications, co-operatively initiating programs that promote sustainable industry development, innovation and growth, while generating positive outcomes for customers and society.

The prime mission of Communications Alliance is to create a co-operative stakeholder environment that allows the industry to take the lead on initiatives which grow the Australian communications industry, enhance the connectivity of all Australians and foster the highest standards of business behaviour.

For more details about Communications Alliance, see <http://www.commsalliance.com.au>.