

TITAB Australia
Cabler Registry
Services

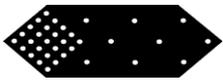
**TITAB AUSTRALIA SUBMISSION TO ACMA 2023 on
Proposal to remake the Telecommunications (Types of Cabling Work)
Declaration 2013**

Please find attached the submission from TITAB Australia for the Proposal to remake the Telecommunications (Types of Cabling Work) Declaration 2013.

If any further clarification is required please feel free to contact Kevin Fothergill in the national office of TITAB Australia on 03 9631 0800 or kevinf@citt.com.au .

Yours faithfully

Kevin Fothergill
Registrar
25/11/2023



TITAB AUSTRALIA SUBMISSION TO ACMA 2023

on

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

Introduction

Industry feedback has been supportive of the update of certain aspects of the 2013 version and continuation of the recognition of key risks: Electrical safety and integrity of telecommunications networks. Successive reviews have seen strong support from the industry for continued recognition of these two risk elements and the rewording from the traditional version retains the original intention.

TITAB supports the stated intention of the update "...to make the Types of Cabling Work Declaration 2024 to ensure there continue to be minimum requirements in place to manage the risks posed by certain types of cabling work...".

The main changes summarised in the Issue/s for comment do not appear to detract from the intention of the document to, in essence, update an important industry reference document.

ACMA CPR Registered cablers

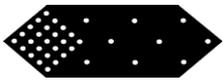
TITAB has consistently supported continued regulation of the customer equipment sector and retention of the role of ACMA as a regulator, while recognising there has been significant deregulation since the monopoly days of PMG/Telecom Australia/Telstra.

In the many cabling sector reviews that have been conducted by ACMA of customer cabling activities, the evidence has been that there is a need for a strong regulator to avoid the industry falling into the trap of allowing market forces to dominate standards.

Registrars are part of a model where cabling registrations are handled at their level and many decisions are made regarding qualifications and work experience criteria, but there is a need for a strong regulator who can carry out inspections and audits, even if only on a needs basis.

The complaint data recorded by ACMA is inconsistent with the number of complaints to the TIO, however, the TIO figures are not broken up so it is not possible at this point to demonstrate that poor, non-standard customer cabling plays an active role in poor data performance and bad service delivery by RSPs. Anecdotally, there is evidence that poor cabling is a contributor to a significant number of complaints that are not picked up by ACMA data.

It seems obvious that from a customer point of view the TIO is the first port of call for a faulty installation, not ACMA.



All the other essential services such as fire, electrical and plumbing have strong regulatory requirements for both the installation and maintenance quality and a registration format for the on-site skilled tradesmen.

TITAB has argued consistently for stronger enforcement of regulation by ACMA and the boosting of audits and inspections and the retention of the original principles of this declaration is a positive step. If supplemented by a stronger inspection and audit regime, combined with the support of the registrars, *this declaration would be even more important and cablers would have extra incentive to ensure they are abiding by requirements.*

Types of cabling work exempt from requirements of Division 9

Traditionally, customer cabling that is used or to be used by broadcasters, criminal law enforcement agencies under a lawful warrant and the Department of Defence or Defence Force, where it is for a temporary field telecommunications facility, has been treated differently and we see no issues with continuation of the current principles in the proposed declaration of 2024.

Minor changes as identified

The relatively minor changes identified in consultation with industry participants should improve clarity in certain provisions and the removal of outdated references will be welcomed by many cablers, who would see the declaration as a dynamic document to be updated as the industry evolves.

Insertion of new standard clauses is really a matter for the ACMA drafting team, but should be helpful in future interpretations. Removing obsolete references to a standard or guideline and a repealed act, is a logical move and will help to show that the document is a living document and current.

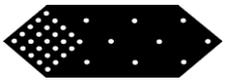
Updating outdated references in industry documents

Removal of the ACA TS 024-1997 makes sense as it is a redundant standard.

Regarding the proposal to remove the definition of "Wiring Rules" in Section 4, while the term Wiring Rules may not be directly referenced as indicated in the consultation paper, nevertheless it is a common term well known to the industry over time and inclusion would deserve reconsideration by the ACMA for continued use, albeit with some grammatical changes to the text to establish context. *We do not believe the definition is redundant as stated in the paper.*

Regarding the referencing of the two industry standards and one industry guideline that have been updated, it is a sensible arrangement to ensure that the wording caters for future amendments without having to go back to the drawing board, so to speak.

The two standards referred to have historically been fairly well monitored by the fire protection sector and defence so their treatment in this matter is consistent with past practice.



With installation of broadcast cabling and connection of digital broadcast equipment to a telecommunications network, there needs to be monitoring of this in the field situation, as the conversion of technologies and introduction of digital technologies in particular, have made interpretation of requirements in the sector more difficult and more likely that breaches will occur intentionally or unintentionally, with the associated risks.

The definition relating to each document being drafted to ensure future-proofing is again a sensible move and will help maintain the relevance and currency of the declaration.

Question one

Our earlier comments on maintaining currency and relevance of the document apply and we support the proposal to include the references to the two standards and guidelines in the updated 2024 version.

Cabling work in broadcasting

There can be interpretation issues relating to work on certain customer cabling in broadcasting and removal of ambiguity is welcome. Repurposing of TV antenna cabling as customer cabling is not a good industry practice and we would like ACMA to discourage this in all relevant documentation.

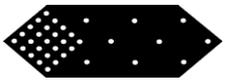
Currently, there is some confusion in the sector over the requirement for registered cablers and removal of the ambiguity referred to, will be helpful, but ACMA does need to better promote the use of registered cablers in the sector more widely and with clarity. Registrars have been helpful in promoting guidelines and requirements in the industry at large and may be engaged to assist in a joint public campaign on CPR registration requirement in the broadcasting sector.

Question two

The proposal seems to be consistent with the intention of the document to effectively maintain the status quo, but with improvements to modernise the document. While it is recognised that the wording clearly sets out the issues of a building cavity installation versus a non-building cavity installation, the common term of patch cords may be useful in providing an example that can be conveyed to customers and cablers so that they more clearly understand the rules and when a registered cablers must be used.

There are situations where customers do not understand that cabling cannot be placed in cavities or through walls and this matter does need some publicity from ACMA as the wording in the declaration may not be readily understood by a “layman” and the complexity associated with the wording of the unlabelled and labelled product can also be confusing to a customer without ready advice.

There is today, common use of “plug and play” and the inclusion of the gaming consoles and similar equipment suitably updates the provisions.



Question three

Again, as stated earlier there is a lot of customer confusion over when to use a registered cabler and the use of well understood terminology such as direct reference to patch cords may be helpful in clarifying requirements for customers. Allowing end users to undertake their own cabling work is problematical in any event.

While the amendments may seem clear to those in the industry experienced with interpretations, there needs to be great care as to how approval for end users to undertake their own cabling work is worded. There are elements in the customer base who will mis-interpret at every opportunity so it is essential that is made absolutely clear where end-users can undertake their own cabling work and the references to labelled or unlabelled will not be readily understood by many customers.

Conclusion

Overall, the update makes sense and with the exceptions we mentioned such as in question three, the document is clearly worded and the update will be welcomed by the industry. The ability to include standards and guidelines that will in effect be “future-proofed” is also welcome.

A general comment we would make is that ACMA should resume the previous level of audits and inspections, as there is clear evidence in the industry of around 30% non-compliance to serious regulatory requirements.

The update of the declaration can be an opportunity for ACMA to embark on a public campaign to encourage compliance by cablers and to better inform the public as a whole, via industry bodies such as ADTIA and the registrars and utilise the sections of the media with a focus on telecommunications, electrical and IT, such as the Connection Magazine group.

Key regulatory requirements need to be promoted, such as adhering to national technical standards and cabler registration and the mandatory issuing of compliance certificates. These are important tools to ensure long term integrity of the network and safety of network users and cablers. The last metre of cabling is as crucial as the rest of the technical network and the crucial role played by telecommunications in most aspects of life – especially alarms and emergency services activity - is well recognised by the public, as more recently shown by the Optus network failure.

ACMA can play a crucial role in ensuring that the public have a secure, reliable network and while updating of documentation is welcome, the need for a fair and consistent regulator is obvious.

This submission was prepared in the National Office of TITAB Australia.

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