

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

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

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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?*

Our understanding is there is no material change to the 2 standards with the remake to maintain the status quo for another 10 years.

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?

Item 1 of Schedule 1 to the Types of Cabling Work Declaration 2013 provides that cabling work involving customer cabling that is used or is to be used by broadcasters or narrowcasters and that meets other requirements is not a type of cabling work for the purposes of the regulatory arrangements imposed by Division 9.

At a recent meeting of the ADTIA Communications Advisory Group, there was concern raised at the repurposing of TV antenna cabling as customer cabling.

ADTIA does not support the repurposing of TV antenna cabling as customer cabling as it is not seen as good industry practice. Antenna cabling may not be fit for purpose and may not comply with industry installation standards. *If antenna cable (coax or ribbon) is repurposed then it must comply with S009 for the purpose it is to be used.*

We would suggest that ACMA takes this approach in its relevant documentation.

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 customer equipment or unlabelled customer equipment, unless the cabling work is within a building cavity.

Do you have any comments on the proposed amendments relating to this item?

Proposed amendment appears to be accepting current practice and simplifying the wording. It is noted that more consoles are now Wi-Fi connected to the network rather than hard wired.

Of concern is that customers are often confused as to when to use a registered cabler. Simpler language terminology will help customers better understand requirements.