20th December 2024

To: The Manager Infrastructure and Equipment Safeguards Section

Australian Communications and Media Authority

Comments to the Proposal to remake the sunsetting Telecommunications (Labelling Notice for Customer Equipment and Customer Cabling) Instrument 2015 and 8 telecommunications standards Consultation paper

C-PRAV thanks the opportunity to submit our comments to the proposal

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Question 1**

1. Is it necessary and appropriate for the ACMA to remake the 7 technical standards due to sunset?
2. Should the ACMA allow AS/ACIF S016-2015 to sunset? If no, please explain your reasons why the standard should be remade.

Ans to Q1 a) We agree to the remake of the 7 Technical standards. However, we note that the technology referred by some of these standards are obsolete or on their way to become obsolete. Similar to the 2G and 3G shut down decision dates, unless there is a categoric closure of these technologies one cannot assume that these technologies won’t continue to exist. Hence, if used with the network, they may continue to pose the risk or threat to be non-compliant.

It is also important that Carriers and Service providers ensure that such products are safe and compliant to connect to their networks.

Ans to Q1) b) We recommend sunsetting this standard AS/ACIF S016-2015

**Question 2**

Do you have any comments on our proposal to change terminology to clarify the items to which the technical standards apply and to align with the definitions of customer cabling and customer equipment in subsections 20(4) and 21(4) of the Act?

Ans to Q2) Yes agree the alignment for consistency

**Question 3**

Do you have any comments on our proposal to remove the provisions in Part 6 of the TLN?

Ans to Q3) Yes. If ACMA wants to pull of this role, it is strongly recommended that ACMA appoints 3rd party certified inspectors and auditors. In a self-declaration scheme of approvals, audits and inspections are very vital to ensure compliant products are used in Australia. Also to have a level playing field, all manufacturers, importers and suppliers of such product need to comply with the regulations, not just big corporates but all big and small players. Network security cannot be jeopardized. Additionally, the carriers depend on ACMA’s product compliance and don’t have their own review process which calls for ACMA’s robust compliance process.

**Question 4**

Do you have any comments on our proposed amendments to Schedule 1 to the TLN?

Ans to Q4) Yes, agreed

**Question 5**

Do you have any comments on our proposal to align particular pre-labelling and record- keeping requirements in the new TLN with the General Equipment Rules (where possible and as proposed above)?

Ans to Q5) Agree with the changes

**Question 6**

Do you have any comments on our proposed amendments to item 3 of Schedule 2 to the TLN? If so, please specify your reasons and provide evidence to support your position.

Ans to Q6) Option 1 is highly recommended if hearing aid also falls into this category. Even if otherwise Option 1 is recommended as Option 3 and 4 preferred by ACMA exempts headsets not intended to connect to STS (there are technologies which are other than STS that have headsets connected) and if not connected physically to Analogue CE (what if it connects to digital CE ?)

**Question 7**

Do you have any comments on our proposed amendments to labelling cabling items?

Ans to Q7) Agree with the changes

**Question 8**

Do you have any comments on our proposal to remake the Disability Standard?

Ans to Q8) Yes agree with the proposal to remake the disability standard to take into consideration the advancement of technology and devices used

**Additional:** We presume the Technical Standard AS/CA S042.x though not mentioned in this paper will be part of the General Equipment Rules. The level of conformity Level1/2/3 can be clarified further.

**\*\*\*end of comments\*\*\***