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### **Comments on the draft Industry Code on the Next-Generation Broadband Systems Deployment in Customer Cabling by ACRS**

The Australian Cabler Registration Service (ACRS) is one of the five national Cabler Registrars authorised by the Australian Communications and Media Authority (ACMA) to register and regulate workers and businesses in the computer cabling industry in Australia. ACRS currently has over 28000 Cablers registered to perform work in the industry which is the second highest number of the five registrars in the country.

ACRS takes several thousand enquiries annually from workers in the industry and assists workers become competent via the relevant Registered Training Organisations to obtain the necessary certifications required by ACMA to perform the various categories of cabling work.

ACRS believes that this code will assist Cablers in the industry keep pace with the fast pace of change and exponential rollout of the broadband network in Australia at present and is supporting of the main thrust of the three documents.

Cablers need to understand the technical requirements, performance standards and shared cable bundle arrangements for new and legacy services of Carriers and Carriage Service Providers to enable them to connect these services to the consumer's home in a way that does not detract from carriage performance. Importantly, Cablers also need to manage customer expectations as the public interface of the industry as installers in the home.

ACRS encourages more consultation between Carriers and Installers for this reason as complaints about the performance of broadband services in Australia to the Ombudsman are at an all time high. Many of these complaints are as a result of poor understanding of the technical performance capabilities of broadband systems and more recently dubious promises to customers about internet speeds deliverable.

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As the public face of the industry Cablers have a unique role to play in managing these expectations and explaining technical issues to consumers in an understandable way. ACRS would like to see Cablers engaged more in the industry by carriers via this code and to be included in future development and review processes.

ACRS also believe that Cablers could also have an ongoing role in monitoring and reporting on compliance with the code as they will be the ones who are in the consumer's homes measuring the output at the pointy end of the broadband system. ACRS would like to encourage discussion on how this could happen and potential methods of remuneration for Cablers to undertake this role in the industry.

ACRS appreciates the opportunity to comment on this code and are happy to discuss any of these ideas further with the Alliance and or standards body in order to either clarify or pursue these opportunities. Further discussion can be arranged by contacting Mick Logan on 0497 646 055.

Regards

A handwritten signature in black ink that reads "P. Lamont". The signature is written in a cursive, flowing style.

Peter Lamont

Director ACRS

6<sup>th</sup> December 2017