

**Submission on:**

**PUBLIC COMMENT DRAFT DR AS/CA S008:2019**

**Requirements for customer cabling products**

**PUBLIC COMMENT DRAFT DR AS/CA S009:2019**

**Installation requirements for customer cabling (Wiring rules)**

**DR AS/CA S008:2019**

**Requirements for customer cabling products**

**(xiv) new pit and access hole requirements including cover labelling, installation methods and testing documentation. (Clause 5.8.1)**

Clause 5.8.1.3 b) is not clear whether this applies to the PIT OR ACCESS HOLE PRODUCT in either a stand-alone or installed state, and whether it is a test of a representative item, or every item. The statement should be from the manufacturer, which may be supported by information provided by an engineer (to put it in the correct order of contracts).

**(vi) prohibited markings for underground conduit (Clause 5.3.3.2).**

A further note should be added to S009 for clarity explaining how this clause interacts with the prohibited colour clause 8.3.1

**DR AS/CA S009:2019**

**Installation requirements for customer cabling (Wiring rules)**

**(ix) new cable size and temperature requirements for generic cabling and cabling linking distributors (Clause 5.6).**

The term “engineered solution” is not defined.

**(xii) new requirements for plug terminated cabling (Clause 5.9), superseding the existing ‘Connection of customer equipment’ requirements, addressing both manufactured and site-terminated cables.**

I feel Clause 5.9.1 would be assisted by an illustration

Clause 5.9.2 appears to be overly restrictive. The example that springs to mind of a previously assembled patch cord on site is a made to measure (of a correct length) RJ12 to RJ45 lead for telephones.

**(xiii) new requirements for movable cabling including flexibility and strain relief (Clause 5.10).**

A note should be added clarifying how this clause relates to “soft wiring” systems often associated with office furnishings.

**(xxii) requirements for pits and access holes in vehicular areas have been updated and guidance on the provision of information on location, appearance and illustrated instructions for operation and maintenance.**

Clause 18.1.3 b) needs to address the following two cases more clearly

- I. selection of a manufacturer certified design (by the process described in S008) by a cabling provider (For example, the cabling provider taking guidance from AS 3996 and selecting a Class B pit based on the traffic load)
- II. the use of an “engineered solution” to meet site specific requirements; with the “engineered solution” either being once-off or a standard site detail

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