

20190411 Public comment on DR AS/CA S009:2019 from Conquest Communications 1

From: Trevor Conquest
Sent: Thursday, 11 April 2019 1:51 PM
To: Kevin fothergill; Dominic Schipano; Gabriele Giofre
Cc: Mike Johns
Subject: Conquest on New S009

HI

I am reviewing the new S009

Overall it is an improved standard

I do have a problem with the ongoing politics between the electrical industry and the telecommunications industry

Please review my comments below

I note ADTIA was a voting member of the committee

I'm not happy with the lack of recognition of the telecommunications trades given by the definitions and wording used as highlighted below

The absolute lack of small business industry representation on the committee is an ongoing concern, no consultation as to 80% of users

Also of note is that the ACMA is a regulatory authority but they do not issue licences for telecommunications work, they issue registrations

Named person types

IEC 62328 SCOPE from SA website

https://infostore.saiglobal.com/en-au/Standards/AS-NZS-62368-1-2018-99147_SAIG_AS_AS_208470/

This part of IEC 62328 specifies safeguards for ordinary persons, instructed persons, and skilled persons. Additional requirements may apply for equipment that is clearly designed or intended for use by children or specifically attractive to children.

NOTE 3 - In Australia, the work conducted by an instructed person or a skilled person may **require formal licensing from regulatory authorities.**

Given Telecommunications trades at Cert 3 level are registered with the ACMA, it would appear a Telecoms tradesman is not licenced by an authority as this standard IEC 62328 specifies

But electricians are licenced, the implication also does not recognise a Cert 3 Telecoms tradesman as also being a skilled person

The new S009 seems to contradict this IEC 62328 standard by stating

During initial installation, a SKILLED PERSON (i.e. a registered cabler) and an INSTRUCTED PERSON can work on ES3 telecommunications CABLING. After initial installation and commissioning, only a SKILLED PERSON is allowed to have access to the conductors of an ES3 system. Access by an ORDINARY PERSON is not allowed.

INSTRUCTED PERSONS and SKILLED PERSONS may be required to be a registered cabler and a licenced electrician.

SEE APPENDIX F, Introduction, page bottom

Instructed and SKILLED PERSONS (CABLING PROVIDERS) need to be aware that ES2 circuits may exist on TELECOMMUNICATIONS NETWORKS and may appear on some LINES at an MDF, NTD or other CABLE termination device

SEE F.4 Implications for ES2 Cabling

This time the reference is to Cabling Provider who clearly is unlicensed

Suggestion

4.2.86 skilled person

person with relevant education or experience to be able to **identify electrical hazards** and to take appropriate actions to reduce the risks of injury to themselves and others [AS/NZS 62368.1]

Clearly the intention is that a skilled person is a LICENCED electrician

So why don't you simply define the trade qualified Telecommunications person, and add the additional wording throughout as appropriate

Skilled Telecommunications/Communications worker

person with relevant education or experience to be able to **identify telecommunications hazards** and to take appropriate actions to reduce the risks of injury to themselves and others [AS/CA S009:2019]

cheers

Trevor