

**STANDARDS AND ACCREDITATION
PRODUCTIVITY COMMISSION ISSUES PAPER
ACIF SUBMISSION**

1. Introduction

ACIF is pleased to have this opportunity to make a submission to the review of Australian government's relationship with Standards Australia and the National Association of Testing Authorities.

ACIF operates on the central premise that the best outcomes for all stakeholders in Australian telecommunications can be achieved by co-operation. In this context, ACIF supports the policy objective of the *Telecommunications Act 1997* to promote the greatest practicable use of industry self-regulation without imposing undue financial and administrative burdens on industry.

Formed as a company limited by guarantee and a not-for-profit membership-based organisation, ACIF is ideally placed to reflect and respond to the dynamics of the telecommunications industry. Its membership comprises carriers/carriage service providers, business and residential consumer groups, industry associations and individual companies.

ACIF has opted for the approach of a general response to some of the matters in the Issues Paper, from the dual perspective of being a Standards developer and a Standards user. Our response focuses on the issues related to Standards setting and not accreditation which is outside our scope of work.

2. ACIF as a Standards Development Organisation

One of ACIF's functions is the maintenance and development of customer equipment Standards for the telecommunications industry. ACIF has been carrying out this role since 1997 with the introduction of the *Telecommunications Act 1997* when the telecommunications industry assumed a self-regulatory role.

ACIF was accredited as a Standards Development Organisation (SDO) in 1999 by the Standards Advisory Board and was recently re-accredited in July 2005. This accreditation allows ACIF to develop Australian or joint Australian/ New Zealand Standards. While ACIF may not replicate the procedures and structures of Standards Australia, we meet the same performance requirements of transparency and openness in the manner

in which committees are formed, comments are disposed of and decisions reached.

To date ACIF has developed thirty-six Standards, including revisions, for the telecommunications industry. By way of example, the following two publications provide an indication of our Standards activities:

- the introduction of broadband telecommunications services such as ADSL saw ACIF develop the necessary equipment Standard AS/ACIF S043 *Requirements for Customer Equipment for connection to a metallic local loop interface of a Telecommunications Network* together with the complementary Network Deployment Code for these services.
- the 55,000 telecommunication cabling in our industry require clear and up to date installation instructions and a two year project carried out by ACIF recently came to a conclusion with the major revision of the AS/ACIF S009 *Installation requirements for customer cabling (Wiring Rules)*.

3. MoU with the telecommunications regulator

Australian Standards published by ACIF are submitted to the Australian Communications and Media Authority (ACMA), as the communications regulator, for adoption as enforceable legislation.

Under the 1998 Memorandum of Understanding with the Australian Communications Authority, and subsequently carried over in July 2005 by ACMA, ACIF has the responsibility to maintain the existing (pre-1997) ACA Technical Standards and revise them as required and develop new telecommunications Standards (designated as AS/ACIF Standards).

4. Standards Development

In discussing the efficiency and effectiveness of Standards development in Australia, we will draw upon both our experiences as an SDO and our observations as a user of Australian Standards.

In 2005, ACIF underwent a thorough process review and carried out a wide consultation with our stakeholders with the goal of improving our methods of identifying their needs and producing the required outcomes efficiently and in a timely manner.

Of relevance to the Issues Paper are the following six themes that were identified in the review.

a. Efficient processes

Developing Standards is a resource intensive process that requires proper project management disciplines, including well managed resources, specific timeframes and defined outputs. The environment has to be conducive to managing many, and usually competitive, stakeholder interests to arrive at consensual outcomes. The processes are underpinned by the *ACIF Operating Manual for the Development of Codes, Standards, Specifications, Guidelines and other Supporting Arrangements* which has provided the framework for the development of AS/ACIF Standards to date.

Processes for Standards development need to be in place to ensure that committees have balanced representation of all stakeholders, with adequate consultation during the life of the project. The processes have to be responsive and transparent and employ a continual review for process improvement.

b. Managed resources

The expertise that is required to develop Standards comes predominantly from industry members and consumer representatives, together with a close consultative relationship with the regulator. Effective Standards development must recognise the value of the participant's contributions and have processes in place to minimise the impost on their time and resources.

ACIF has favoured the approach of establishing targeted committees for dedicated projects and disbanding the committees on completion. Together with strict project management procedures and intermediate milestones, those participating in Standards development have a clear understanding of the extent of the task at hand.

c. Targets

It is common in Standards development (both nationally and internationally) of target slippage which can be attributed to many factors. Proper project management can introduce controls to identify the causes of delays and keep the project on target or at a minimum adjust the parameters of the project accordingly.

d. Technical expertise

ACIF conducted a review of its Standards development activities in 2005 and two of the findings are worth noting:

- there is an ever increasing need for alignment to international Standards in the global market.
- with the globalisation of telecommunications products, together with the diminishing local manufacturing sector, Australia is finding itself in a position where the expertise base is shifting to other countries. The resulting trend is that we are becoming more reliant on international and other regional Standards and at the same time our capability to develop national Standards is declining.

In this respect it is critical for Australia to ensure that those involved in developing Standards have sufficient awareness, exposure and presence in international standardisation to ensure that Australia has the most appropriate Standards for its needs.

It is also our observation that in the current economic and commercial environment, it is becoming increasingly more difficult to engage industry experts in volunteering their time to Standards development activities.

e. International alignment

ACIF recognises its obligations under the World Trade Organisation's *Code of Good Practice for the preparation, adoption and application of Standards*. Within the constraints of Australia's telecommunications regulations, ACIF aligns our national Standards with international Standards as appropriate and at the same time minimises specific national variations in these Standards. This approach is essential in a global market to facilitate our export market and enable ready access to overseas markets for importation.

f. Availability of Standards

Since ACIF commenced developing Standards, we have maintained the approach to have our Standards free of charge and readily available from our website. This approach, favoured by industry members and also adopted by some overseas standardisation bodies, such as the European Telecommunications Standards Institute (ETSI), has proved to be a successful model in achieving market acceptance.

With ACIF being primarily funded through membership, our model is in contrast to that of Standards Australia with their reliance on publication sales.

5. Relationship between Standards Australia and ACIF

As an accredited SDO, ACIF maintains a close working relationship with Standards Australia. Our Standards development activity focuses primarily on telecommunications customer equipment Standards which are submitted to ACMA for adoption. ACIF pays close attention to complementary activities and potential areas of overlap which include, for example, those of electrical and acoustic safety and communications cable/cabling.

The successes that ACIF has achieved within the telecommunications industry comes as a result of the attention we give to managing this relationship and ensuring that ACMA and all the stakeholders have a clear understanding of the roles of the standards developers and that the Standards that both organisations develop meet their needs.

6. Government involvement and concluding remarks

The importance of the involvement of all stakeholders who have an interest in or may be impacted by Standards cannot be overemphasised. Standards development is a resource-intensive activity which competes directly with the available time that participants can contribute.

To have a successful, efficient and effective Standards setting regime in Australia, it is important that Australia has access to the necessary technical expertise and is sufficiently resourced to carry out the work in a timely manner in a rapidly evolving environment. It is essential for Australia to have a viable and healthy standards development capability. Both Standards Australia and ACIF have key roles in this endeavour.

Standards Australia, as the national Standards body in Australia, has an important role in meeting the public needs of all Australians in order to deliver the required Standards that are in the national interest. The support afforded by government funding to assist Standards Australia, particularly in international Standardisation activities, is essential. It is important for the interests of Australian industry, government and users to be represented during the development of international Standards. It is more critical in the rapidly evolving communications environment.

ACIF would also be interested in exploring opportunities for government support for its international standardisation activities in the same manner as provided to Standards Australia.