

To whom this may concern,

Thank you for the opportunity to provide a response to Communications Alliance LTD's DR AS/CA S009:2019.

Please do not hesitate in contacting myself if you have any further matters within my response that need further explanation or clarification.

Kind regards,

John Wall

Comments

1. 3 References

This section has removed the normative reference. This means that none of the standards listed are required to be followed by this standard. Some of these standards deal with safety, i.e. AS/NZS1768.

This version has reduced the safety of persons working on telecommunications.

2. 3 References

This section does not list the cabling standards, i.e. AS/NZS 3080. This suite of standards should be listed as informative references

3. 8.2 Improper support cabling

Can a new sentence be added to state that a customer cabling supporting infrastructure, i.e. a catenary wire shall not be connected to other services supporting infrastructure.

I have instances where the data cabling catenary wire is connected to the electrical cable tray.

4. 8.2 Improper support cabling

Can a new sentence be added to state that a customer cabling supporting infrastructure, i.e. a catenary wire shall not unduly put pressure on other services cabling supporting infrastructure

I have instances where the data cabling catenary wire is bent underneath the electrical cable tray putting pressure on the electrical cable tray. Technically it's not secured to the electrical cable tray. I also have instances where the data cabling catenary wire is sitting on top of the electrical cabling catenary wire. Technically it's not attached but it is putting a strain on the data cabling catenary wire.

5. 10 Surge Suppression

With the removal and the normative reference AS/NZS 1768:2007, this now means that this section which stipulates to use AS 4262.1 shall be used. AS 4262.1 is a standard that has not been updated since 1995. This standard is obsolete. Why has this not been changed to reference AS/NZS 1768?

AS 6262.1 basically states that unless you are in Darwin, you don't need surge protection. Using this standard solely will cost people their lives.

6. 10.2 Installation of surge suppression where required, Note 3:

This note states that it is recommended, however section 5.2 states that you shall meet the manufactures instructions. This section needs to either be a shall or change section 5.2 to be a recommendation only.

7. 16.1 Cable Flammability

The first paragraph states customer cable should meet S008. S008 is mandatory. This sentence is in direct conflict with S008. S008 clause 5.6.11.1 mandates that all cabling run indoors meets the flammability requirements

This is confusing the cabling installer on what they should and what they shall do. Just make it simple.

Either:

Change this to shall or remove the mandatory requirement to meet S008 for all indoor cabling;

Update S008 to allow that indoor cables do not need to meet the flammability requirement upto the first socket, although how does this now affect optical fibre cabling run between buildings;

Maybe you could do what the Americans do and just state that cabling upto 15m is allowed to not meet the flammability ratings

Could it be changed to state that cabling run indoors does not need to meet the flammability requirement until it crossed the first fire barrier

8. 16.1 Cable Flammability, Note 1

The first paragraph states customer cable should meet S008. S008 is mandatory. This sentence is in direct conflict with S008. Either change this to shall or remove the mandatory requirement to meet S008.

9. 16.6 Cabling in lift and hoist shafts

Modern installation of communications cabling in lifts is now moving to optical fibre as IP cameras and wireless access points are required to be installed. I've yet to see a complaint CAT6A trailing cable to be offered (I don't know if this is because of lack of demand or an inability to meet the performance requirements).

The use line isolation devices for installation of optical fibre would seem redundant and an unnecessary cost burden.

10. 18.1.7 Information about pits and access holes

The sentence above the (a) does not start with a capital letter and does not make sense. I think there might be some words missing.