

## COMMUNICATIONS ALLIANCE

### Customer Equipment and Cable Reference Panel

## Expression of Intent EOI/22/002 Plug-terminated customer cabling



### AS/CA S009:2020 Installation requirements for customer cabling (Wiring Rules)

The *Customer Equipment and Cable Reference Panel* (CECRP) established a *Publication Advisory Group* (PAG) in 2004. The purpose of the PAG is to provide the opinion of experienced members of the Communications Alliance technical bodies to queries of the intent of specific requirements in published Standards and Guidelines for which the CECRP is responsible.

The following notes are to be read in conjunction with the attached *Expression of Intent* (Eol):

1. The PAG consists of active members of the CECRP, but its opinions are those of the PAG and are not voted decisions of any Communications Alliance Working Committees.
2. When it is felt that a query arose due to a possible lack of clarity in a Standard or Guideline, the matter is brought to the attention of the CECRP to be considered for future work. However, this will not necessarily lead to any future amendment of the Standard or Guideline.
3. The PAG is restricted to expressing the intent of the words of the publication in question, as the members of the PAG either recollect the original intentions of the Working Committee that developed the Standard or Guideline, or is based on the opinions of nominated advisors within the telecommunications industry. The Eol is not an interpretation of the requirements of the publication.
4. The Eol has no regulatory or legal status and represents only the PAG's view of the intent or likely intent underlying the relevant publication. Eols are issued to explain and clarify the intent or likely intent of the Standard or Guideline and do not constitute an alteration to the original Standard or Guideline or provide new requirements. The PAG cannot make new rules to fit situations not yet covered in the Standard or Guideline. Changes to the Standard or Guideline are made only through revisions or amendments to that publication.
5. The PAG does not provide a consultancy service where organisations are in disagreement on whether a specific design or configuration meets the requirements of a particular Standard.
6. The Eol does not constitute legal advice. Any reliance upon or use made of the published *Expressions of Intent* (Eol) by the query submitter, or any other person, is solely at their own risk. Communications Alliance does not guarantee that compliance with any Eol will constitute compliance with the relevant publication.

Inquiries related to the Standards and Guidelines that have been developed under the CECRP are welcome. Such inquiries are to be forwarded through Communications Alliance to the secretary of the PAG. Responses are sent to the query submitter by the secretary and are circulated to members of the CECRP, the PAG and other technical advisors involved in the development of the response. *Expressions of Intent* (Eol) are published on the Communications Alliance website at [www.commsalliance.com.au](http://www.commsalliance.com.au).

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With respect to your query, please note that the CECRP response is restricted to expressing the PAG's view of the intent or likely intent of the words of the Standard concerned. Some queries therefore may be more appropriately addressed to the Australian Communications and Media Authority (ACMA), a test laboratory or experienced consultant concerned with Customer Equipment design requirements.

It is understood that the fundamental questions concerning AS/CA S009:2020 are:

The request is for some clarification of Clauses 5.9.1 and 5.9.2 in the following matters:

1. Clause 5.9.1

With Clause 5.9.1 does this mean that if an pre-terminated HDMI cable is installed to say a projector or a wall mounted TV that cable cannot be connected directly to the TV/Projector and amplifier going through a 'Brush' plate and that the cable would have to be fitted off to a HDMI socket wall plate and then a short patch cable to the equipment? Does this also apply to data and coax with plugs fitted by a cabler? Also if the equipment is in an AV rack (swing frame or floor mounted) where the clients can access the rear of the equipment would that mean that those pre-terminated cables would have to go to a fixed plate before going onto the equipment?

2. Clause 5.9.2

Would this mean that for example we do a lot of AV racks where we use rear ported switches and the like and we direct connect our data cables to those switches without going through a fixed patch panel is this still allowed to occur? If not, where does this stand with devices like HDBaseT equipment with the manufacturer states not to go through and patch or sockets and equipment to be directly connected? What about on ceiling mounted Wi-Fi access points, wall mounted intercoms and CCTV cameras would it be allowed to fit a plug to those pieces of equipment.

3. What I'm trying to get at is what are you trying to achieve with these rules? For what I can tell is that tell the outcome is to have a socket on the wall for everything so the client can't move any part of the fixed wiring.

In response to this query:

Referring to Clause 2.2 *Objective* in AS/CA S009, this Standard intends to 'protect the health and safety of any person who may operate, work on, or use ... or be affected by the operation of a Telecommunications Network or a Facility'. It also intends to 'protect the integrity (proper end-to-end functioning) of a Telecommunications Network or a Facility'.

AS/CA S009 applies to 'cabling work' for cabling that is defined as 'customer cabling' under the *Telecommunications Act 1997*<sup>1</sup>, which is described in the standard in Clause 2.1 *Scope*, and Clause 4.2.29 *Definition of customer cabling*.

Further clarification can be found in the *ACMA Telecommunications (Types of Cabling Work) Declaration 2013*<sup>2</sup> which lists in Schedule 1 the types of work that is not cabling work. This clarifies that connection of customer equipment to the communications socket, or the connection of customer equipment with other customer equipment, is not cabling work subject to AS/CA S009 provided that the interconnection cabling is labelled and is not 'concealed in a building cavity' such as a 'wall, floor or ceiling cavity of the building'<sup>3</sup>.

Building cabling that is part of an antenna system for use with broadcasting services<sup>4</sup>, or part of a standalone system that has no connection to a telecommunications network, is also not customer cabling for the purposes of AS/CA S009.

Cabling which is wholly or partly fixed to or concealed in the building that is intended to be used for services which may operate over a telecommunications network<sup>5</sup>, such as public telephony or the internet, is customer cabling that is in-scope of AS/CA S009.

Plug-terminated cabling on fixed or concealed customer cabling may be installed without intervening wall or building sockets, where the plugs are either out of arms reach or contained within a secure location. See Clause 5.9.1 (b) (iii) of AS/CA S009:2020.

To respond to the specific questions:

1. No. Please refer to the principles outlined in the response above. In short:
  - a. A registered cabling provider working within the scope of their registration may connect a plug-terminated cable coming out of a brush plate to an out-of-reach equipment.
  - b. Where another person is intended to make the connection to or between equipment, the fixed or concealed building cabling must terminate in a building socket.
2. No. Clause 5.9.2 does not apply to the question of concern. See response 1.
3. The intention is that only a registered cabling provider working within the scope of their registration may perform cabling work as defined under the *Telecommunications Act 1997* and instruments made under that Act.

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<sup>1</sup> Section 20 of the *Telecommunications Act 1997*: <https://www.legislation.gov.au/Details/C2022C00071>

<sup>2</sup> See <https://www.legislation.gov.au/Details/F2013L01845>

<sup>3</sup> *Telecommunications (Types of Cabling Work) Declaration 2013*, Schedule 1 (4)

<sup>4</sup> This has the same meaning as in the *Broadcasting Services Act 1992*

<sup>5</sup> Refer to the definition of Telecommunications Network in Clause 4.2.95 of AS/CA S009:2020