



national
electrical and
communications
association

ACMA Review of Customer Cabling Regulatory Arrangements

National Electrical and
Communications Association
(NECA)

Submission

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Introduction

This response is made by the National Electrical and Communications Association (NECA). NECA is the national industry association representing contractors responsible for the delivery of electrical, voice and data communications systems in Australia. It has approximately 5,000 businesses as its members which employ approximately 80,000 tradespeople. These range from very small operations, often comprising a single individual, or one owner with just a few employees to larger national companies employing many more people.

NECA actively represents the needs and best interests of contractors within the Australian Government and industry, ensuring members' needs are heard. NECA works to steer the future of the industry on critical issues such as licensing and regulations, training and education, skills and labour shortages, workplace relations and occupational health and safety.

NECA is one of the founding members of the Australian Electrical and Communications Alliance (ACEA) who will not on this occasion be submitting a response to the proposed changes.

As a peak industry body NECA has an interest in not only maintaining the current registration system for cabling, but also in maintaining or increasing the skill levels of those involved. It is also important to NECA that the communication of the proposed changes be managed consistently throughout industry and through the cabling registrars.

There is a lot of confusion around the cabling industry presently with various groups promoting "NBN ready" type courses etc, and therefore, NECA's overarching wish would be for a clear and transparent process for introducing and communicating any changes.

NECA previously ran Teledata Pty Ltd, who had a contract with Austel (now ACMA) to manage the then licensing system. Once the current system of cabling registrations was introduced, NECA was contracted to manage the transition process for cabling who expired under the old licensing system and wind down that operation. NECA therefore has firsthand knowledge of the practical challenges and the industry confusion that can occur. It is in light of this experience that NECA submits these comments.

NECA has representation on the Cabling Advisor Group (CAG) and understands that the CAG have provided a submission which tackles the more technical elements of the review. It is NECA's opinion that these technical experts are better placed to comment on those areas, and therefore these are not the focus of NECA's submission.

Purpose

NECA supports the proposed changes to the customer cabling regulatory arrangements and the increase in the current competency requirements for the registration of cabling providers.

NECA supports a regulatory environment that is easy to understand, is not onerous or unnecessarily expensive and promotes compliance and high skill levels, ensuring cabling work is performed to a high standard for the current and emerging customer cabling environment.

NECA has been involved with the NBN in numerous forums, both technical and marketing based, and has an understanding of the scope and complexity of the project. It is with this in mind that NECA makes these comments, and supports any move to enhance the skill base of the cabling industry.

NECA would recommend that a group of stakeholders be brought together to further discuss any proposals the ACMA may be considering as a result of this review.

NECA would also suggest that there be an agreed communication developed to provide the cabling industry with a consistent message about any changes introduced.

There are also other factors to be considered such as the impact of the proposed industry managed quality audit scheme on some of these amendments and additions. This proposed audit scheme has been returned by the ACMA to the ACEA for further revision. NECA is supportive of such a scheme and the likely increase in compliance.

Submission Contact Information

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Issues for consideration

1. The proposed inclusion of structured and optical fibre cabling as base competencies.

We support the inclusion of structured and optical fibre as base competencies to support a high standard for the emerging customer cabling environment, especially in light of customer premises cabling associated with the NBN rollout.

2. Possible gap training requirements for current registered cabling providers who have not completed recognised training on structured cabling and optical fibre cabling installation practices

If the ACMA is to add structured and optical fibre then we agree with the requirement for gap training.

NECA makes the following recommendations in relation to this gap training:

1. Current cablers with structured and optical fibre endorsements should get grandfathered into the new system.
 - This will limit any administrative burden on the industry
 - This will make the changes more acceptable to cablers
2. There should be a minimum of three years transition period.
 - This allows for all cablers with a current three year registration to retain their existing licence preventing additional administrative and financial burden.
3. Some cablers might choose not to undertake the new gap training – there should be a category for them.
4. Gap training must be easily accessible and not become a barrier to compliance.
5. The possibility of undertaking recognition of prior learning in lieu of gap training should be explored.

4. Include the base competencies document into the Arrangements Instruments to specify current base competencies for the registration of cabling providers.

We agree with the move to include the competencies document into the Arrangements Instrument as this simplifies the system.

5. Move the pathways document out of the Arrangements Instrument

We agree with moving the pathways document out of the Arrangements Instrument and therefore allowing it to be updated as required without the need for a legislative amendment, but it still needs to remain under the governance of the ACMA.