COMMUNICATIONS ALLIANCE LTD

STANDARDS AUSTRALIA

ALTERNATE STANDARDS DEVELOPMENT MODELS

COMMUNICATIONS ALLIANCE SUBMISSION
15 MARCH 2023

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Introduction

Communications Alliance welcomes the opportunity to provide this submission in response to the Standards Australia consultation on the proposed Alternate Standards Development Models.

Communications Alliance has been an accredited Standards Development Organisation (SDO) for 24 years, developing Australian Standards for the communications sector which are called up under Australian telecommunications legislation. Communications Alliance and Standards Australia have maintained a strong working relationship over that period, including Standards Australia's participation in our Customer Equipment and Cable Reference Panel, our standing advisory panel, providing the opportunity for our members to exchange regular updates on each other's activities.

About Communications Alliance

Communications Alliance is the primary communications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including carriers, carriage and internet service providers, content providers, platform providers, equipment vendors, IT companies, consultants and business groups.

Its vision is to be the most influential association in Australian communications, co-operatively initiating programs that promote sustainable industry development, innovation and growth, while generating positive outcomes for customers and society.

The prime mission of Communications Alliance is to create a co-operative stakeholder environment that allows the industry to take the lead on initiatives which grow the Australian communications industry, enhance the connectivity of all Australians and foster the highest standards of business behaviour.

For more details about Communications Alliance, see http://www.commsalliance.com.au.

1   General comments

Communications Alliance supports Standard Australia's initiative to explore potential mechanisms to meet the evolving needs of the Government, industry, research & education and sectors, and consumers – the stakeholders - in standardisation in Australia.

In considering any changes, a balance needs to be sought to embrace what is already working effectively in Standards development, against the introduction of new standardisation models which can supplement the existing practices - but importantly, to avoid undermining them. The standardisation process has been finely honed over the last one hundred years the world over. New processes need to be underpinned by the development and application of robust governance structures. The goodwill and branding behind the Australian Standards name need to be carefully nurtured through any proposed change.

The second component of a healthy and vibrant Standards ecosystem is ensuing that Standards are readily available to stakeholders. Although not directly scoped under the consultation, the access to Standards goes hand-in-hand with their development. If they are too slow to come to market or are financially out-of-reach of an average stakeholder, then this, in itself, undermines all the efforts in improving Standards development in the first place.

Communications Alliance is aware that there is concern from certain sectors that Standards have been and are becoming excessively expensive to purchase. Anecdotally, we hear of individuals using superseded Standards to avoid the cost of purchasing current editions. Subscription models may alleviate some of the pain, but if Standards Australia plans to use this as a viable revenue stream, then all care must be taken. It is important that comprehensive market research should be undertaken, with the necessary granularity, to identify the needs all the types users of Standards, to avoid any unwarranted increases to the cost of using Standards.

We understand that the subscription sets that form a part of the Standards Australia sales products are primarily aimed at sole traders. The expansion of this approach to organisations/enterprises to allow for alternate pricing models for other stakeholders may be worth further consideration.

Communications Alliance, as an accredited Standards Development Organisation (SDO), observes that the new proposed pathways by Standards Australia do not directly affect our organisation but we always watch with interest new initiatives being introduced by Standards Australia, for consideration with respect to our Standards development processes. Having said that, they may affect our members, both in the proposed new Standards development approach and with new funding models, so we watch with keen interest. Any proposed changes must be subject to the greatest level of openness and transparency, with adequate consultation and stakeholder engagement, to ensure not to undermine nor weaken the confidence in using Australian Standards.

Also, as a general note, Communications Alliance continues to provide our Standards freely to our members and to the general public, a model that recognises that we and our members invest the vast majority of requisite time and resource needed to develop these Standards, and an approach that is well accepted and appreciated by our stakeholders. Our Standards are called under the Telecommunications Act as enforceable Standards for use by the telecommunications industry.

2   Alternative path for the development of an Australian Standard

Communications Alliance sees the potential benefits for Standards Australia to consider new Standards development models, as long as they are underpinned by the right motivations. To have a responsive, fit-for-purpose process that is inclusive and transparent and that delivers the appropriate outcomes for stakeholders is a worthy goal. Any commercial entity needs to carefully separate commercial and customer imperatives though, to avoid confusing the goal of addressing commercial needs under the pretence of user needs. It is critical not to undermine the confidence of stakeholders with respect to the motives of the SDO and the importance role of Standards in our society.

We understand that the proposed alternative pathway, to be referred to here as the Project Committee pathway, is intended to complement, rather than replace, existing Standards development pathways, particularly when there is no existing committee in the area being considered. From the stakeholder forums, it was noted that no early topics have been identified as candidates for the Project Committee pathway. The pathway, as we understand, is to address new and emerging areas where stakeholder engagement may be scarce and the traditional concept of a broad consensus of stakeholders may be challenging to achieve.

If the argument is that Australia may not have the necessary breadth and depth of representatives in emerging fields, such as in quantum computing, the metaverse, cyber security or artificial intelligence, to note some examples, then the first step would be to join in on the international stage of standardisation, rather than reinventing the wheel. If an actual user need has been identified and there is a time imperative, and there is no Standards activity in the area, then there may be utility in exploring the Project Committee pathway approach. Oversight and approval by an independent and relevant governance body would be critical.
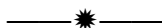
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Care should be taken to
ensure the material used is
from the current version of
the Standard or Industry
Code and that it is updated
whenever the Standard or
Code is amended or
revised. The number and
date of the Standard or
Code should therefore be
clearly identified. If in
doubt please contact
Communications Alliance