

26 July 2013

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Dear Patrick

Re: Draft technical standard AS/NZS 60950.1:2011 Amendment 2013

Communications Alliance welcomes the opportunity to make a submission on the draft technical standard *AS/NZS 60950.1:2011 Amendment 2013* whose purpose is to reference the Australian and New Zealand industry standard Amendment No. 1 to *AS/NZS 60950.1:2011 Information technology equipment – Safety – General requirements*.

In general Communications Alliance supports the principles of the draft technical standard and welcomes its speedy introduction. Our members have noted on occasion the lag between the publishing of an update to the Australian safety Standard and the regulatory Standard taking regulatory effect. Communications Alliance recognises that the ACMA is taking steps to reduce this lag and Communications Alliance welcomes these initiatives.

In addition, Communications Alliance would like to provide the following comments to assist in the drafting of this regulatory technical standard:

- the draft technical standard introduces the new term '*replacement Standard*' which is intended to refer to a Standard that is replacing the Australian/New Zealand Standard, which has in turn been defined as the AS/NZS 60950.1:2011 Standard. We believe this approach introduces the following two problems:
 - it appears to limit the applicability of Clause 6 of the draft technical standard by not addressing future amendments of the safety Standard; and
 - it appears to not adequately cater for future amendments to IEC 62368-1 *Audio/video, information and communication technology equipment - Part 1: Safety requirements* once that Standard replaces the current Australian/New Zealand Standard AS/NZS 60950.1.

To facilitate the introduction of the new term, the following definition is offered for consideration in the draft technical standard:

replacement standard means the Australian/New Zealand Standard as amended from time to time, or another standard as published and amended from time to time which replaces the Australian/New Zealand Standard.

- the draft technical standard broadens the definition of 'manufacture' as it applies to customer equipment to now include customer equipment that has been modified. It is understood that the change has been introduced to align the application of both the draft technical standard and the *Telecommunications Labelling (Customer Equipment and Customer Cabling) Notice 2001 (the TLN)* to modified customer equipment.

The issues still remains that the term 'modified item' or 'modification of equipment' remains undefined, either in the TLN or this draft technical standard. It is generally understood within industry that in this context, a device would be considered to be modified when an engineering change has been introduced to newly manufactured or newly imported equipment that could affect the compliance of that device. It is also understood that only the parts of the device that are affected by the modification would be subject to retesting in this scenario. Other changes and cosmetic changes would not need to be retested, but could be documented in the compliance folder.

- the draft technical standard proposes a one-year phase-in period that allows devices to be tested for compliance against the existing or 'replaced' Standard for a period of one year, commencing from the time a new or amendment Standard takes effect. It is felt that this is adequate time for Amendment 1 to AS/NZS 60950.1:2011 since it was published in 2012.

Communications Alliance has some concern as to whether a one-year phase-in period, instead of the typical two-year period for other customer equipment Standards, would be sufficient time for suppliers to update their compliance arrangements with the introduction of future updates to the safety Standard. A one year phase-in period may not be adequate for the introduction of an Australian adoption of IEC 62368-1 in the future, where a longer period might be more appropriate because of the substantial effort for industry to transition to a completely new standard.

If you have any further questions with regards to the points raised in this submission please contact Mike Johns on (02) 9959 9125.

Yours sincerely



John Stanton
Chief Executive Officer