

**COMMUNICATIONS
ALLIANCE LTD**



DOCUMENT MAINTENANCE POLICY AND PROCESS

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1 INTRODUCTION

All Communications Alliance published documents¹ should be reviewed from time to time. The outcome of the review of a document will be a decision to **revise**, **amend** (in the case of Standards), **reconfirm**, consider available superseded or **withdraw** the published document.

If a revision is recommended, it can be a complete revision or one with limited Terms of Reference. In both cases, revision should only be undertaken when considered necessary.

Most Codes have a paragraph recommending the date by which a review of the Code is recommended.

The review of Australian Standards published by Communications Alliance aligns with that of Standards Australia's policy. The period of validity of a published Standard to be no greater than fifteen years after the Standard's publication and less where the need arises or the Standard is widely used. High usage Standards are generally reviewed on a seven-year basis or when identified by the appropriate Reference Panel or Advisory Group. In practice though the period for review will generally be shorter than this due to changes in technology within the industry.

Generally Guidelines do not have triggers. In the case where Guidelines or Specifications are associated with a Code or Standard, they should be reviewed at the time of the Code or Standard review.

2 COMMUNICATIONS ALLIANCE DOCUMENT REVIEW POLICY

The Communications Alliance policy on the review of documents is:

- (a) during the development of the document, the responsible group (e.g. Working Committee, Working Group, Industry Facilitation Group) is to specify triggers for the formal review of the document it is developing. The group is to formally advise the relevant Reference Panel, Advisory Group or other body of the triggers for a review. These may be a set date, an event, a need for clarification of significant document provision(s) or any other factor(s) the group considers appropriate;
- (b) in the absence of any specified triggers, the review of a published document will occur seven years after publication;
- (c) where Communications Alliance receives a request for a document to be reviewed prior to the above triggers/timeframes, the Reference Panel, Advisory Group or other body will consider the request and recommend to the Board how the request should be dealt with; and
- (d) Reference Panels or Advisory Groups are normally responsible for the review of published documents. Where a document has been developed by or under the auspices of a Reference Panel or Facilitation Group which has been disbanded, Communications Alliance will assign responsibility for the review process.

¹ In the context of this policy and process document, the term 'Communications Alliance document' refers to publications that have been developed under the relevant Communications Alliance body, specifically Industry Codes, Standards, Industry Guidelines, Industry Specifications and Explanatory Notes. These publications are designated as Cxxx, Sxxx, AS/CA Sxxx and Gxxx.

3 COMMUNICATIONS ALLIANCE DOCUMENT REVIEW PROCESS

3.1 Document review initiation

Reference Panels or Advisory Groups will make a decision to review a document based on the Communications Alliance Document Review Policy. Reference Panels or Advisory Groups may choose to conduct industry surveys (as appropriate) to gauge market/industry views as to whether the document should be revised, reconfirmed, considered available superseded or withdrawn.

3.2 Background report

When a document review is required, the relevant Project Manager will prepare a **Background Report** that covers the following inputs, as applicable:

- (a) **Comments received to date**, including comments received from interested parties who made submissions or inquired about the document during the public comment phase or other issues which have been raised in relation to the document since its publication;
- (b) **Regulators' advice**, which may include advice from ACMA, ACCC, TIO, the Privacy Commissioner and others as appropriate;
- (c) **Analysis of number and type of complaints**, including whether complaints were dismissed and the relative severity and impact of breaches (if found) to the industry as a whole;
- (d) **Code Signatory status and comments**, e.g. where the Code is applicable to a particular set of CSPs, whether the majority of these are Signatories;
- (e) **Relevant market, technology and/or legislative changes**;
- (f) **Results of document-specific monitoring activities**;
- (g) **Potential impact on other Communications Alliance projects and publications**; and
- (h) **Results of industry surveys**.

For a straight-forward review (e.g., when the likely outcome is a confirmation), a simple background report can be prepared that does not necessitate the inclusion of all of the above items.

3.3 Review Committee

- 3.3.1 A **Review Committee**, which may be the Reference Panel or Advisory Group, will be formed to discuss the review. The review can occur through a special open meeting (convening a meeting with membership similar to the previous Working Committee or Group or a specially convened meeting open to interested members of the Reference Panel or Advisory Group, as well as other relevant individuals).
- 3.3.2 The **Review Committee** is to consider the Background Report and any other information available and to prepare a **Review Report** with specific recommendations and reasons to:

- (a) **revise** or **amend** the document;
- (b) **reconfirm** the document;
- (c) consider the document **available superseded**; or
- (d) **withdraw** the document.

3.3.3 If the recommendation is to reconfirm the document, then the document is republished demonstrating the currency of that document.

NOTE 1: Standards Australia's policy is to republish a reconfirmed Standard, updating the Standard's designation to indicate the year of reconfirmation.

NOTE 2: Generally Codes and Guidelines are not republished when the recommendation is to reconfirm. A note should be included in the description of the document on the relevant Communications Alliance Publication Report and relevant web page that:

The Code (or Guideline) was reconfirmed in 20YY and the next review is scheduled to occur in 20YY.

3.3.4 If the recommendation is to revise or amend the document, the **Review Report** should also include:

- (a) a recommended timing, either immediately or within a set timeframe;
- (b) Terms of Reference or a broader brief to revise as necessary; and
- (c) a draft Activity Proposal to reflect the decision on the revision.

3.4 Reference Panel decision

3.4.1 Reference Panels and Advisory Groups will use the results of the **Review Report** to determine whether to revise, amend (in the case of Standards), reconfirm, consider available superseded or withdraw the published document. In assessing whether a published document should be revised, the Reference Panel or Advisory Group will also give consideration to the following:

- (a) Reference Panel or Advisory Group work priorities; and
- (b) industry readiness to contribute resources – i.e. for the establishment and resourcing of a Working Committee to undertake the revision.

3.4.2 Once the Reference Panel or Advisory Group has made a decision to revise a published document, a new Working Committee will need to be established (see attached diagram).

4 COMMUNICATIONS ALLIANCE DOCUMENT GUIDANCE AND INTERPRETATIONS

4.1 Inquiries

- 4.1.1 Inquiries regarding Communications Alliance's documents (typically Standards, Industry Codes, Industry Specifications and Industry Guidelines) arise from time to time during the operating life of these publications. Inquiries are generally directed to Communications Alliance or, on occasion, via ACMA or the ACCC and can range from procedural issues and document management through to the application and interpretation of requirements. These Inquiries, generally from industry members, consumers, regulators or other users of these documents, can be broadly categorised as follows:
- (a) **general** - document management and ACIF procedures;
 - (b) **technical** - application or interpretation of a requirement or recommendation;
 - (c) **editorial** - style, structure or editorial corrections; and
 - (d) **regulatory** - application of a made Standard or registered Code under legislation.
 - (e) **Compliance** – compliance checklists and compliance against ACIF Codes.
- 4.1.2 The issue raised in the Inquiry may not necessarily fall under a single category. The nature of the issue is to be evaluated by the appropriate Project Manager to determine the necessary course of action. If further assistance is required, the advice of the relevant Reference Panel, Advisory Group or Working Committee (if active) can be sought.
- 4.1.3 It is acknowledged that the expertise resides with the members of the original Working Committee that developed the document and, to a lesser extent, other industry members and consumers who have either participated or contributed to the development of that document through, for example, public consultation.
- 4.1.4 Typically, Communications Alliance and particularly the Project Managers will have a working knowledge of documents developed within their Reference Panel area, but they are restricted in the level of guidance, particularly regarding interpretations, that can be offered.
- 4.1.5 In the case of AS/CA Standards², Communications Alliance does have an **Expression of Intent Procedure** where the Customer Equipment and Cable Reference Panel can address queries on the intent of existing wording of publications for which the Reference Panel has responsibility. In addition, there may be

² ACA Technical Standards were published by the Australian Communications Authority (the ACA) prior to 1997. On 1 July 2005, the ACA became the Australian Communications and Media Authority (ACMA) who continue to administer these Standards.

queries concerning associated publications (e.g. Guidelines, Supporting Arrangements) where this procedure may assist in identifying future work that may be required for the Reference Panel's consideration.

- 4.1.6 **Communications Alliance does not provide any formal interpretation service for its documents.**
- 4.1.7 Changes to documents resulting from the initial Inquiry can only be initiated in accordance with the **Communications Alliance Document Review Policy**.

4.2 Guidance

- 4.2.1 The Project Manager of the Reference Panel or Advisory Group that has the responsibility for a document can provide certain guidance for that document. This guidance can be provided to explain or clarify certain details relating to the document, but is not intended to constitute a change to the document. Nor is the Project Manager in a position to provide consultancy information.
- 4.2.2 Guidance may be provided on the following.
 - (a) **Development**
 - (i) in accordance with the **Communications Alliance Operating Manual for the development of Industry Codes, Standards and Supplementary Documents and the Establishment and Operation of Advisory Groups** (the **Operating Manual**);
 - (ii) Reference Panel, Advisory Group and Working Committee public information; and
 - (iii) the Project Manager's role.
 - (b) **Structure**
 - (i) style, including format, section and clause numbering; and
 - (ii) mandatory versus voluntary provisions.
 - (c) **Content**
 - (i) scope what the document covers and what it does not cover;
 - (ii) relationship to other Communications Alliance and non-Communications Alliance documents (related Standards, Codes, Guidelines, other industry publications, legislation);
 - (iii) relationship to international publications;
 - (iv) copyright, disclaimers, privacy issues etc.; and
 - (v) referenced documents (what they are and where they can be sourced).
 - (d) **Status and document history**
 - (i) current edition (publication details, version, numbering);

- (ii) source material (as referenced in the publication); and
- (iii) previous editions (publication details).

(e) **Availability and document format**

- (i) electronic copies (Communications Alliance website, Standards Australia);
- (ii) hardcopies (Standards Australia); and
- (iii) electronic file format (Adobe Acrobat).

(f) **Application**

- (i) Standards
 - A. the Standards Development Organisation accreditation by the Standards Accreditation Board;
 - B. voluntary status (either an ACIF or an AS/CA Standard);
 - C. mandatory status (an AS/CA Standard made under s376 of the Telecommunications Act 1997 for Customer Equipment Standards, or s380 of the *Telecommunications Act 1997* for Disability Standards); and
 - D. referenced by the Telecommunications Labelling Notice for compliance and labelling of Customer Equipment.
- (ii) Industry Codes
 - A. voluntary status;
 - B. registration status (under s117 of the Telecommunications Act 1997);
 - C. signatories and the date of sign up;
 - D. the ACIF G514:2003 **ACIF Code Administration and Compliance Scheme**.
- (iii) Industry Guidelines, Industry Specifications and Explanatory Notes
 - A. developed by the appropriate body, generally in line with the **Operating Manual** according to the application of the document.

4.2.3 The Project Manager or Compliance Manager cannot provide:

- (a) legal opinions;
- (b) regulatory interpretations in the case of publications referred to in legislation; or
- (c) compliance/conformance interpretations.

4.3 Implementation and record keeping

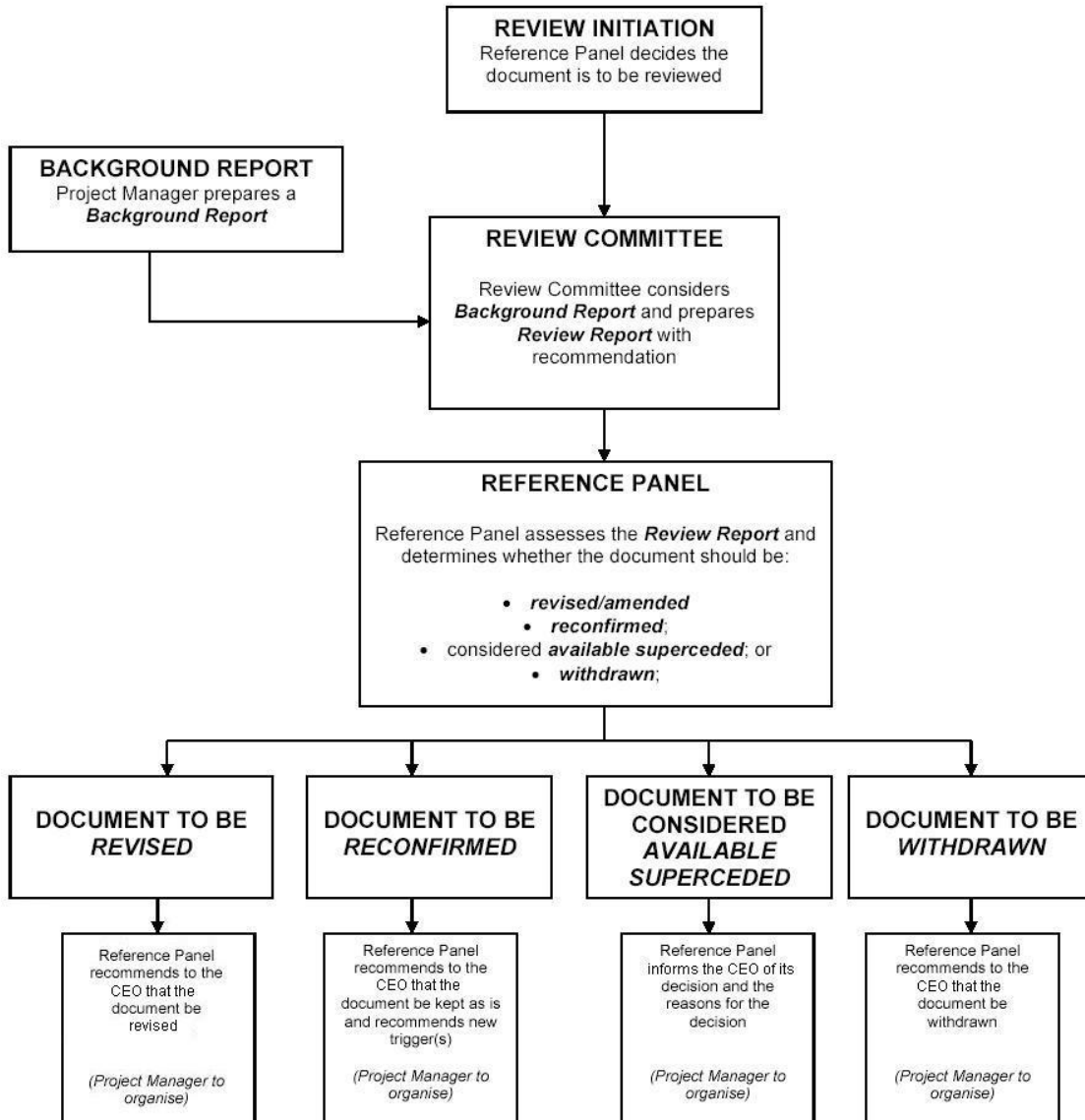
- 4.3.1 Comments on documents are to be dealt with in a timely manner with the appropriate follow-up action as required.
- 4.3.2 For comments that can be addressed by Communications Alliance, the following actions are to be initiated:
- (a) the comment should be addressed within 24 hours of receipt or, for a comment requiring further investigation, the party submitting the comment should be notified that the comment is being addressed;
 - (b) the comment is to be forwarded on to the appropriate body (Reference Panel, Advisory Group, Working Committee, Committee member, industry expert) at the discretion of the Project Manager
 - (i) if a Working Committee is already in the process of revising the document, then the Inquiry is directed to that Working Committee, via the Chair. It is at the discretion of the Working Committee to either handle the Inquiry directly or to address it during the public comment period, if appropriate. If the Inquiry results in a change to the document, then depending on the extent of the change and the stage of the current revision of the document, the existing draft may be changed accordingly or the change may be left until the next revision of the document; and
 - (ii) if a Working Committee does not exist for that particular document, then the Reference Panel (or appropriate Communications Alliance body) is to address the Inquiry itself. If the Inquiry results in the need for a change to the document, then a review is triggered in accordance with the **Communications Alliance Document Review Policy**.
 - (c) resolution or other outcomes from the consideration of the comment are to be forwarded to the party submitting the comment; and
 - (d) the comment and outcomes are to be recorded as appropriate, based on the significance of the comment and the outcomes of the consideration. Comments considered for inclusion in a subsequent review of the document are to be recorded for input into that review's *Communications Alliance Review Process Background Report*.
- 4.3.3 For comments outside the jurisdiction of Communications Alliance, the party submitting the comment should be informed of the appropriate body for dealing with the comment. The following bodies deal with the respective areas as listed:

- (a) the **Department of Infrastructure, Transport, Regional Development, Communications and the Arts** (DITRDCA)³
 - (i) government policy issues
- (b) the **Australian Communications and Media Authority** (ACMA)
 - (i) legislation on Standards for telecommunications, radiocommunications, electromagnetic compatibility (EMC) and electromagnetic radiation (EMR).
 - (ii) legislation on Standards for cabling under the Cabling Provider Rules; and
 - (iii) legislation on Industry Codes.
- (c) the **Australian Competition and Consumer Commission** (ACCC)
 - (i) telecommunications competition and economic regulation; and
 - (ii) consumer protection (especially misleading and deceptive conduct).
- (d) the **Telecommunications Industry Ombudsman** (TIO)
 - (i) by residential and small business customers on telecommunications issues (including privacy).
- (e) the **Australian Human Rights Commission** (AHRC)
 - (i) responsibility for the Disability Discrimination Act 1992 (DDA).
- (f) the **Department of Fair Trading** (in each State)
 - (i) administers legislative framework and rules for fairness in consumers and traders transactions, safeguards consumer rights and advises business and traders on fair and ethical practice (relevant for Customer Equipment issues).
- (g) the **Office of the Australian Information Commissioner**
 - (i) legislation on privacy; and
 - (ii) complaints relating to privacy issues.

4.3.4 The regulator or other body may then in turn seek advice from the appropriate Communications Alliance Reference Panel to aid in the interpretations of the requirements. This process may lead to a change to the document.

³ Or the current Department that manages communications matters.

COMMUNICATIONS ALLIANCE DOCUMENT REVIEW PROCESS



Communications Alliance was formed in 2006 to provide a unified voice for the Australian communications industry and to lead it into the next generation of converging networks, technologies and services.

In pursuing its goals, Communications Alliance offers a forum for the industry to make coherent and constructive contributions to policy development and debate.

Communications Alliance seeks to facilitate open, effective and ethical competition between service providers while ensuring efficient, safe operation of networks, the provision of innovative services and the enhancement of consumer outcomes.

It is committed to the achievement of the policy objective of the Telecommunications Act 1997 - the greatest practicable use of industry self-regulation without imposing undue financial and administrative burdens on industry.



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