

5 August 2015



Shane Keating  
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Dear Shane

**Re: Proposal to change the National Construction Code**

Communications Alliance welcomes the opportunity to provide comments to the Australian Building Codes Board on the proposal to include new requirements for telecommunications pathways and spaces into the National Construction Code (NCC).

Communications Alliance has been working closely with the Government and the ABCB on the draft NCC in the identification and development of the proposed requirements for telecommunications pathways and spaces for inclusion in the next edition of the NCC. We would like to commend the ABCB for taking this initiative and for providing the opportunity for the communications industry to assist in this important piece of work.

In general Communications Alliance is comfortable with the telecommunications pathways and spaces requirements as proposed in the draft NCC that was issued for public consultation, notwithstanding some minor observations included in this submission. Our members were hoping to be able to review the ABCB Regulatory Impact Statement, anticipated for release in July, to understand if there were any other issues to be considered prior to completing the review of the draft NCC. Failing that, we would like to take the opportunity with this submission to reinforce the necessity of including telecommunications pathways and spaces requirements in the NCC for the benefit of customers and the nation. The accompanying NCC Public Comment Draft Response Sheet provides some specific comments on the draft NCC 2016.

**The need for telecommunications pathways and spaces requirements in the NCC**

As highlighted in our earlier submissions, Communications Alliance feels very strongly about having telecommunications pathways and spaces requirements embedded in the NCC. The following summarises the issues at hand:

- buildings need to be designed and constructed to have the capacity to deploy communications services to meet the needs and expectations of users of communications services into the future.
- telecommunications services access into buildings and the provision of adequate spaces and pathways within those buildings is seen as critical.

- the provisioning of spaces and pathways for both carrier cabling and customer cabling should be considered together as they both impact on the service delivery. The consideration of telecommunications needs to be holistic in nature.
- telecommunications services have become a de facto essential service beyond the days of the plain old telephone service and have become high speed, reliable and secure broadband services. As such they have become an integral aspect of the lives of Australians. Having the NCC support the delivery of these services is seen as the logical next step.
- already today retrofitting Multi-Dwelling Units (MDUs) for telecommunications services poses significant problems which are being exacerbated with the rollout of the NBN. The inclusion of appropriate requirements in the NCC to guide future design and construction would go a long way to alleviate these problems.

Communications Alliance would like to emphasise that telecommunications spaces and pathways are a necessity in every class of building. Buildings are living and working spaces and as such must support the technologies required to accommodate the various functions of a building. There are few technologies today that are not connected in one way or another to the Internet. These all go towards providing a healthier and safe environment. Examples of these are back-to-base services such as services for the elderly and assisted services, and remote medical monitoring services.

Having a common set of rules that the building industry can follow help greatly to address the inadequate pathways seen today and alleviate many of the problems being experienced by customers and communication service providers. It is noted that many of the more established developers do employ good practises and we would like to see these practices being adopted by the less experienced developers in the market who do not necessarily have the visibility of what will be needed into the future.

The rationale for adopting this approach is to realise a net economic benefit for individual customers and the nation at large. By incorporating these requirements into the NCC, the initial costs imposed on the industry would be offset through the benefits of long term savings to building owners and increased productivity – savings which will flow on to customers. Specifying the relevant requirements for the building sector in the NCC is seen as the most appropriate means to provide consistency for builders at the design and construction phase. Again it needs to be emphasised that the introduction of these requirements does not represent a net cost increase to customers as long term costs will be reduced by mitigating the necessity for remedial work.

A growing number of reports developed by various government departments and industry all point to the fact that the evolving digital environment is a key factor in driving the Australian economy.

In 2014 PwC published the report 'Deciding with data: How data-driven innovation is fuelling Australia's economic growth' which notes:

'Data-driven innovation is transforming Australia's economy and society, and is emerging as an essential tool to improve our growth and prosperity. In 2013, data-

driven innovation added an estimated \$67 billion in new value to the Australian economy, or 4.4 percent of GDP.<sup>1</sup>

Deloitte's, 'The Connected Continent II - How digital technology is transforming the Australian economy' paper states:

'The estimated value to the Australian economy that accrues to households from accessing the internet is \$75 billion in 2013–14, a real increase of over 20% from the estimate in The Connected Continent 2011.'<sup>2</sup>

These reports highlight the benefits of having ubiquitous access to goods and services, online business and government services, recreational needs, health care, education and reinforces the need to have requirements for telecommunications pathways and spaces in the NCC.

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

Yours sincerely,



John Stanton  
**Chief Executive Officer**

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<sup>1</sup> PricewaterhouseCoopers 'Deciding with data: How data-driven innovation is fuelling Australia's economic growth' <http://www.pwc.com.au/consulting/publications/data-drive-innovation.htm>

<sup>2</sup> Deloitte 'The Connected Continent II. How the internet is transforming the Australian economy' <http://www2.deloitte.com/au/en/pages/economics/articles/connected-continent.html>