

Comments and Proposed Amendments for
DR AS/CA S035:2025
Draft Australian Standard – Requirements for Installation of Temporary Field
Telecommunications Customer Cabling for Defence Purposes

General Comment

This Standard is one of various that need to set the requirements for maintaining infrastructure in both peacetime and operational (strategic and tactical) scenarios. Although Standards generally address the peacetime requirement in detail, they sometimes lack guidance in an operational deployment situation.

In Australia's' current geopolitical strategic environment involving increased competition and rising tensions in the Indo-Pacific region, the risk of involvement in operational activities has elevated. It would be prudent for all Australian Standards, expected to provide extensive authoritative guidance in both warlike and non-warlike environments, to constitute normalised advice between them.

Through normalisation across Standards, deployed personnel (ADF and contractor) can feel confident they are carrying out their technical duties based on accepted comprehensive safety Standards without the fear of retribution once deployment activities have been concluded. Further, Battlespace Commanders can be assured they do not have to spend valuable time trying to second guess what, if any, "technical conversion of communications infrastructure management" may be required to meet post operational accountability requirements. Rather, residual issues left behind as a result of operational contingency can be addressed once hostilities cease and the post war rehabilitation phase is implemented.

Amendments

Recommended amendments are as follows:

Serial	S035:2025 Reference	Proposed Amendment	Reason	Remarks
1.	Page -iii- First para of Introduction	Amend "principle" to read "principal"	Unknown if the authors are saying either: 1) differences in the principles between the two edition versions, or 2) the primary differences between versions. Suspect it is option 2 thus "principal" is correct word usage.	
2.	Page -6- Clause 4.2.14 Temporary Cabling	Suggest addition of wording in brackets "subject to operational constraints specific to the operational deployment" be added at the end of this clause or included as an "Explanatory Note".	Complying with a mandatory 90-day limit in an Area of Operation may not be achievable safely if operational conditions (strategic and/or tactical) limit the ability to upgrade or remove temporary cabling without exposing personnel to an unacceptable risk of loss of life.	
3.	Page -7- Clause 5.2 Note:	Pluralise the sentence by deleting "An" and amending "example" to read "Examples".	Incorrect use of English language as the sentence is referring to multiple examples.	

Serial	S035:2025 Reference	Proposed Amendment	Reason	Remarks
4.	Page -8-	<p>Add Clause 5.5.4 Cable removal / destruction / reuse in-situ on operational deployment</p> <p>Suggest a clause specific to removal and/or reuse in-situ of Temporary cable in an operational area be added. As a minimum, it is suggested the clause needs to cover, in general terms, the acceptability of four scenarios:</p> <ol style="list-style-type: none"> 1. Removal of cabling as part of unit redeployment or departure from the unit site, 2. Destruction of cabling in place subject to operational constraints specific to an operational deployment. The aim being to render the infrastructure inoperable within acceptable operational deployment risk parameters, 3. Leaving the cabling in place for reuse by Defence elements who are also deploying to take over the yet to be vacated site, and 4. Leaving the cabling in place for removal at a later date once it is safe to do so. 	<p>Generally, unit redeployment will include cable removal. However sometimes, the operational plan could involve unit movements into sites before the current occupant has totally vacated. Or, the current occupant may remain in-situ with additional elements co-locating with them to increase the unit's operational capability on site. This amendment supports the case for current site occupants leaving the temporary cabling in place for reuse rather than removal/destruction.</p> <p>Further, the Standard must also take into account that, to minimise battle casualty / death of ADF personnel, cable removal may not be possible due to the tactical situation at the time of site evacuation. Possible options range from cable destruction in place or, in worst case situations, leaving the cable in place as is. This then brings with it a responsibility for parties involved in conflict to address cable recovery (intact cabling or destroyed cable fragmentation / debris) at a later date once it is operationally safe to do so or once conflict resolution is achieved and post war rehabilitation is initiated.</p>	
5.	Page -18- Appendix Para A.2.1	Correct sub-paragraph numbering “(a) (a) (b)” to read “(a) (b) (c)”.	To correct typographical error.	
6.	Page -19- Appendix Para A.2.2	Correct sub-paragraph numbering “(a) (b)” to read “(b) (c)”.	To correct typographical error.	

Conclusion

This Standard provides guidance for warlike and non-warlike situations and comments have been provided along those lines. Its’ ratification prompts the need for a Standards based cross check to ensure guidance compatibility. For example, AS/CA S009 Installation Requirements for Customer Cabling (Wiring rules) also needs attention to normalise cross Standard guidance with AS/CA S035:2025. To avoid industry confusion, maintain cross-standard compatibility and minimise the ongoing effort to maintain S009 to S035 harmonisation, it is suggested that:

- a) A single clause be added to S009 cross referencing AS/CA S035:xxxx as the principal guidance for the installation of temporary field communications customer cabling for Defence purposes, and
- b) AS/CA S035:2025 be added to the S009 Reference List and Bibliography.