

By post and by email at cable-protection@ofca.gov.hk

21 December 2021

Office of the Communications Authority
29/F Wu Chung House
213 Queen's Road East
Wan Chai, Hong Kong
[Attn: Principal Regulatory Affairs Manager (M12)]

Dear Sir/Madam

**Views from The Hong Kong Institution of Engineers
Regarding the Guidelines
on Work near Underground Telecommunications Lines**

On behalf of the Institution, I am pleased to present to you our views and suggestions as set out in the enclosure for your consideration on the captioned subject.

The Institution welcomes the opportunity to work with the Government and offer our expertise and experience on the area of concern if and when it is needed.

Thank you.

Yours faithfully



Davis WONG (Mr)
Director

Enc

CKH/DW/SS

Enclosure

**The Hong Kong Institution of Engineers’
Response to Consultation on the Draft Guidelines
on Work near Underground Telecommunications Lines**

Following the passing of the Telecommunications (Amendment) Bill 2021, amendments to the Telecommunications Ordinance (Cap. 106) (the “Ordinance”) were then gazetted in late-October 2021. The Hong Kong Institution of Engineers (“HKIE”) welcomes and fully supports the proposed *Guidelines on Work near Underground Telecommunications Lines* (the “Guidelines”) by the Office of the Communications Authority (“OFCA”), and believes it will help protect Hong Kong’s important telecommunications infrastructures. The HKIE would like to provide following suggestions on the proposed Guidelines for the OFCA’s consideration:

2. In reference to Clause 11(d) of Section E *Obligation of Fixed Network Operators* and Appendix 3 of the proposed Guidelines, tracer wire or properly grounded equivalent is to be installed to enable detection of their installed telecommunications lines in certain occasions. If the telecommunications lines are fabricated with a metallic conductor/wire, e.g. copper wire, steel tension member, aluminum foil and corrugated steel tape longitudinally warped along cables, to propagate the signal for detection, the installation of the tracer wire may not be necessary.
3. In Clause 62 of Section G(4) *Reporting damage to underground telecommunications lines*, it is recommended that advice on the reporting and handling procedures for both the working party and the fixed network operators (“FNO”) be given, suggesting for example the FNOs shall follow a reporting procedure before the restoration work upon receipt of the damage notice from the working party.
4. Under item 2 *Interpretation* of Appendix 1 *Legislation*, “underground telecommunications line” is interpreted as a telecommunications line located below ground level in any land that is not seabed. The OFCA is suggested to consider including those telecommunication lines within tunnels and bridges in the interpretation.
5. Other than the above comments with specific reference points, the Institution also suggests the OFCA to consider the role and responsibility of different parties in relation to work near underground telecommunications lines. It is suggested that the working party should provide site access assistance for the affected FNO staff for the remedy works in case of service impact found.
6. When the telecommunication cables are optical fibre cables, there will be no radio wave/electrical current found and the competent person should be reminded of the scenario. In such case, the competent person could then be given access to the FNO’s manholes to put on the coupler to introduce 50Hz RF frequency to the metallic

amour cable jacket by non-destructive method.

7. In the event of unavoidable cable diversion of telecommunications cables due to the road or construction works planned by the working party, the working party should provide the affected FNO an advance notice of no less than 21 days for preparation.

8. It is important to ensure no duct bore is damaged during construction. If the duct bores are damaged or cracked without cable damage, and even if there is no instant service impact, the duct blockage could later affect or jeopardise the FNO's emergency maintenance by directly or indirectly causing unplanned outage. It is therefore recommended that, after the construction works and before backfilling, the working party makes clear records evidenced with photos to show that there is no duct bore damaged during the construction period. This should provide better protection for all parties involved in case of dispute.