## TC716 draft comments:

## 716.1 Scope

This part of IEC 60364 specifies requirements in electrical installations for the distribution of ELV DC range power using balanced, information technology cables and accessories primarily designed for data transmission, as specified in terms of a Category within the reference implementations of ISO/IEC 11801-1 using power feeding equipment in accordance with IEC62368-3.

Requirements are included for the design, erection, and verification of telecommunications infrastructure for the purpose of both telecommunications and distribution of ELV DC power feeding. In addition requirements are included for use of existing telecommunications infrastructure for distribution of ELV DC power.

The power delivery systems include, but are not restricted to, the Power over Ethernet systems specified by IEEE 802.3.

Comment: Category should be change to Class. The reference to 11801-1 should be dated (what is the correct date?). IEEE 802.3 notes that PoE systems include the PoDL systems defined in Clause 104 that operate on a single pair. 11801-1 at present only covers the 2-pair and 4-pair systems define in 802.3 Clause 33 and Clause 145.

## 716.433.1.101 Protection against thermal effects including overcurrent

The protection against thermal effects and overcurrent shall be achieved by at least one of the three following principle measures:

- use of a protective device to disconnect any overcurrent in the circuit conductors
- designing the circuit so as to prevent an overcurrent to arise
- limitation of overcurrent by the characteristics of supply

Overload protection shall be provided by limitation of the power supply for all parallel sources of the power supply devices. The disconnection in case of overload shall be within 1 s. The circuit shall not reset automatically.

Comment: This one is still being debated. The problem is it can be interpreted. Typical PoE systems have a fused overcurrent/overload protection circuit that will not reset automatically (or ever) but also contain the PSE monitored Icut, Ilim circuits that do reset automatically. Would this design conform to the requirements of 716.433.1.101?

716.521 Types of wiring system 716.521.101

Information technology cables used for the distribution of DC power shall comply with Category 5, Category 6, Category 6A, Category 7A, Category 8.1 or Category 8.2

Comment: The title of this section is Types of Wiring System but the text addresses components and not the system. [How do we fix this?]

716.523 Current carrying capacities 716.523.1.101

The maximum operating temperature for cables complying with ISO/IEC 11801-1 requirements for Category 5, Category 6, Category 6A, Category 7, Category 7A, Category 8.1 or Category 8.2 shall not exceed 60°C.

Comment: The maximum operating temperature is defined in 11801-1, no need to redefine here. Additionally, the requirement here ignores the MICE 2&3 environments.

## **NEC Public Comments**

250.119 Identification of Equipment Grounding Conductors.

Unless required elsewhere in this Code, equipment grounding conductors shall be permitted to be bare, covered, or insulated. Individually covered or insulated equipment grounding conductors shall have a continuous outer finish that is either green or green with one or more yellow stripes except as permitted in this section. Conductors with insulation or indi- vidual covering that is green, green with one or more yellow stripes, or otherwise identified as permitted by this section shall not be used for ungrounded or grounded circuit conductors.

Exception No. 1: Power-limited Class 2 or Class 3 cables, power-limited fire alarm cables, or communications cables containing only circuits operating at less than 50 volts where connected to equipment not required to be grounded in accordance with 250.112(I) shall be permit-ted to use a conductor with green insulation or green with one or more yellow stripes for other than equipment grounding purposes.

[for reference: 250.112 Specific Equipment Fastened in Place (Fixed) or Connected by Permanent Wiring Methods. Except as permit-ted in 250.112(F) and (I), exposed, normally non–current- carrying metal parts of equipment described in 250.112(A) through (K), and normally non–current-carrying metal parts of equipment and enclosures described in 250.112(L) and (M), shall be connected to an equipment grounding conductor, regardless of voltage.

(I) Remote-Control, Signaling, and Fire Alarm Circuits.

Equipment supplied by Class 1 circuits shall be grounded unless operating at less than 50 volts. Equipment supplied by Class 1 power-limited circuits, by Class 2 and Class 3 remote- control and signaling circuits, and by fire alarm circuits shall be grounded where system grounding is required by Part II (**System Grounding**) or Part VIII (**Direct-Current Systems**) of this article. ]

Adhoc recommended Public Comment to the rejection of PI 1743: The addition of PoE to 725.144 in the 2017 NEC has the unintended consequence that green conductors in a Category cable must be equipment ground. Exemption No. 1 allows green conductors to not be equipment ground but only for circuits of less than 50V. Some IEEE compliant standardized PoE systems have a minimum port voltage of 50V, and all of them allow port voltage up to 57V. Therefore, IEEE compliant PoE does not qualify for the exemption and this makes millions of PoE installations violate code. Request to fix the exemption by changing 50V to 60V.

725.144

Nominal Current

Comment: Recommend that IEEE 802.3 reiterate that the term 'Rated' alone is the wrong term to use to describe the current in a PoE system. IEEE 802.3 has no opinion on what the term should be except that it's not simply 'rated current' – TBD based on outcome of NEC PoE TG #2