Dear Mr. Earley,

Experts in the IEEE 802.3 Working Group have reviewed the Second Revision No. 4564-NFPA 70-2015 [Section, 840.160]. We remain concerned about the technical justification for the proposed changes, pursuant to our liaison of July 2015 and comments submitted on the second draft.

1 This document solely represents the views of the IEEE 802.3 Working Group, and does not necessarily represent a position of the IEEE, the IEEE Standards Association, or IEEE 802.
Additionally, we are now concerned that a power limit of 60 watts or less does not inherently limit the maximum ampacity of communications cables powering circuits, and therefore is not a sufficient criteria to be used as the basis for excluding communications cables powering circuits from complying with 725.144 ampacity tables. For example, this could allow higher than intended ampacities in other systems, which might use lower voltages.

IEEE Std 802.3 Clause 33 DTE Power over MDI, the only standardized application referred to as Power over Ethernet or PoE, provides managed power to communications equipment consistent within SELV and LPS limits at maximum ampacities under 0.5 amps/conductor, and provides for current monitoring and overcurrent shutoffs.

We appreciate the NFPA’s consideration of our comments, concerns, and commitment to an open standards process.

Sincerely,
David Law
Chair, IEEE 802.3 Ethernet Working Group