

Instruct the IEEE 802.3 Ethernet Working Group Executive Secretary to submit a comment through the NFPA public comment process as follows:

[1] Mark the entire article 840.160 'Powering Circuits' section VI as deleted.

[2] Submit the following comment in support of this action:

Statement of Problem and Substantiation:

For the following reasons, the IEEE 802.3 Working Group believes that this change to the code is premature and should be deferred to the 2020 code revision cycle. This delay should permit sufficient time for all interested and affected parties to review and comment.

1. Lack of LP Cable specification

At the date of the written comment submission deadline, 21 August 2015, the specifications and availability of the referenced LP cabling was not, to the best of our knowledge, publicly available. This fact alone makes it impossible to provide adequate technical review of this new type of cabling, thus effectively precluding public input.

2. Insufficient Technical Justification

At the date of the written comment submission deadline, 21 August 2015, no publicly-available technical data had been provided detailing the testing methodologies used as the basis for the proposed changes. There is insufficient technical justification provided for the change to require the use of LP cabling.

In addition, no technical data has been provided showing that when operating a communications circuit over a communications type cable under the established guidelines that a safety condition is created or exists.

This comment is being submitted on behalf of the IEEE 802.3 Ethernet Working Group.