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30 June, 2009

The Chairperson
Victorian Law Reform Commission
GPO Box 4637
Melbourne VIC 3001

Dear Sir,

Re: The Victorian Law Reform Commission – Surveillance in Public Places: Consultation Paper.

I refer to the Surveillance in Public Places Consultation Paper and offer this "public" comment.

The Consultation Paper refers to Australian Standards and I note it is proposed in clause 6.71.6 on page 142 that "The independent regulator could review Australian Standards relating to design and use of CCTV and other surveillance technologies".

There are a number of direct and indirect methods for the review of Australian Standards and, in relation to the correct CCTV Standards process; the independent regulator should contact the Standards Australia EL51 project manager.

I am the Chair of the Non Broadcast Television Committee which includes the CCTV Sub Committee. My colleague, Mr Vlado Damianovski, the Chair of the CCTV Sub Committee and I are willing to cooperate where possible with the independent regulator in relation to the Australian CCTV Standards.

The Standards Australia CCTV Standards are considered a minimum standard for the vast majority of Government and commercial CCTV projects and currently include the following standards:

AS 4806.1-2006 - Closed Circuit Television (CCTV)–Part 1: Management and operation:

- Management and operation includes chapters on; principals and management of the CCTV system, procedures, personnel, CCTV control room, effective response, privacy and disclosure issues, recorded material management, documentation, licences and CCTV signage. There are appendices on staff recruitment and selection and a summary of current Australian Legislation for all states and territories.

AS 4806.2-2006 - Closed Circuit Television (CCTV)–Part 2: Application guidelines:

- Application guidelines include chapters on; general CCTV considerations, system design criteria, minimum standards for identification and recognition, objective test plan, system installation, camera poles, commissioning and handover, preventative maintenance, licences and signage. There are appendices on abbreviations and terminology, objective testing techniques, objective tests and measurements using a test chart, objective tests and measurements using a test pattern generator and test targets.

AS 4806.3-2006 - Closed Circuit Television (CCTV)–Part 3: CCTV PAL signal timings and levels:

- PAL signal timings and levels includes video signal timings from the Australian Broadcasting and Media Authority Technical Planning Guidelines and video signal level variables for CCTV systems which have been determined from many tests over many years.

AS 4806.4-2008 - Closed Circuit Television (CCTV)–Part 4: Remote video:

- This Standard sets out requirements and recommendations for the design, installation, commissioning, operation and remote monitoring of the following:
 - a) Remotely monitored detector-activated alarm verification CCTV systems.
 - b) Remotely monitored interactive video management CCTV systems.
 - c) Remotely monitored CCTV surveillance systems.

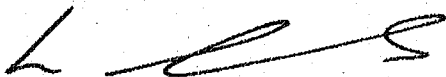
Also includes:

1. Standards and legislation relevant to CCTV systems and equipment are listed in Appendix A.
2. Information on choice of technology is given in Appendix B.

A new CCTV Standard which covers digital and networked CCTV systems is currently in development. This CCTV standard will allow CCTV and IT personnel involved in networked CCTV systems to understand each others technologies.

If you require more information, please contact me.

Sincerely,



Les Simmonds

Managing Director
Les Simmonds and Associates Pty Ltd