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REPUBLICKA AGENCIJA ZA ELEKTRONSKE KOMUNIKACIJE
Branislav Jovalekic
Beograd, Visnjiceva 8

Predmet: Opste mišljenje o nacrtu *Uputstva o označavanju optičkih kablova*

V e z a : Javne konsultacije o nacrtu *Uputstva o označavanju optičkih kablova* (RATEL, 18.11.2011)

http://www.ratel.rs/upload/documents/javne_rasprave/Nacrt%20uputstva%20o%20oznacavanju%20optickih%20kablova.pdf

Postovani kolega Jovalekicu,

Konacno se neko setio u RATEL-u da pripremi prvi tehnicki propis iz oblasti savremenih elektromagnetnih sistema - optickih sistema. Zasto se pocelo sa (posebnim) tehnickim propisom o oznacavanju kablova, a ne sa nekim opstijim propisom iz ove oblasti - ostaje za mene "velika tajna" (jer nema ni obrazlozenja uz ovaj propis).

Mislim da odredba clana 8. stav 1. tacka 1. Zakona o elektronskim komunikacijama na moze da predstavlja pravni osnov (ovlascenje) za donosenje ovog propisa.

Skrecem Vam paznju *da clan 15. stav 4. Zakona o drzavnoj upravi glasi:*

"Uputstvom se određuje način na koji organi državne uprave i imaoci javnih ovlašćenja izvršavaju pojedine odredbe zakona ili drugog propisa."

Posebno misljenje o ovom uputstvu nemam, zato sto nisam strucnjak za ovu oblast (iako me ona zivo interesuje).

Iskreno,
Dejan Popovic

Beograd, 18. novembar 2011.

Dejan R. Popovic, dipl. inz.
Beograd, Stevana Sremca 18

REPUBLICKA AGENCIJA ZA TELEKOMUNIKACIJE (RATEL)
Branislav Jovalekic
Beograd, Visnjiceva 8

MINISTARSTVO KULTURE, INFORMISANJA I INFORMACIONOG DRUSTVA (MKIID)
Sektor za elektronske komunikacije
Vlajkoviceva 3

Postovani gospodine Jovalekicu,

1. Povodom RATEL-ovih javnih konsultacia o nacrtu *Uputstva o označavanju optičkih kablova* od 18.11.2011. godine (*http://www.ratel.rs/upload/documents/javne_rasprave/Nacrt%20uputstva%20o%20oznacavanju%20optickih%20kablova.pdf),* istog dana dostavio sam Vam opste misljenje o nacrtu ovog uputsrva. Ono glasi:

"Konacno se neko setio u RATEL-u da pripremi prvi tehnicki propis iz oblasti savremenih elektromagnetnih sistema - optickih sistema. Zasto se pocelo sa (posebnim) tehnickim propisom o oznacavanju kablova, a ne sa nekim opstijim propisom iz ove oblasti - ostaje za mene "velika tajna" (jer nema ni obrazlozenja uz ovaj propis).

Mislim da odredba clana 8. stav 1. tacka 1. Zakona o elektronskim komunikacijama na moze da predstavlja pravni osnov (ovlascenje) za donosenje ovog propisa.

Skrecem Vam paznju da clan 15. stav 4. Zakona o drzavnoj upravi glasi:

"Uputstvom se određuje način na koji organi državne uprave i imaoci javnih ovlašćenja izvršavaju pojedine odredbe zakona ili drugog propisa."

Posebno misljenje o ovom uputstvu nemam, zato sto nisam strucnjak za ovu oblast (iako me ona zivo interesuje)."

2. Vi ste mi odmah poslali sledeci odgovor:

"Drago mi je da ste čitali uputstvo I dali svoje mišljenje. Potrebu za ovim uputstvom su izrazili proizvođači optičkih kablova u Srbiji, jer stare oznake ne mogu da odgovaraju savremenim konstrukcijama optičkih kablova. Na ovaj način je pokušano da se taj urgentni problem reši."

Posle Vaseg odgovora zamislio sam se i nasao u cudu, jer sam znao da vec vise desetina godina Institut za standardizaciju Srbije (bivsi Savezni zavod za standardizaciju) priprema i objavljuje, u okviru nize navedenih standarda za optičke provodnike, kablove, pribor i sisteme, i sledece standarde za kablove sa optickim vlaknima:

http://www.iss.rs/tc/?national_committee_id=585

http://www.iss.rs/standard/index.php?national_committee_id=585&item_from=60

http://www.iss.rs/standard/index.php?national_committee_id=585&item_from=80

http://www.iss.rs/standard/index.php?national_committee_id=585&item_from=100

Da li se neki od navedenih standarda odnosi i na savremeno oznacavanje tih kablova, to nisam mogao da utvrdim.

3. Bilo kako bilo, nije jasno zasto RATEL i MKID nisu do sada primenjivali odredbe clana 44. Zakona o elektronskim komunikacijama (ZEK). One glase:

*"Ministarstvo, na predlog Agencije, donosi **tehnički propis** kojim propisuje zahteve za pojedine vrste elektronskih komunikacionih mreža, pripadajućih sredstava, elektronske komunikacione opreme i terminalne opreme.*

Ako je propisom iz stava 1. ovog člana utvrđeno da ocenjivanje usaglašenosti sprovodi telo za ocenjivanje usaglašenosti, Ministarstvo imenuje to telo u skladu sa zakonom kojim se uređuju tehnički zahtevi za proizvode i ocenjivanje usaglašenosti.

Agencija može biti imenovana kao telo za ocenjivanje usaglašenosti, u skladu sa zakonom."

Valja primetiti da se na starim internet stranama Uprave za Digitalnu agendu (http://www.mtid.gov.rs/dokumenti/zakoni-propisi/) jos nalaze *Zakon o tehnickim zatevima za proizvode i ocenjivanje usaglasenosti* (http://www.pks.rs/LinkClick.aspx?fileticket=1P0KnUf5URw%3D&tabid=145&mid=588&language=sr-Latn-CS) i tehnicki propisi (pravilnici, odnosno standardi) doneti na osnovu ovog zakona, dok na novim internet stranama UZDA-e (http://www.uzda.gov.rs/) i MKIID-a (http://www.kultura.gov.rs/) pomenutog zakona i pravilnika nigde nema. Zasto?

4. *Zakljucak*. Na osnovu citirane ovlascujuce odredbe ZEK-a moguce je legano doneti tehnicke propise (ukljucujuci standarde) kojima se propisuju zahtevi za pojedine (prakticno sve) vrste elektronskih komunikacionih mreza, pripadajucih sredstava, elektronske komunikacione opreme i terminalne opreme. Da nisu mozda odredbe st. 2. i 3. ovog clana prepreke za primenu stava 1?

Iskreno,

Dejan Popovic

Beograd, 19. novembar 2011.

P. S. 1 - Da bih proverio koliko sam pogresio ili bio u pravu u prvom stavu moga opsteg misljenja, pregledao sam "savremene" preporuke ITU-T. Pronasao sam sledece preporuke iz seija G i L (iz druge serije nisam mogao da izdvojim preporuke koje se odnose iskljucivo na kablove sa optickim vlaknima):

- G.650-G.659 : Optical fibre cables
  - G.650.1: Definitions and test methods for linear, deterministic attributes of single-mode fibre and cable
  - G.650.2: Definitions and test methods for statistical and non-linear related attributes of single-mode fibre and cable
  - G.650.3: Test methods for installed single-mode optical fibre cable links
  - Withdrawn: G.651 - Characteristics of a 50/125 µm multimode graded index optical fibre cable
  - G.651.1: Characteristics of a 50/125 µm multimode graded index optical fibre cable for the optical access network
  - G.652: Characteristics of a single-mode optical fibre and cable
  - G.653: Characteristics of a dispersion-shifted, single-mode optical fibre and cable
  - G.654: Characteristics of a cut-off shifted, single-mode optical fibre and cable
  - G.655: Characteristics of a non-zero dispersion-shifted single-mode optical fibre and cable
  - G.656: Characteristics of a fibre and cable with non-zero dispersion for wideband optical transport
  - G.657: Characteristics of a bending-loss insensitive single-mode optical fibre and cable for the access netwo

cific search Roadmap search

- A series
- D series
- E series
- F series
- G series
- H series
- I series
- J series
- K series
- L series
- M series
- N series
- O series
- P series

- L series: Construction, installation and protection of cables and other elements of outside plant
  - L.1: Construction, installation and protection of telecommunication cables in public networks
  - L.2: Impregnation of wooden poles
  - L.3: Armouring of cables
  - L.4: Aluminium cable sheaths
  - L.5: Cable sheaths made of metals other than lead or aluminium
  - L.6: Methods of keeping cables under gas pressure
  - L.7: Application of joint cathodic protection

- Q series
- R series
- S series
- T series
- U series
- V series
- X series
- Y series
- Z series

- L.8: Corrosion caused by alternating current
- L.9: Methods of terminating metallic cable conductors
- L.10: Optical fibre cables for duct and tunnel application
- L.11: Joint use of tunnels by pipelines and telecommunication cables, and the standardization of underground duct plans
- L.12: Optical fibre splices
- L.13: Performance requirements for passive optical nodes: Sealed closures for outdoor environments
- L.14: Measurement method to determine the tensile performance of optical fibre cables under load
- L.15: Optical local distribution networks – Factors to be considered for their construction
- Withdrawn: L.16 - Conductive plastic material (CPM) as protective covering for metal cable sheaths
- L.17: Implementation of connecting customers into the public switched telephone network (PSTN) via optical fibres
- L.18: Sheath closures for terrestrial copper telecommunication cables
- L.19: Multi-pair copper network cable supporting shared multiple services such as POTS, ISDN and xDSL
- L.20: Creation of a fire security code for telecommunication facilities
-
- L.22: Fire protection
- L.23: Fire extinction – Classification and location of fire extinguishing installations and equipment on premises
- L.24: Classification of outside plant waste
- L.25: Optical fibre cable network maintenance
- L.26: Optical fibre cables for aerial application
- L.27: Method for estimating the concentration of hydrogen in optical fibre cables
- L.28: External additional protection for marinized terrestrial cables
- L.29: As-laid report and maintenance/repair log for marinized terrestrial cable installation
- L.30: Markers on marinized terrestrial cables
- L.31: Optical fibre attenuators
- L.32: Protection devices for through-cable penetrations of fire-sector partitions
- L.33: Periodic control of fire extinction devices in telecommunication buildings
- L.34: Installation of Optical Fibre Ground Wire (OPGW) cable

- L.35: Installation of optical fibre cables in the access network
- L.36: Single-mode fibre optic connectors
- L.37: Optical branching components (non-wavelength selective)
- L.38: Use of trenchless techniques for the construction of underground infrastructures for telecommunication cable installation
- L.39: Investigation of the soil before using trenchless techniques
- L.40: Optical fibre outside plant maintenance support, monitoring and testing system
- L.41: Maintenance wavelength on fibres carrying signals
- L.42: Extending optical fibre solutions into the access network
- L.43: Optical fibre cables for buried application
- L.44: Electric power supply for equipment installed as outside plant
- L.45: Minimizing the effect on the environment from the outside plant in telecommunication networks
- L.46: Protection of telecommunication cables and plant from biological attack
- L.47: Access facilities using hybrid fibre/copper networks
- L.48: Mini-trench installation technique
- L.49: Micro-trench installation technique
- L.50: Requirements for passive optical nodes: Optical distribution frames for central office environments
- L.51: Passive node elements for fibre optic networks – General principles and definitions for characterization and performance evaluation
- L.52: Deployment of Passive Optical Networks (PON)
- L.53: Optical fibre maintenance criteria for access networks
- L.54: Splice closure for marinized terrestrial cables (MTC)
- L.55: Digital database for marine cables and pipelines
- L.56: Installation of optical fibre cables along railways
- L.57: Air-assisted installation of optical fibre cables
- L.58: Optical fibre cables: Special needs for access network
- L.59: Optical fibre cables for indoor applications
- L.60: Construction of optical/metallic hybrid cables
- L.61: Optical fibre cable installation by floating technique
- L.62: Practical aspects of unbundling services by multiple operators in copper access networks

- L.63: Safety procedures for outdoor installations
- L.64: ID tag requirements for infrastructure and network elements management
- L.65: Optical fibre distribution of access networks
- L.66: Optical fibre cable maintenance criteria for in-service fibre testing in access networks
- L.67: Small count optical fibre cables for indoor applications
- L.68: Optical fibre cable maintenance support, monitoring and testing system for optical fibre cable networks carrying high total optical power
- L.69: Personal digital assistant requirements and relevant data structure for infrastructure and network elements management
- L.70: Managing active electronics in the outside plant
- L.71: Design, construction, and installation of network cables for broadband access including metallic networks connected to optical fibre networks
- L.72: Databases for optical access network infrastructure
- L.73: Methods for inspecting and repairing underground plastic ducts
- L.74: Maintenance of cable tunnels
- L.75: Test, acceptance and maintenance methods of copper subscriber pairs
- L.76: Copper loop requirements for various technologies including indoor and structured cabling
- L.77: Installation of optical fibre cables inside sewer ducts
- L.78: Optical fibre cable construction for sewer duct applications
- L.79: Optical fibre cable elements for microduct blowing-installation application
- L.80: Operations support system requirements for infrastructure and network elements management using ID techonology
- L.81: Monitoring systems for outside plant facilities
- L.82: Optical cabling shared with multiple operators in buildings
- L.83: Low impact trenching technique for FTTx networks
- L.84: Fast mapping of underground networks
- L.85: Optical fibre identification for the maintenance of optical access networks
- L.86: Considerations on the installation site of branching components in passive optical networks for fibre to the home
- L.87: Optical fibre cables for drop applications
- L.88: Management of poles carrying overhead telecommunication lines

- L.1000: Universal power adapter and charger solution for mobile terminals and other hand-held ICT devices
- L.1400: Overview and general principles of methodologies for assessing the environmental impact of information and communication technologie