

**Board of Electricity  
Rulemaking Hearing  
MN Rules 3800  
Tuesday, February 17, 2009  
9:30 A.M.  
Department of Labor and Industry  
443 Lafayette Road North, St. Paul, Minnesota 55155**

**Satellite Broadcasting and Communications Association of America (SBCA)**

Good morning/afternoon, I am Lisa Volpe McCabe, Director of Public Policy and Outreach for the Satellite Broadcasting and Communications Association of America (SBCA). SBCA is the national trade organization representing all segments of the satellite industry.

SBCA supports reasonable regulation and training of residential satellite systems installers. It, along with industry leaders, has developed the SBCA National Standards and Testing Program, providing an industry-endorsed benchmark of knowledge for the installation of satellite products and services. The program aims to ensure that installers are properly installing systems, improving service to consumers, and complying with the codes and regulations of states.

SBCA prides itself on the leadership we take to develop industry standards and to provide training for our members. Typical technicians go through a 4 week training course which includes both classroom and field supervision. Coursework includes:

- System technology
- Dish placement
- Troubleshooting
- NEC grounding compliance
- Customer education
- Workers safety
- State/local code compliance???

Uptraining classes are available in classroom and internet formats. These courses typically focus on new technology and customer care. Upon completing training all students must take and pass SBCA's national certification program.

Our course has been used as a basis to develop low voltage licensing requirements in Connecticut, Rhode Island, and Louisiana.

Also, SBCA has representatives on the code making panel of the National Fire Protection Associations (NFPA) which writes and administers the National Electric Code (NEC). This enables the industry to stay current on the latest code changes and more effectively train our technicians.

Lastly, Satellite providers also perform random inspections of recent installations to ensure compliance to industry and local requirements

That being said, SBCA views the mandated continuing education requirement of registered, unlicensed workers (8 hrs.) as burdensome and overreaching because the educational requirements are beyond the scope of work performed by satellite installers. The satellite industry makes sure its technicians are trained to do the required work at the outset and offers its own curriculum and training program. An education requirement that does not meet the scope of work will not benefit the technician or the consumer.

**Unlicensed workers:**

The unlicensed worker continuing education requirement falls outside the scope of MN Stat. 326B. Unlicensed workers are not licensed. The intention of registering unlicensed workers is to document experience an individual has gained in an area for future use if that individual chooses to become licensed in that area. The category of “unlicensed worker” is not an area of licensure therefore it should not have a continuing education requirement. Requiring unlicensed workers to complete continuing education coursework goes beyond the authority of the Minnesota Statute and, quite frankly, does not make sense.

If a determination is made that Minnesota Statute does allow the Board to require unlicensed workers to take continuing education credits, eight hours in areas unrelated to satellite systems installation is overreaching.