Adam Nielsen

Yeronga, QLD, 4104

Australian Communications and Media Authority

https://www.acma.gov.au/consultations/2024-09/proposal-amend-ecs-determination

**RE: Proposal to amend the ECS Determination**

Dear ACMA,

I wish to voice my concerns about the impending 3G shut down. I regularly travel to rural areas in Queensland, and until recently had 2G and 3G service only in these locations. I have a number of safety devices with me, including two-way radios, a backup mobile phone in case my primary one fails, and a PLB (Personal Locator Beacon).

One of the most commonly used devices is my backup phone, as my primary phone often goes flat when I have been out all day, and I can switch to the backup phone to keep in contact with friends and family to let them know I am safe.

My backup phones are all older handsets, 4G capable, but they do not support VoLTE. While it would be inconvenient for me to lose voice service, I predominantly use data-based messaging services (such as XMPP and Facebook Messenger) to keep in contact, and these will continue to work after the 3G shut down.

However now I have learned that my devices are likely to be excluded from the network because they are unable to make emergency calls over LTE!

I do not need to make emergency calls over LTE as I have my primary phone for this, not to mention the two-way radios, and PLB for true emergencies. However as I regularly rely on the 4G non-VoLTE phones for important but non-emergency communications (mainly to let family members know that there is no need to raise any alarm) I am concerned that these will be blocked after the shut down.

For example if I get a flat tyre on my way home and I cannot let anyone know I am running late, there is risk that my family will assume something has gone wrong and will call the emergency services unnecessarily, wasting valuable resources.

There needs to be an “opt out” of the block, where you can acknowledge that your phone cannot make emergency calls and that you have made other arrangements for emergency situations.

Personally I would rather see a law passed that if telecommunication companies wish to turn off 3G service at such short notice, they should be required to cover the costs of replacing 3G-only equipment, so everyday Australians are not left high and dry without service. This seems to be the fairest option to me, given that the 3G shutdown is entirely unnecessary.

Sincerely,

Adam Nielsen