

**4 October 2024**

The Manager  
National Interests Section  
Australian Communications and Media Authority

Dear National Interest Section Manager,

**Emergency Call Service Determination Proposed amendments to ensure mobile phones can access the Triple Zero (000) emergency call service.**

Everyday Mobile from Woolworths (EM) is a mobile virtual network operator (MVNO) in Australia owned and operated by Woolworths Limited. It leverages the Telstra Wholesale Mobile Network, providing coverage to over 98.8% of the Australian population.

EM supports the Government's commitment to ensuring all people residing or travelling within Australia have access to the Triple Zero (000) emergency call service via a mobile phone and will continue to provide its support in this area. While the policy intent of this approach is understandable, in reality, Bring Your Own Device (BYOD) carriage service providers are not in a position to implement, enforce and manage such a determination.

EM is not in a position to identify whether the mobile phone that a customer currently or proposes to use to access the Telstra network is configured to be able to access the Triple Zero (000) emergency call service. As a seller of SIM-Only and Prepaid services (operating as a BYOD carriage service provider) EM does not sell mobile phones and thus cannot restrict or identify mobile phones unable to access Triple Zero (000) emergency call service. Customers are also able to use our SIM-Only or Prepaid services with devices that are unable to make calls, such as iPads and smart watches.

Customers also regularly interchange their devices throughout their use of services with EM and do not / would not provide an update of what device is being used at any one point in time. This can occur when a customer changes phones, most commonly after purchasing a new phone. EM services are provided and charged on a month to month basis meaning consumers have the ability to switch providers

regularly in order to manage their budgets. EM also notes it would be onerous on the consumer, and difficult to enforce, if a customer was obliged to update their provider when they update their device.

It is not possible for EM to cease providing services to affected device users as we do not have the capability nor access to be able to. Under this proposed determination, EM would be heavily reliant on Telstra Wholesale to achieve this on our behalf. Given the recent and ongoing exit of the 3G network, EM is completely reliant on Telstra for accurate and real time data to manage services on its network that are currently or proposing to use a compliant mobile device. EM are able to provide information to Telstra regarding a SIM being activated and used but not the device that it is being used on. Therefore, EM would be totally reliant on Telstra to identify whether a customer's mobile device can access the Triple Zero (000) emergency call service.

The proposed Determination should also consider the barriers to obtaining a 'compliant' mobile phone may vary based on individual affordability, preference and reliance for access to multiple types of government and community services. Consideration should be given to those facing Financial Hardship, Domestic and Family Violence or who are in vulnerable circumstances. These individuals require access to a working mobile device to access community services and to cease providing a mobile service would eliminate their ability to access this support via a mobile phone.

Whilst EM can provide assistance to customers to find alternate mobile phones, as a BYOD carriage service provider, EM cannot provide compatible mobile devices to the end user.

Should the proposed changes be determined, we seek an exemption for EM. Our service offering allows an end user to choose their own mobile device independently of the services we provide, without knowledge of the mobile device an end user may wish to use. As there is currently a national Integrated Public Number Database (IPND) Manager, EM sees merit in the register being the one source of truth, containing details of mobile devices. We support the ACMA managing this register should the proposed changes be determined in its entirety. However, should any form of the proposed changes be determined, EM believes it is essential that the exit of the 3G network will need to be taken into consideration.

The proposed amendments to ensure mobile phones can have access to the Triple Zero (000) emergency call service presents a significant challenge for EM and other BYOD service providers. Addressing these material barriers to implementation and enforcement requires a multi-faceted approach involving collaboration with Telstra Wholesale, consideration of the 3G network exit, with a focus on customer education and support.

Please do not hesitate to contact me should you wish to clarify or seek any further information.

Yours sincerely,



James McMurough  
**Head of Everyday Mobile from Woolworths**