

James Parker

Brisbane, QLD Australia

8 October 2024

Subject: Proposed Changes to the 'Emergency Call Services Determination' 2024

To the Australian Communications and Media Authority (ACMA),

I note the efforts made with the planned Shutdown of the 3G Mobile Network and the involvement of the ACMA & Government to ensure a smooth transition.

Unfortunately this process has proven unnecessarily difficult, challenging and costly for many. A number of the unintended consequences I anticipated in June and November of last year have unfortunately come to fruition, and many of the impacts are yet to occur in full.

I would like to thank you for establishing an open consultation for the proposed changes to the Emergency Call Service Determination. I have very serious concerns regarding the direction issued by the Minister and the proposed draft changes.

I don't believe the public has been given sufficient time or notice to respond to the consultation process. The short 2 week deadline is not enough time for the public to know about this and provide submissions.

While the direction from the Minister and draft amendments aim to ensure access to emergency services, they will have severe consequences for consumers, competition, and the overall accessibility of mobile services. Whilst also not addressing the core technical standardisation failures with VoLTE Calling and Emergency Calling.

Under the direction and draft, it appears telcos will be required to block all 4G and 5G devices that are not on their official 'supports lists' as supporting calls to 000, even if those devices may work perfectly for emergency calls or accessing other 4G services (i.e. calls, data or SMS).

This policy essentially penalises customers for using devices that work but were not purchased directly from the telcos or their partners. Once in effect, this would further concentrate profits and market control to the telcos & major handset brands, and severely limit competition & choice in the market.

This policy is deeply concerning because many consumers, including myself, own fully functional devices that can make VoLTE calls and emergency calls, yet are deemed "incompatible" by the telcos.

These are devices with the exact same hardware and software as 'officially supported' devices, the only difference is the telcos didn't sell them.

The SMS 'check' **is not reliable** and does not accurately report back the status of calling on all devices, and the providers know this! They have little idea what individual devices can make 4G emergency calls.

This is compounded by the fact that telcos have failed to notify their customers about these impending artificial service restrictions. Telcos are not informing people they will be artificially blocked from connecting starting in November, even if they have working calling, data and SMS on 4G.

Optus has already started doing this for new customers as of 10 September! However, their updated policy document announcing this is only dated 3 September, which I note is 1 day prior to the direction being uploaded on the legislation website.

There was no prior warning that this was going to occur! Optus is currently operating outside of the timelines within the Minister's direction and the ACMA draft. This conduct should not be permissible. Many Optus & Amaysim Customers have only been given 7 days' notice to stop using devices.

Roaming Emergency Calls

The draft changes to the ECSD also do not address the issues with making Emergency calls when roaming. Roamers receiving a warning text message is not sufficient to address this serious issue.

As I wrote in my Inquiry Submission (#32), **60-70% of Android Handsets in use globally do not have VoLTE Roaming Support** (2021 or newer/Android 12+).

Devices without VoLTE Roaming capabilities won't be able to make calls whilst roaming, this issue also impacts emergency calls on different devices.

In the answers to Telstra's Questions on Notice from the Inquiry, they said that in July there were **2.3 million international roaming devices** connected to their network and that **Telstra 'cannot confirm the 4G Voice calling capability of the devices'**!

As I said during the Inquiry, we risk seeing hundreds of people per day being in need of help from emergency services but will be unable to call 000!

That includes roamers with 4G & 5G phones that support both VoLTE Calling & Emergency Calling!

This is not something we have ever seen before! With 2G & 3G you can make an emergency call with any device on any 2G or 3G network in the world.

T-Mobile in the US still has a 2G network in many areas, it was **not** shut down in April, and it still has not been completely shut down. Since 2022 T-Mobile's 2G network has masked the issues of placing an Emergency call in the US (especially for roamers) and the effects are yet to be fully experienced there.

Calling Standards & Solutions

There needs to be one universal baseline standard on all devices and networks, that allows anyone to use any device, purchased from any provider or brand, and use it on any network in the world, and make calls, emergency calls and roaming calls.

Just like what we've had for the last 20-30 years with 2G and 3G.

None of that currently exists with VoLTE and Calling on 4G, despite perhaps what the telcos may claim.

There are \$1,000+ devices that have been sold in major retail stores in the last 2-3 years that are VoLTE enabled but only work on Optus or Vodafone networks, despite being sold as network unlocked.

Telstra needs to be forced to support as many devices as possible, by either supporting the most widely used 'Open Market' VoLTE profiles & standards, or by providing VoIP calling apps to customers that serve as a dialler replacement. (*Such as Jio Mobile's 'JioCall' or Smartfren's 'SmartVoLTE'*)

Ultimately, it's crucial we wait until Europe and much larger markets actually address the compatibility and standardisation issues with 4G Calling & Emergency Calling. This is a global issue and requires a coordinated effort to fix. Blocking devices is to do nothing but sweep the problem under the rug.

Interim solutions and mitigations for these issues do exist and are entirely possible. Calling apps, device firmware updates and other software mitigations need to be provided to domestic customers and roamers prior to switch-off. As I said last year, the switch-off should also be postponed until late 2025/26.

Unlike what was said at the Inquiry on 24 July, with a Calling App like 'JioCall' there is no requirement for the users on the other end to have that app, additionally no new hardware is required.

Please refer to my supplementary inquiry submission for more information (Dated 1 August 2024).

The ECSD also has no provisions requiring providers supply customers with replacement devices that are 'like-for-like'. The providers have been offering customer's low-end network locked devices and basic 'feature phones', not replacements that are equivalent to the current devices people paid for and own.

Beyond just phones, other equipment and devices that only require 4G data & SMS would also likely be impacted, making this policy a significant threat to mobile connectivity. There will be unintended impacts if this goes ahead.

Introduction Conclusion

The revised ECSD in its current form risks completely undermining consumer rights, heavily reducing competition, and endangering public safety by limiting access to essential mobile services.

Blocking devices **is not a solution**, it merely shifts the burden of the industry's failure to address these issues onto consumers. The telcos must be forced to resolve these compatibility issues and provide updates and apps to existing devices, rather than be allowed to disconnect working 4G/5G devices.

The proposed changes to the ECSD must be reconsidered and a solution drafted that respects the rights of consumers, ensures accessibility to telecommunications services and requires the industry to actually fix the problem!

Consumers need certainty and guarantees they will be able continue to use any 4G & 5G devices they own for whatever purpose they desire on any 4G network in Australia post shutdown.

Whether they do or do not support VoLTE calling, emergency calling or only data & SMS, **and without** any artificial device blocks or restrictions being imposed.

Known affected devices can be subjected to a number of service conditions, this includes receive daily text messages and outbound call messages notifying of the possible issues with Emergency Calling over 4G. To me it's clear the industry has no real idea what exactly will work post shutdown. The Providers Commercial Interests must not be put ahead of the broader Public Interest.

Customers with fully working devices that are '*unsupported*' **must not be blocked** from using them and **must not** be subjected to repeated false & misleading text messages and outbound call recordings, (especially if they can demonstrate the device works for emergency calling).

The industry also needs to be required to correct their messaging and **stop** telling customers with perfectly working phones they need to upgrade.

This practice has been occurring for months and there appears to be no accountability for the telcos providing inaccurate and misleading information to customers.

The industry should be required to implement real technical fixes that allow all consumers to access the networks, regardless of where they purchased their device.

In August I had the opportunity to discuss my concerns and these issues with the ACCC, and I would appreciate the opportunity to discuss my Inquiry submission and my concerns with the ACMA.

I am more than willing to discuss these issues and other matters in an open and constructive way. In a manner that ensures a fair & sensible approach, both protecting consumer choice and maintaining user safety.

Please find below responses to the questions asked in the Consultation paper, in addition to some closing words at the end of this document.

Regards

James Parker

Answers to the Issues for comment

1. Objectives and requirements of the direction

The direction sets out the objectives and content requirements of the amendments. It requires carriage service providers to ensure all customers with a functioning service and mobile phone are able to access the emergency call service.

Question 1: Do the proposed amendments to the ECS Determination fulfil the objectives and content requirements of the direction? If not, please explain why, and describe any alternative or additional approaches that could be used to meet the objectives and requirements of the direction.

Response: While both the Minister's Direction and the Draft Determination amendments aim to ensure access to emergency services, they will have severe consequences for consumers, competition, and the overall accessibility of mobile services. Whilst also **not** addressing the core technical standardisation failures that currently exist with VoLTE Calling and Emergency Calling. The current Draft leaves consumers open to unfair practices and will result in devices being unnecessarily and unfairly denied service.

While the determination is designed to be technology agnostic, the realities and issues that presently exist with calling over 4G/LTE networks need be taken into consideration. I have outlined a number of concerns and issues in the answers below.

2. Mobile phone definition

The direction applies to mobile phones that are unable to access the emergency call service. Consistent with the direction, we have not defined mobile phone which means that the ordinary meaning of this term applies.

Question 2: Is the ordinary meaning of mobile phone sufficient noting that the direction does not intend to inadvertently capture other communication devices such as internet of things devices or medical alert devices? If not, please explain what the definition of mobile phone should be and provide reasons.

Response: Current device identification methods are not reliable or 100% accurate. The industry is broadly reliant on device IMEI TAC Codes, IMS User Agent Headers and other device Metadata to classify & identify devices. Within the SMS 3498 'test' system phone handsets have been misclassified as IoT and M2M Equipment, much to the confusion of customers.

Under the proposed determination change, devices will be misclassified, affected handsets may be provided service as they are incorrectly deemed to be IoT/M2M hardware. Additionally M2M hardware may be denied service due to misclassification.

Blanket blocking of all services purely based on device models and brands is not a logical or sensible way to manage this issue. It also creates a double standard where some devices are able to be used whilst some cannot, irrespective of the actual use case for that device.

3. Section 62: Identification of mobile devices that cannot access the emergency call service – new customers

The direction sets out the requirement for carriage service providers to identify if the mobile phone of an end-user who is requesting the supply of service from the provider is able to access the emergency call service on the provider's network and the networks of other carriage service providers. This means that before supplying a mobile service to an end-user, a carriage service provider must identify whether the mobile phone is configured to be able to access the emergency call service on its own network and the networks of the other providers.

The explanatory statement for the direction states that 'this will ensure end-users can access the emergency call service on their own provider's network, and when utilising emergency call camp on functionality across other networks.' Emergency camp-on is a device-initiated arrangement where a mobile phone that cannot access the emergency call service on its 'home' network (because it is out of range, or its home network is unavailable for some other reason) will 'camp-on' to another mobile network that is available and within range to connect the emergency call. Camp-on only works if another mobile network is available to the end-user.

Question 3: Can a carriage service provider currently identify whether the mobile phone that a customer proposes to use to access its network is configured to be able to access the emergency call service before service is supplied to that mobile phone?

Question 4: Can providers currently identify whether a mobile phone that a customer proposes to use is configured to be able to access the emergency call service on the mobile networks of other providers before service is supplied to that mobile phone?

Question 5: If the answer to either of Questions 3 and 4 is no, what additional information would be needed to give effect to such a requirement? Is that information currently available?

Response: No, Carriers are currently largely reliant on established device testing information and network compatibility lists for device models. At the moment customers with compatible phones that support both working VoLTE Calling and Emergency Calling are being incorrectly told their device doesn't have working Emergency Calling. This includes devices with the same software and hardware as 'officially' supported devices. The carriers have little visibility of the actual capabilities of devices for emergency calling, the SOS connection is only established when someone tries to call 000 on 4G.

Question 6: If a mobile phone is configured to be able to access the emergency call service using both the network of the carriage service provider supplying carriage service to it, and the networks of other providers supplying carriage services to the public, can a carriage service provider that is supplying service to the mobile phone identify whether that mobile phone will 'camp-on' to another network if required? If not, please explain why and indicate what additional information would be required to enable a carriage service provider to identify the 'camp-on' capability of a mobile phone.

Response: Noting this question is for the carriers, Emergency Calling and Camp-on is supposed to be standardised across the networks in accordance with 3GPP standards and GSMA guidelines.

With the (4G VoLTE enabled) Android devices I've tested (2014 – 2020 Models) they can reliably camp-on to other networks to place sim-less 4G emergency calls (if running compatible firmware).

The only devices I've encountered issues with are devices running firmware that cannot place emergency calls at all on any 4G network in Australia. *(Though may work in other countries)*

However, a major issue with many devices is not all models support LTE-FDD Band 28 (700Mhz) which is the primary LTE Band used by Optus and Telstra. TPG/Vodafone uses LTE Band 5 (850Mhz), which is broadly supported on almost every 4G/LTE device sold since 2013.

Devices that don't support B28 will be unable to camp-on to make an Emergency Call in an area with no other network coverage *(e.g A regional area or a dense urban location such as a building car park)*.

TPG/Vodafone plans to greatly increase their mobile coverage in 2025 so these issues may be reduced to some extent in the future.

Compounding this issue is there are US/Canada and China variants of phones that do not support Band 28 whereas the Global or European versions do. This has been recently experienced by customers that have purchased refurbished iPhones through local MVNOs and Suppliers, many of these have been US/Canada models without Band 28 Support (e.g iPhone XS, iPhone XR, iPhone 11, iPhone 12 etc).

These devices would be limited in their ability to camp-on to alternative networks due to the bands used by Telstra and Optus. However I don't think it's at all reasonable for these devices to be completely blocked from connecting to the network.

Many people have inadvertently purchased these devices in recent months and have struggled to obtain refunds or replacements from the seller/vendor. Even more are entirely unaware of this issue.

The ACCC is aware of the issues and who has been supplying them, so in time these issues may get resolved for some customers.

However there are still likely to be large numbers of these devices in circulation and to outright disable any mobile services, due to what is essentially a coverage issue, is not in the interests of the consumer.

These devices do support other LTE Bands used by the carriers, so the device will be able to camp-on just not in all situations.

Question 7: What information do (or can) providers know about a mobile phone when it has connected to a provider's network?

Response: The carriers should be able to see the Device IMEI, Sim IMSI, User Agent Headers, and IMS (VoLTE) Registration Status etc. The carriers will not be able to definitively see or know what device firmware is installed on the device, the modem configurations available on the device, apps installed, nor its exact emergency calling capability.

Devices only fully initiate the SOS APN and SIP registrations when attempting to place a call to an Emergency Number. This factor makes it difficult to know if device will work or not, combined with additional networks and possible roaming conditions, this can make it very complex. This is something the Industry is working to address internationally.

Via installed Telco apps, the carriers would be able to see very specific device information including device software and versions, hardware IDs etc. However not all customers will have such apps installed and the handling of that information is a contentious issue.

It would not be reasonable to require customers to install such an app that enables the provider to classify their device. Not all devices would support such an app and not all customers would want to install a carrier app for this purpose. The accuracy of this information is also not guaranteed and could be spoofed by users.

Question 8: Can providers:

- (a) identify the make/model number of a mobile phone once it has connected to its network?
- (b) share information with each other to identify mobile phones that cannot access the emergency call service on mobile networks?

Response: As mentioned in the answer to Question 2, current device identification methods are not reliable or 100% accurate. The industry is broadly reliant on device IMEI's, TAC Codes, IMS User Agent Headers and other device Metadata to classify & identify devices. This information cannot be relied upon to accurately identify devices and their capabilities. (See below)

Question 9: Based on information that is available or will be available to providers on 1 November 2024, indicate the number or proportion of mobile phones to which providers currently supply service, that providers may no longer be able to supply service to because of the requirements in the draft amendments to the ECS Determination. Please explain your response indicating which provision/s is relevant to your answer.

Response: Question for the Carriers, however there are likely to be tens to hundreds-of-thousands of 4G/5G devices that currently work perfectly but are currently not recognised as compatible. These include devices that can make VoLTE calls and Emergency Calls. The carriers must not be allowed to cease providing service based on pre-established 'device compatibility' & testing lists.

Question 10: What are the minimum reasonable steps that a carriage service provider should take to identify whether a customer's mobile phone can access the emergency call service on their network and the networks of other carriage service providers?

Response: The industry cannot be allowed to use device IMEI TAC Codes to block entire makes and models of phones. There must be an Emergency Calling Test Number or facility established that allows customers to take any phone, purchased from anywhere in the world, from any vendor and test it themselves for Emergency Calling Support on the networks. (Either pre or post 3G Shutdown)

At this point in time it would be for VoLTE Emergency Calling Support with 4G/LTE Networks. In future this would also apply to SA 5G (NR) and VoNR (Voice over New Radio) and new '6G' technologies.

Such a (call) test system should be incorporated into the service activation process for customers.

This process should be a simple DIY procedure that can be performed by any customer regardless of their technical ability. Based on emails released under FOI, the idea for a 000 test number was suggested earlier this year, however Telstra raised concerns regarding legitimate calls ending up on the test number, as well devices defaulting to 3G regardless. Those issues can be mitigated and resolved.

It is worth pointing out that Emergency Call testing can currently be done with many Android devices by forcing the phone to be 'LTE Only' (in settings) and watching the band icon when placing a Call. However this currently requires dialling a real Emergency Number, though only for a brief time.

It's quite obvious what devices are reliant on 2G & 3G for Emergency calling as they will currently drop their VoLTE registrations and fall back on 850 or 900Mhz 3G Networks.

This basic method of testing is quite consistent and reasonably reliable. Refer to the information below:

The Little Known Problems with VoLTE Emergency Calling - How to Test for 4G Emergency Calling Support on Android
<https://medium.com/@jamesdwho/the-little-known-problems-with-volte-emergency-calling-3d4cdaf0e042>

Once an individual device (IMEI) is determined to be able to access the Emergency Call service on a network (over 4G) that device must be able to connect and reconnect to that carrier network or MVNO **without** any service restrictions, even if similar makes and models of device are known to have issues.

Not all devices are running the same device software version or have the same carrier modem loaded.

A customer may be able to use an affected device that is on the official support lists!

They could have an international or alternative carrier version of an 'officially supported model', but that device may not work properly for calling or emergency calling due to the software loaded on the device.

Alternatively someone could have an officially supported device with but with out-of-date AU software.

Refer to the tables below. (Table were included in my Supplementary 3G Shutdown Inquiry Submission #32.1)

MBN Modem Configurations Qualcomm SD 835 Chipset (2017)	Network Name	Country	Sim-less 4G Emergency Calls (112/000)	Optus VoLTE	Vodafone VoLTE	Telstra VoLTE
bouygues_france_ims_tar.mbn	Bouygues Telecom	France	No	No	No	No
ee_ims_tar.mbn	EE	UK	Yes	No *	No	No
emt_estonia_volte_vilte_tar.mbn	EMT/Telia Estonia	Estonia	NO - Call Fails	No *	No	No
hutch_uk_volte_vowifi_tar.mbn	3 (Three) UK	UK	Yes	No	No	No
ir51_ir92_ims_gte_tar.mbn	VoLTE + WiFi Call	GSMA Open Mkt	Yes	Yes	Yes	No
ir51_ir92_ims_tar.mbn	VoLTE + WiFi Call	GSMA Open Mkt	Yes	Yes	Yes	No
kpn_netherlands_ims_tar.mbn	KPN NL	Netherlands	No	No *	No	No
optus_au_ims_tar.mbn	Optus	Australia	Yes	Yes	No	No
orange_france_pp_volte_vowifi_tar.mbn	Orange FR	France	Yes	No *	No	No
orange_france_volte_vowifi_tar.mbn	Orange FR	France	Yes	No *	No	No
orange_spain_ims_tar.mbn	Orange ES	Spain	No	No	No *	No
tele2_netherlands_ims_tar.mbn	Tele2 NL	Netherlands	No	No *	No	No
telefonica_uk_ims_tar.mbn	O2 UK	UK	NO - Call Fails	No	No	No
telekom_netherlands_ims_tar.mbn	T-Mobile NL	Netherlands	No	No *	No	No
telstra_au_ims_tar.mbn	Telstra	Australia	Yes	No	No	Yes
vha_au_ims_tar.mbn	Vodafone AU	Australia	NO	No	Yes	No
vodacom_za_ims_tar.mbn	Vodacom ZA	South Africa	No	No	No	No
vodafone_germany_volte_vowifi_tar.mbn	Vodafone DE	Germany	No	No *	No	No
vodafone_uk_volte_vowifi_tar.mbn	Vodafone UK	UK	NO - Call Fails	No *	No	No

* = Estimated Result based on other network testing

Test Device: Sony Xperia XZ1 (XZ1C/XZP) - 2019 Android 9.0 Firmware

Tested Q2 2024 -Xperia XZ Premium is officially supported by Telstra & Optus (Vodafone removed it from their website Q3 2023)

MBN Modem Configurations Qualcomm SD 820 Chipset (2016)	Network Name	Country	Sim-less 4G Emergency Calls (112/000)	Optus VoLTE	Vodafone VoLTE	Telstra VoLTE
bell_ims_tar.mbn	Bell CA	Canada	Yes	No	No *	No
bouygues_france_volte_vilte_tar.mbn	Bouygues Telecom	France	No	Yes	Yes *	No
china_mobile_hk_ims_tar.mbn	China Mobile HK	China/HK	No	No	No *	No
cht_ims_tar.mbn	Chunghwa Telecom	Taiwan	No	No	No *	No
claro_br_ims_tar.mbn	Claro	Brazil	No	No	No *	No
du_ims_tar.mbn	Du Mobile	UAE	No	No	No *	No
ee_ims_tar.mbn	EE	UK	Yes	No	No *	No
emt_estonia_ims_tar.mbn	EMT/Telia Estonia	Estonia	Yes	Yes	Yes *	No
hutch_uk_ims_tar.mbn	3 (Three) UK	UK	No	Yes	Yes *	No
hutch_uk_volte_vowifi_tar.mbn	3 (Three) UK	UK	Yes	Yes	Yes *	No
ir51_ir92_ims_gte_tar.mbn	VoLTE + WiFi Call	GSMA Open Mkt	Yes	Yes	Yes	No
ir92_ims_gte_tar.mbn	GSMA IR.92 VoLTE	GSMA Open Mkt	Yes	Yes	Yes *	No
optus_ims_tar.mbn	Optus	Australia	No	Yes	No	No
orange_france_ims_tar.mbn	Orange FR	France	Yes	Yes	Yes	No
orange_poland_ims_tar.mbn	Orange PL	Poland	No	Yes	Yes *	No
orange_spain_ims_tar.mbn	Orange ES	Spain	No	Yes *	Yes	No
reliance_jio_ims_tar.mbn	Jio Mobile	India	Yes	No	No *	No
rogers_ims_tar.mbn	Rogers CA	Canada	Yes	No	No *	No
sfr_france_ims_tar.mbn	SFR FR	France	No	Yes *	Yes	No
singtel_ims_tar.mbn	Singtel SG	Singapore	No	No	No *	No
starhub_ims_tar.mbn	Starhub SG	Singapore	No	No *	No	No
swisscom_switzerland_ims_tar.mbn	Swisscom CH	Switzerland	Yes	No	No *	No
amss_fsg_dora_tar.mbn	Default Config	Global	No	No	No	No
tele2_netherlands_ims_tar.mbn	Tele2 NL	Netherlands	No	Yes *	Yes	No
telefonica_germany_ims_tar.mbn	O2 DE	Germany	No	No	No *	No
telefonica_spain_ims_tar.mbn	O2 ES	Spain	No	No *	No	No
telefonica_uk_ims_tar.mbn	O2 UK	UK	No	Yes	Yes	No
telekom_czech_ims_tar.mbn	T Mobile CZ	Czech	Yes	No	No *	No
telekom_germany_ims_tar.mbn	Telekom DE	Germany	Yes	Yes	Yes *	No
telstra_ims_tar.mbn	Telstra	Australia	Yes	No	No *	Yes
vha_ims_tar.mbn	Vodafone AU	Australia	No	Yes	Yes	No
vodafone_germany_ims_tar.mbn	Vodafone DE	Germany	No	Yes	Yes *	No
vodafone_nl_ims_tar.mbn	Vodafone NL	Netherlands	No	Yes	Yes *	No
vodafone_spain_ims_tar.mbn	Vodafone ES	Spain	No	Yes	Yes *	No
vodafone_uk_ims_tar.mbn	Vodafone UK	UK	No	Yes	Yes	No

* = Estimated Result based on other network testing

Test Device: Sony Xperia XP F8131 - 2018 Android 8.0 Firmware

Tested Q2 2024 –Xperia XZ & X Performance is officially supported by Telstra

If the industry is allowed to rely on device models and IMEI TAC Codes then users with officially supported hardware but incompatible software would be allowed to connect to the network without any warning their device lacks working Emergency Calling. There is a risk this is already occurring.

As I wrote in my 3G Inquiry Submission (#32.1), Vodafone removed a large number of affected devices from their website in late July 2023, however they didn't warn their customers or public.

These are devices that support 4G VoLTE Calling but not to Emergency Numbers.

Additionally a number of the devices they removed from their list are still in some cases on Telstra's and Optus's Support List, which means many of these potentially affected devices are likely still in use and circulation.

I do wonder if we would be in a different position today if that issue was more thoroughly discussed and investigated at that time, rather than just quietly removing affected devices from websites.

Devices Removed from Vodafone's Website between July-August 2023

Samsung	Huawei	HTC	Sony
Galaxy S5 (2014)	GR5 2017	10 (2016) ✓✓	Xperia Z3 (2014)
Galaxy S6 (2015) ✓	Mate 10 (2017)	U 11 life (2017) ✓✓	Xperia Z5 (2015)
Galaxy S6 edge (2015) ✓	Mate 9 (2016)	U Ultra (2017)	Xperia X (2016) (X Performance ✓)
Galaxy S6 edge+ (2015) ✓	Mate20 (2018)		Xperia XZ Premium (2017) ✓✓
Galaxy S7 (2016) ✓✓	Mate20 Pro (2018)	Oppo	Nokia
Galaxy S7 edge (2016) ✓✓	Nova 2i (2017)	A73 (2020)	3 (2017)
Galaxy J5 Pro (2017) ✓	Nova 3e (2018)	R11 (2017)	6 (2017)
Galaxy Note 4 (2014)	P10 (2017)	R11s (2017) ✓	
Galaxy Note 5 (2015) ✓✓	P9 (2016)		
Key: ✓ = On Optus's VoLTE List ✓✓ = On Telstra's VoLTE List			

In some instances the Telstra and Optus Firmware versions of those devices support Emergency Calling over 4G but not necessarily VoLTE Calling on all networks.

Further note, some of the above devices will have working calling and emergency calling when used with either Telstra or Optus Network Sim Cards but when a Vodafone Sim Card is inserted the phone may continue to make calls but will lose the ability to make 4G Emergency Calls.

When switching network a brief Emergency Call test should be conducted when activating the device, some devices may not load the correct modem configuration with certain MNO or MVNO sim cards.

Despite what has been said previously, these VoLTE compatibility issues are not hardware issues they are software problems. Gone are the days of 2G and 3G where any 2G or 3G device could place a call or an emergency call on any 2G/3G Network in the world.

The device software aspect and firmware issues need to be taken into consideration. Phones and their capabilities aren't just hardware with the right Radio Band support. The software component is a key issue and will become an increasingly big problem in a future 5G only (NR SA) network.

Not all 5G Devices support all the 5G bands used in every country and not all devices actually have the bands enabled in software. Bands are frequently disabled in software unless a supported carrier/country sim card is inserted into the device. This 'LTE Band 28 issue' we've seen will be even worse in a future 5G only network.

The determination of a device's emergency calling capabilities must be for that specific user's device, not the brand, model name, TAC, IMEI Range or any other broad classification.

Any testing system must be fair, practical & reasonable, and not overly onerous.

I would argue the industry (handset makers & carriers) have a conflict of interest in these matters, they would rather sell customers new devices rather than support the existing devices people already own.

I spoke to this at length at the 3G Shutdown Senate Inquiry.

As indicated by the TIO at the Inquiry, customers were sold products and services they did not originally intend to purchase.

It should not be deemed acceptable to block devices because either the Handset maker or the telco doesn't want to test them or is unable to formally test them.

Additionally, devices incorrectly deemed to be 'affected' but otherwise work for Emergency Calling must **not be blocked** from any mobile services or be subjected to any outbound call recordings or messaging.

Many Android devices are sold with unlockable bootloaders, customers are able to install device firmware & open source software from other software vendors and update their device beyond what was initially provided by the Manufacturer. *(Similar to what you can do with an Intel or AMD based PC)*

This includes updates that enable full VoLTE Calling support and Emergency Calling Support.

The carriers should be considered to be in breach of the determination if they block mobile services to any device that is capable of placing calls and Emergency calls on their network.

Additionally Telstra needs to be forced to support the most widely used 'Open Market Device' VoLTE profiles that are running on Devices. Newer 2024 'Open Market' devices are reported to now work on Telstra for standard calling, but older models running generic GSMA or 'Global' VoLTE profiles do not work, but can work on Optus & Vodafone. *(At least prior to Optus initiating a heavy handed device blocking policy in September) (Note: Emergency Calls do work with Telstra on these devices as it's a separate bearer).*

There must be a strict, clear and an unambiguous requirement that the carriers cannot block or restrict any device that can work for Emergency Calling, regardless whether it's been officially tested by the handset maker or carrier.

Instead of blocking and restricting service to BYO devices the carriers should be required to implement an accurate system that allows them to address the capabilities of devices where customers bring their own, just as highlighted in the Bean Review. Not to block devices they cannot confirm.

The alternative is to completely eliminate consumer choice in the market and give the carriers complete control over what handsets customers can use, and for what purposes. This is an absolutely unacceptable proposition.

AT&T in the US will block devices from connecting even if they are running compatible hardware and software. Unless you buy a phone from AT&T or their partners you cannot use it on their network.

These anticompetitive practices must be prohibited, and severe penalties must apply if the carriers are found to block devices that have functionally compatible hardware and software.

This policy from AT&T has resulted in Customers within the US spoofing their Device IMEI to a compatible model. Once spoofed the device will connect just fine, calling and emergency calling will also work perfectly as the device is running the correct modem profile and configuration for AT&T.

If needed, customers could be required to agree to 'BYO device waiver', such an account setting would be accessible via the online account webpage for that customer or via the mobile app.

The setting and waiver would remove all technical restrictions for a service and allow a customer to use any device regardless of the capabilities. The waiver would make it clear that Emergency Calling may not work. Such waivers already exist for NBN Based VoIP Landline phone products, it would be a double standard to not extend this to mobile services.

It's also worth noting that in recent months customers with perfectly compatible (2024) imported phones but have been told 'their device is incompatible' and 'they need to upgrade'.

Only now are some receiving text messages to say “sorry for the confusion” ‘we’ve got in contact with the manufacturer your device will continue to work’.

Australia’s 3G Shutdown - Telcos to Block Working 4G/5G Phones! - Complaints regarding Providers ‘Upselling’
<https://medium.com/@jamesdwho/australias-3g-shutdown-telcos-to-block-working-4g-5g-phones-2bf41e95de8a#db2e>

The carriers need to serve the market and what the market has, not dictate the market.

There are three main network providers, but there are millions of customers and millions of handsets, the three cannot be allowed to dictate the market.

4. Section 63: Notification requirements and restriction on supply – new customers

The direction sets out the requirement for carriage service providers to notify end-users that the mobile phone they intend to use is not able to access the emergency call service and the requirement that the carriage service provider is not able to supply carriage services in connection with that phone. This means that neither voice nor data services should be supplied to a mobile phone that cannot access the emergency call service.

The direction also requires carriage service providers to provide end-users with information about alternative mobile phones, including low-cost or no-cost phones that can access the emergency call service.

Question 11: Should any groups of carriage service providers be exempt from the obligations? Or should there be different obligations on certain sub-sets of carriage service providers? If so, please explain.

Response: Blocking services to phones that (with 100% certainty) cannot call Emergency Services (over 4G) is broadly speaking a reasonable concept, at least in theory.

However the reality with implementing that accurately is essentially impossible without user self-testing methods being available for BYO devices.

I am of the strong view that services **should not be terminated** to any devices technically capable of receiving any services. Instead conditions can be imposed on that service that ensure the Customer understands the claimed fault with that device and the remedies available.

The alternative (*and what is currently happening with Optus*) is customers put their sim into the device and they have no idea why it’s not working, users try to troubleshoot this issue, only for hours later to discover that Optus has unilaterally decided to brick their device with minimal or no notice.

Noting that using IMEI TAC Codes and the broad blocking of ‘untested’ devices **WILL RESULT** in perfectly working devices that support calling and emergency calling on 4G being unfairly denied service.

So this **does not** occur the mobile service could instead have the following example conditions imposed. *These conditions are based on an emergency call testing number being available for individual device testing.*

- After testing, a known to be affected device would be subjected to short outbound call messages multiple times per day when placing a call. (This system currently exists.)
- Service to this device must be manually renewed at the end of every billing cycle (up to 28/30 days), auto-renew for a customer with a known affected device would not be enabled.
- The manual payment process could remind the user of the identified issue with the device in use and also require the customer to agree to terms and conditions that state the device cannot access emergency services.
(Such service terms and waivers already exist for landline NBN phone products, in the event there is a network outage or power outage calls including emergency calls are unavailable.)
- A customer with a known affected handset should receive regular (daily/weekly) text messages advising of unavailability of Emergency Calling. (This system currently exists.)
- The customer should be supplied with an Emergency Calling VoIP Dialler App which can provide access to Emergency Calling either via Mobile Data or Wi-Fi as a mitigation.
(or alternatively a VoIP Calling ‘Dialler Replacement App’ similar to Jio Mobile ‘JioCall’)
This would not be recommended for the elderly or anyone with health or medical conditions etc. Understandably this system would not work in the event there was a network outage or if the customer was in an area without mobile coverage or access to Wi-Fi. However these particular limitations should not exclude this from being established and the net benefits for customers out way the limitations. No new hardware is required to use a carrier VoIP app and only the customer needs to have the app.

The actual risk is customers expecting the phone is capable of calling 000/112 when it cannot.

If the customer is fully aware of the limitation, is comfortable with that limitation, can take other measures such as having a backup or secondary device in their possession (and/or a carrier supplied calling app), the onus is then on the customer.

This is no different to someone not having a mobile phone in their possession at all, this was the norm only some decades ago.

An Australian customer having a device which happens to not be able to call 000 is no worse off, provided they know that limitation and have alternatives, and with the above app mitigation is actually an improvement.

Understanding that some of the above conditions and solutions may not fall within the current direction from the Minister, these aspects should still be considered.

5. Section 64: Identification of mobile devices that can no longer access the emergency call service – existing customers

The direction sets out the requirement on carriage service providers to use best endeavours to promptly identify if an end-user's mobile phone to which it is providing carriage services is no longer able to access the emergency call service. This would address the situation where a person puts a SIM into an 'older' style mobile phone (for example as an interim measure because their usual mobile phone has stopped working) that is not configured to be able to access the emergency call service. The draft amendments require carriage service providers to identify such phones, notify end-users and ultimately stop supply of carriage services to those mobile phones.

The direction does not provide a timeframe for how often a carriage service provider should be identifying mobile phones that are not able to access the emergency call service. We propose to specify that a carriage service provider must use best endeavours to identify these mobile phones.

Question 12: Can a carriage service provider identify whether a mobile phone that it is supplying carriage services to can no longer access the emergency call service? If not, what, if any, additional information would providers need to identify such phones?

Response: No, as per the response to Questions 3-5, at the moment carriers are largely reliant on established device testing information and network compatibility records for device models.

Currently customers with compatible phones that support both working VoLTE Calling and Emergency Calling are being incorrectly told their device doesn't have working Emergency Calling.

This includes devices with the same software and hardware as 'officially' supported devices. The only difference is the carrier didn't sell them. *(This also includes phones that have successfully dialled triple-zero (000) over 4G many times).*

This practice has been occurring for months, and has continued even after the Senate Inquiry. The industry doesn't really know what works and what doesn't and is over reliant on 'compatibility lists'.

The customer should be required to call a 'test emergency number' if they wish to use a device on an ongoing basis (with auto renewing service).

Devices that have not been connected to the network for an extended period of time would need to undergo basic user testing to validate the emergency calling capability of the device on the network. *(e.g. if the customer attempts to use an old phone that has not been used on the network for 6+ months etc).*

That device should still receive all other mobile services, however conditions and warning messages must be imposed on that device when being used so the customer is correctly informed.

If that device is later updated (either by the user or vendor) it can be re-tested by the customer and the warning messages are removed, auto-renew would also be re-enabled.

We should encourage regular device testing by users and make it standard practice going forward.

6. Section 65: Notification requirements and restrictions on supply when a mobile device can no longer access the emergency call service – existing customers

The direction requires carriage service providers to notify end-users when their mobile phone is not able to access the emergency call service and to stop supply of carriage services within a specified period.

The draft amendments require a rolling set of notifications at 7-day intervals to advise customers that their mobile phone is no longer configured to be able to access the emergency call service and that all carriage services supplied by the provider to the mobile phone will be disabled. This would result in both voice and data services being supplied to that mobile phone being disabled.

Question 13: Does this raise any issues for end-users that should be considered?

Response: Yes, is it not reasonable or proportionate to entirely deny all mobile service to an end user with a device. Whether that device is only capable of '4G Data & SMS', '4G Calling, Data & SMS' or '4G Calling, Emergency Calling, Data & SMS'. There will be major unintended consequences when that starts occurring and some customers will be cut off from all means communication.

Additionally, customers may wish to continue to use a device as a spare or for Data and SMS only purposes, and this should not be prevented. However the customer should be properly informed as mentioned above and conditions and warnings imposed on that device and service.

An Emergency Calling test number would allow the user to know for certain the device does or doesn't work for that purpose and take the appropriate measures.

Question 14: Is the rolling set of notifications to ensure that end-users have sufficient time to change mobile phones before their services are disabled appropriate? If not, why not?

Response: The customer should first have to be using a compatible device before even remotely considering disabling service. Service should also not be disabled, but in this example the customer should have to be using a compatible device. Auto-renew payments should be disabled with 'affected' devices as outlined previously. Manual payment & service renew should remain available at all times.

Question 15: Should any other information be included in notifications to help the end-user to prepare for the disabling of their carriage services and prompt them to action?

Response: Services should not be outright disabled that is unreasonable and not proportionate.

Question 16: Noting that the disabling of service to an end-user's mobile phone will require the end-user to obtain another mobile phone, do providers have any data available or information relevant to the assessment of the likely cost of this requirement to end-users of mobile services?

Response: Customers are likely to be out of pocket hundreds to thousands of dollars to replace their devices. Many customers have only purchased new devices in the last 12-18 months but are now at risk of their service being disconnected.

As consumers they have done nothing wrong. They were told to purchase a 4G or 5G device that supports VoLTE calling. Consumers have done the right thing, it is not reasonable to entirely deny service to devices when they are otherwise capable of working. As I outlined in my 3G Senate Inquiry Submission, the carriers (along with the media) have neglected to accurately inform people about the issues with VoLTE compatibility with 4G and 5G Devices. The consumer is not at fault here.

Question 17: Should the Determination specify the acceptable forms of notification, or leave this undefined to provide flexibility to carriage service providers to determine appropriate methods of notification?

Response: There should be a minimum set of notification requirements the carriers have to follow. This should include all of the following:

- SMS's
- Emails
- Letters
- Notifications/Alerts within online service portals & carrier mobile apps

The carriers should also be required to state with detail why they believe a specific device is 'affected' and how they have determined that.

Customers with 4G VoLTE enabled devices have received messages stating they would lose Calling, Data and SMS on their device when that is not true. (As if they have a 3G Only device)

For example they should make it clear exactly why they are ceasing service, either because they assume the device doesn't work (because it's untested) or if they have evidence that exact individual device doesn't work.

The carriers' needs to provide evidence and proof as to why a customer should no longer be able to use a device. The customer should be able to refute those claims with evidence the device works for 000.

7. Section 66: Requirement to update payment assistance policy

The direction requires carriage service providers to include in their payment assistance policy at least one method by which customers in financial hardship can receive assistance to obtain a low-cost or no-cost mobile device that can access the emergency call service.

Question 18: Should any groups of carriage service providers be exempt from the obligations? Or should there be different obligations on certain sub-sets of carriage service providers? If yes, please explain.

Response: Though the determination direction from the Minster does not specify this, the carriers should be required to provide customers with replacement devices that are 'like-for-like' or equivalent to the current handset in use by the customer.

It's not sufficient for the provider to be forcibly disabling service to modern high-end 4G/5G smartphones and only provide the customer with a network locked \$40 'feature phone'. The devices supplied by the carriers for 'low or now cost' also need to be network unlocked and work on all providers without limitations.

In August I received an offer from Vodafone for a "\$59 value" Feature phone that was actually on sale at the time on Vodafone's website for \$39. That was an offer sent to a mid-range Android Smartphone worth hundreds of dollars (*which could also be fixed with software changes/updates*).

Customers need to be made whole if they are going to be denied service on the handset they paid for and own, not left with something that's not even remotely fit-for-purpose for their needs.

I would deem a discounted device not sufficient either. If the carriers are going to render the customer's current device useless they have to supply them an equivalent replacement at no charge.

This requirement will also ensure that the carriers invest in the right systems and tools to validate the existing devices in use by the customer. Perfectly working devices must not be denied service.

8. Section 67: Exception – foreign travellers in Australia

The direction provides an exception to requirements on carriage service providers under sections 63 and 65 to send rolling notifications to customers that their mobile phone is unable to make emergency calls and not supply carriage services to foreign travellers who intend to remain in Australia for no more than a specified period. The draft amendments set this period at 60 days.

The carriage service provider must have already sent a notification to the mobile device to the effect that the device is not able to access the emergency call service.

Question 19: Are carriage service providers able to confirm that a person requesting the supply of a mobile service is a foreign traveller to Australia and the period of time that such a person may intend to stay in Australia?

Response: Understandably this is question for the carriers, however this could only practically be achieved by obtaining information from a Roaming partner or in the instances where a traveller purchases a local sim, the passport or other identification documents for that person.

Though this information is already collected when Sims are registered and purchased, ensuring that the information is kept secure is important. (Noting the Optus data breach and data security failures)

There is also the risk that dual citizens or frequent business travellers may not be correctly classified as traveller or vice versa.

Question 20: Where a foreign traveller roams on more than one network in Australia, the proposed amendment would require all carriage service providers that handle roaming to comply with the notification requirement. Is this appropriate? If not, why not?

Question 21: Should the exception involving foreign travellers in Australia be limited to situations where the carriage service provider is being approached in Australia to supply services? This would exclude the requirements from applying to international roamers. If not, why not?

Question 22: Is the 60-day period for foreign travellers to use carriage services on mobile phones that are not able to access the emergency call service appropriate? If not, why not, and what alternative timeframe would be appropriate?

Response: As I mentioned in my Submissions to both the Optus Outage Senate Inquiry (#34) and the Shutdown of the 3G Mobile Network Inquiry (#32). There are very serious issues with VoLTE Calling & Emergency Calling globally, and this will impact travellers/roamers and their ability to place emergency calls in Australia. It cannot be understated how serious this issue is.

I have tested devices that are 4G VoLTE Enabled (for carriers in other countries) and when I try to make an Emergency call here with that device on 4G (with a modem profile from another carrier) it will just get stuck on calling and the emergency call will never connect. Various EU and UK Carrier profiles seem to be particularly affected by the issue.

Additionally there are many EU Carrier profiles that are hard coded to use 2G/3G (CSFB) for Emergency Calls. This includes on devices that might be otherwise 'supported' and compatible here in Australia. (See above)

It is not sufficient to leave roamers & travellers with no alternatives for contacting emergency services for up to 60 days! Especially in a country as big as Australia. A text message warning is not sufficient.

Nor is it reasonable to block their devices immediately after arriving here and to require them to use another device.

Telstra in their 'Answers to Questions taken on Notice' from the 3G Inquiry stated that in the month of July there were 2.3 Million International Roaming Devices connected to their network, and due to how 4G calling operates they are unable to confirm the calling capability of those devices.

Approximately 60-70% of Android devices in use do not support VoLTE Roaming VOLTE (Android 12+).

Even if there are further delays to the shutdown the issues with VoLTE calling will still exist for the foreseeable future so mitigation options need to be explored.

An Emergency Calling VoIP app that uses Mobile Data and Wi-Fi needs to be available (and provided) to travellers/roamers when in Australia. NSW Police recently rolled-out the BluLink Livestreaming system, so this concept is not unfeasible.

To not do so will see hundreds of people per day being in need of help, but with no way to contact Emergency Services.

Any data usage for such an app should be excluded from any service data caps (i.e unmetered).

Even travellers with 4G and 5G devices that support VoLTE Calling and Emergency Calling can be affected by this.

There are extremely major issues with Emergency Calling as pointed out at the 2022 EENA Presentation by Telecoms Expert Rudolf van der Berg.

Following on from his presentation the GSMA established a task force to try and address the issue. That was late 2022, these issues have not been resolved yet for all devices and networks!

To switch-off all Circuit Switched Calling networks before the VoLTE compatibility issues have been resolved globally is very dangerous. There needs to be more oversight regarding this issue, in my view there has not been enough to date.

Though the determination and the direction from the Minister has no direct relation to the 3G shutdown this is still an important issue to note.

As a reminder T-Mobile still has a 2G Network across many areas of the US! It was not shutdown in April this year and still has not been completely shut down.

The presence of T-Mobile's 2G Network since the 2022 US Shutdowns has masked the issues of Roamers placing Emergency Calls when in the US and the effects are yet to be fully experienced there.

The US cannot be used as an example of a country that has successfully shutdown both 2G and 3G, because they haven't done it yet.

I've read that only the Ericsson based equipment was shut down and the Nokia equipment is expected to remain for some time as they can dynamically share spectrum with 4G/5G services.

This is the case with other networks and countries as well, the 2G network remains as an ultimate fall back and spectrum is dynamically allocated when required. The Low bandwidth requirements of 2G enables this to be a viable option for many countries whilst the issues with VoLTE are resolved.

It seems we should have instead shutdown the 3G network first and left the 2G network as a fall back.

9. Feasibility and cost

We welcome detailed information about issues, costs and benefits from an economic and social standpoint against the proposed amendments to the ECS Determination.

Question 23: For carriers and carriage service providers, what are the likely costs and benefits of implementation for your organisation? (Please provide specific cost estimates in your response.) Are there alternative ways to achieve the objective of the direction that would be consistent with its terms and provide for lesser costs and/or greater benefits?

10. Additional/preferable requirements

Question 24: The ACMA is seeking feedback on whether there are:

- Additional matters aligned to the objectives that should be included in the proposed amendments to the ECS Determination?
- Matters included in the proposed amendments to the ECS Determination for which alternative arrangements that should be considered?

Please provide evidence to support your position.

Online Petition

After reading the Determination Direction changes from the Minister I created an online Petition and article outlining the issues with the direction and the proposed changes of shutting down the network.

Australia's 3G Shutdown - Telcos to Block Working 4G/5G Phones! – Medium – James Parker
<https://medium.com/@jamesdwho/australias-3g-shutdown-telcos-to-block-working-4g-5g-phones-2bf41e95de8a>

On 29 September Australian Technology YouTuber Hugh Jeffreys (950K Subscribers) published a video about the Determination Direction and the Shutdown of the 3G Mobile Network.

YouTube - Australia to Block Internationally Purchased 4G/5G Phones As Part of 3G Shutdown - Starting 1st Nov
<https://www.youtube.com/watch?v=RPITz-3estM>

Within 7 days that video has achieved over 300,000 views, 15,000 Likes, over 4000 Comments. The Change.org Petition has achieved over 5000 signatures, over 90% are from Australians.

Change.org - Stop Telco 4G/5G Device Blocking & VoLTE Restrictions - Australia's 3G Shutdown
<https://www.change.org/StopTelcoDeviceBlocking>

In Closing

I would ask the ACMA (& the Minister) to thoughtfully consider the issues that have been raised by the public both in regards to the ECS Determination and the Shutdown overall.

If large numbers of working devices are blocked in the coming months it will cause immense harm to customers, competition and the environment.

Blocking of working handsets is a deeply unpopular action and is not likely to be taken well by customers, even if believed to be 'in their best interests'.

Optus is already doing this without these rules being formally in place.

There should be penalties for their behaviour here, they are not treating their customers fairly.

There is a sensible & balanced approach that can be taken here, and I hope the ideas outlined here in my submission and by others go some way towards achieving the right approach.

I fully understand the basic motivations behind wanting to ensure access to emergency services, but due to the failures of industry to know what devices work, this needs careful consideration and a proportionate response. The determination direction and current draft are need of major improvement.

Ultimately it's clear shutting down the 3G Network in 2024 is a premature endeavour and practically speaking needs to be postponed until Europe and much larger markets actually address the compatibility and standardisation issues with VoLTE Calling.

Australia is too small of a market for handset makers to care about, we should not be leading this change, but following it.

Requiring Optus, Telstra or Vodafone VoLTE firmware on mobile devices provided by those companies will severely reduce choice for consumers, in addition to allowing the major telcos to exert more control over the smartphone and telecommunications space.

Australian consumers should be free to purchase devices from any retailer, online store or international brand and have it work here in Australia, just as they have been able to do for the last 20-30 years with 2G & 3G.

The consistent standardisation of 2G & 3G has enabled seamless global connectivity and greatly enhanced competition in the mobile sector.

User enabled testing methods for Emergency Calling can provide certainty and confidence in the system, it will also allow issues to be more quickly identified and resolved.

I'm sure many other countries will learn from Australia and not make the same mistakes with their switch-offs of 2G & 3G Networks.

I earnestly request that the concerns of customers are taken seriously and are put at the forefront of the issue. I also believe the consultation with the public should continue with this matter so everyone has an opportunity to voice their concerns. Two weeks is not sufficient.

I am happy to discuss this issue and my Inquiry Submissions at any time.

I would greatly appreciate the opportunity to discuss this matter and my concerns further.

Thank you for your time.

Regards

James Parker
Brisbane, QLD