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**RE: Proposed amendments to improve the operation of the emergency call service – Consultation paper**

I am writing to you in my capacity as the Executive Chair of the National Emergency Communications Working Group for Australia and New Zealand (NECWG) in response to the February 2025 consultation paper in relation to the proposed amendments to the Emergency Call Service Determination to improve the operation of the emergency call service.

The NECWG was established almost thirty years ago and has established a solid reputation as an effective working group that is able to provide independent analysis of critical matters impacting on the Emergency Call Service. With membership of the NECWG including Emergency Service Organisations (ESO), Public Safety Organisations (PSO), Emergency Call Persons (ECP), Government, and Telecommunication Carriers, it is well positioned to consider and provide advice in relation to the proposed amendments.

The comments contained in this document are not intended to represent or replace the responses to the consultation paper by individual members of the NECWG, rather it is intended to highlight national considerations, largely from an ESO operational perspective, when finalising the proposed amendments.

On this basis, where it is determined that the question relates to a specific segment or individual consideration, the NECWG has not responded.

**Definitions - General**

**Question 1:** *Are the proposed definitions, particularly the definitions for the terms, 'customer access network', 'core network', 'emergency call camp on functionality' 'emergency registration', 'mobile base station' and 'wilt' appropriate? If not, please provide an alternative definition and give reasons for doing so.*

NECWG Comment: Agree.

**Definitions – 'significant local outage'**

**Question 2:** *Is the definition of significant local outage proposed at section 6 workable? If not, please provide an alternative definition and explain your reasons for doing so.*

NECWG Comment: A delineation between a major outage and a significant local outage is valid. The NECWG proposes consideration of the six-hour duration before an outage is declared / identified.

It is the NECWG view that outages to the carrier networks of any duration may generate impacts to the community accessing Triple Zero. The NECWG acknowledge that the consequence of this could be a significant increase in the number of welfare checks (considered in latter questions).

Therefore, the NECWG proposes that further investigation is conducted to better understand the impacts of outages that fall within the proposed definition and for those that fall outside of the proposed definition, i.e. with a duration of less than six hours.

This would then allow analysis of the proposed definition to determine whether it is an appropriate measure.

**Question 3:** *Please provide data on the nature and volume of outages in telecommunications networks that would be captured by the proposed definition of significant local outage. Explain the impact of meeting the requirements under the proposed amendments in relation to significant local outages.*

NECWG Comment: In line with the previous comment, NECWG supports the provision of data both for durations of greater than or less than six-hours to analyse the implications prior to formalisation of the proposed definition. It is also proposed that this data should encompass a period of no less than twelve months.

The NECWG anticipates this information will be made available by the telecommunications carriers, and that as part of the analysis, information in relation to the number of missed calls that did or might have resulted in a welfare check being actioned should be included for analysis of potential impact.

## **Welfare checks**

**Question 4:** *Is the proposed definition of significant local outage likely to lead to more missed emergency calls requiring welfare checks and referrals to police services? If so, why? Please explain your answer.*

NECWG Comment: The NECWG considers the answer to this question may require the results of the analysis proposed in Questions 2 and 3.

It is regularly reported that Police services in Australia are challenged with the current demand placed on them, particularly when stations and officers are in rural, remote, and very remote areas. Any suggestion of increased demand on existing capacity may create subsequent

issues, both organisationally and from a community safety perspective. Similarly, the police are often asked to undertake tasks that might have otherwise been directed to another agency (e.g. Ambulance) if the caller had been able to contact Triple Zero.

**Question 5:** *Is the possibility of a greater impost on police services to follow up on failed welfare checks sufficiently balanced by the benefit of checking on the welfare of a person who has made an emergency call that failed during a major or significant local outage? Please explain your response.*

NECWG Comment: For all emergency services, the welfare of a person in need of emergency assistance is paramount. The request for emergency assistance is not always provided by the person involved and can be activated by another person, or in some instances, by autonomous devices such as medical alarms, however a critical component of emergency services response to requests for assistance includes understanding the situation of the caller, and the validity of the request as requiring an emergency response.

To support this, in the scope of welfare checks, the NECWG considers that a more structured process is required rather than handing off all welfare checks to police. The NECWG considers there is a role for the Telecommunications Carriers (or other body) to undertake a level of validation of the call that might include mechanisms to conduct their own welfare checks before escalating to police or other emergency service organisations thereby allowing the emergency services to focus on the most critical cases, and that on the basis of this validation, the welfare check should be directed to the most appropriate emergency service.

The NECWG considers that there could also be focus given to taking preventative action rather than reactive by establishing mechanisms to enhance the redundancy of carrier networks and/or the provision of alternate channels for people to contact Triple Zero. This may include, as noted in the Federal Government's announcement of the Universal Outdoor Mobile Obligation (UOMO), the access to Triple Zero via Low Earth Orbit and Direct to Device satellite services.

This proactive posture may take some time to realise, therefore in the interim, the consideration of validation and minimising the impact to emergency services in undertaking physical welfare checks is proposed.

## **Wilt mobile base stations**

**Question 6:** Is the wilting requirement appropriate to meet the requirements of the direction?

NECWG Comment: It is considered that the wilting of mobile base stations will assist but the NECWG consider it may be preferable to take a proactive posture in terms of resilience and continuity of service as noted in comments provided to Question 5.

**Question 7:** Are there circumstances where there should be an exemption from wilting a mobile base station? For example, where voice services may not be working but data services

are working, and it may be possible for an end-user to use the data services on their phone to seek assistance (but not by using the Triple Zero Emergency Call Service).

NECWG Comment – The Triple Zero service is, currently, a voice only access service. Until such time that alternate access services have been agreed and implemented, it is the NECWG consideration that there should be no exemptions to wilting. This will allow the person to call Triple Zero via a camp-on meaning we can establish a voice call to validate the situation to determine to most appropriate response. Noting that a camp-on call will not deliver Advanced Mobile Location information to Triple Zero.

However, this is only applicable where more than one carrier is available. Therefore, the access to data, if available, could be applied as an exemption, as it allows the person to contact others who can register the request for assistance via a voice call. This is obviously not the most efficient method and may create some confusion in both the monitoring and decision making associated with an outage, but in the face of no alternative, it will still allow a person to seek help.

The alternative, as noted above, may be to focus on taking preventative action rather than reactive by establishing mechanisms to enhance the redundancy of carrier networks and/or the provision of alternate channels for people to contact Triple Zero. This may include, as noted in the Federal Government's announcement of the Universal Outdoor Mobile Obligation (UOMO), the access to Triple Zero via Low Earth Orbit and Direct to Device satellite services.

**Question 8:** Are there specific conditions that should apply to the requirement to wilt mobile base stations during outages (other than the loss of connectivity between the mobile base station and the core network)?

NECWG Comment: No comment.

### **Exception to requirements**

**Question 9:** *Are there any additional relevant examples of matters that are beyond the control of the provider that may materially and adversely affect the provider's technical ability to meet the proposed new requirements?*

NECWG Comment: No comment.

### **Requirements under paragraph 6(1)(b) of the direction (share real-time network information relating to outages)**

**Question 10:** *Proposed section 78 is intended to apply when either a significant local, or major outage that affects the carriage of calls to the emergency call person for 000 and 112 occurs. Is this appropriate or should it apply only to major outages affecting the carriage of emergency calls? Please explain your answer.*

NECWG Comment: The NECWG considers the transparency of network information, particularly as it relates to outages that could impact access to Triple Zero, as critical in determining operational coordination and / or business continuity.

The NECWG also is conscious that there needs to be clear definitions and agreed practices on how the data can be used, and the response or accountability of organisations who are provided access to the data. For example, if an emergency service organisation receives the data at the same time as the ECP, then what actions are expected or the responsibility of either organisation on receipt of this information, and what are the consequences if they do not comply? Without clear delineation, there is risk of confusion, duplication, or further gaps in the service being exposed.

The NECWG proposes that further analysis of the organisations, the purpose of sharing, and the actions taken on sharing should be undertaken prior to formalising the amendments and may include the development of appropriate agreements / processes between parties on the matters noted.

**Question 11:** *Is the information specified in proposed paragraphs 78(3)(a) to (f) sufficient real-time information about a network outage to provide useful assistance for emergency service organisations in the relevant area impacted by the network outage and the emergency call persons for 000 and 112 and 106?*

NECWG Comment: The NECWG considers the listed items as appropriate.

**Question 12:** *Is there additional information about a network outage that should be specified as real-time network information? Please explain your answer.*

NECWG Comment: No comment.

**Question 13:** *As drafted, proposed section 78 requires carriers to share real-time information with emergency service organisations located in the relevant area impacted by the network outage. Is this sufficient, or should emergency service organisations nationally be given information about outages? For example, would it be useful for emergency service organisations in New South Wales to be given real-time network information about a significant local outage in south-east Queensland? Does it depend on the relative proximity of the emergency service organisations to the location of the outage? For example, would emergency service organisations in Western Australia want to receive information about outages in Tasmania? Is there value in receiving this information for situational awareness? Please explain your answer.*

NECWG Comment: Noting comments to question 10, if the information is to be shared directly with the emergency service organisations, then it is proposed that only the impact jurisdiction should be advised. This should be on a State basis due to the interoperability that many of the organisations have in their Triple Zero environments across their States.

Acknowledging there are some anomalies, it is NECWG's consideration that cross border coordination should be at the initiation of the impacted jurisdiction, and that national coordination should be held by the ECP.

The NECWG also notes the submission to the Commonwealth Government in response to the recommendation of the Bean Review into the 2023 Optus outage for the establishment of a Triple Zero Custodian. The NECWG anticipates that the Custodian, should it be endorsed, will have an active role and responsibility for the coordination of the response to outages, particularly major outages.

**Question 14:** *Are there additional stakeholders who should receive real-time network information under this section?*

NECWG Comment: The NECWG also notes the submission to the Commonwealth Government in response to the recommendation of the Bean Review into the 2023 Optus outage for the establishment of a Triple Zero Custodian. The NECWG anticipates that the Custodian, should it be endorsed, will have an active role and responsibility for the coordination of the response to outages, particularly major outages.

#### **Requirements under paragraph 6(1)(c) of the direction (reporting timeframes)**

**Question 15:** *Is 30 days an appropriate timeframe to prepare a report setting out the information in subsection 79(2)? If not, what would be an appropriate timeframe? Please explain your answer.*

NECWG Comment: The NECWG considers this an appropriate time for the majority outages noting that significant major outages may require extensive investigations.

#### **Requirements under paragraph 6(1)(d) of the direction (disruption protocol)**

**Question 16:** *Are there specific matters that should be set out in the disruption protocol in the ECS Determination? Please describe in detail those matters, giving reasons for your answer.*

NECWG Comment: The NECWG considers that this amendment should be considered in conjunction with the comments to for proposed amendments to paragraph 6(1)(b) (real time information sharing) and Section 73 (wilt mobile base stations) in that the disruption protocol may need to be applied for both major and significant local outages.

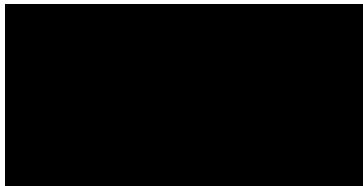
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**Requirements under paragraph 6(1)(e) of the direction (management plan for proposed changes to operations or networks)**

**Question 17:** Is 6 months prior to the proposed change an appropriate amount of time to submit the management plan to the ACMA? If not, please specify a timeframe and provide reasons why.

NECWG Comment: The NECWG considers 6 months as the point of submission to the ACMA as insufficient, particularly where there is both impacts to the ECP and downstream impacts to the emergency services organisations requiring changes to their systems and interfaces. It is expected many organisations will be aware of their change plans (including maintenance schedules) at least 12 months before implementation. To enable all stakeholders in the Triple Zero service to have sufficient time to undertake both approval and readiness activities for the proposed change, a notification of the proposed change at the same time as ACMA or no later than the date of ACMA's approval to proceed should be provided.

Sincerely



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