

Submission in response to ACMA consultation papers – “*Proposed amendments to the Telecommunications (Customer Communications for Outages) Industry Standard 2024*” and “*Emergency Call Service Determination – Proposed amendments to improve the operation of the emergency call service*”

NBN Co

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Introduction

nbn welcomes the opportunity to respond to the ACMA's Consultation Papers, '*Proposed amendments to the Telecommunications (Customer Communications for Outages) Industry Standard 2024*' (**Comms for Outages Standard**) and '*Emergency Call Service Determination. Proposed amendments to improve the operation of the emergency call service*'.

We appreciate the ACMA's consideration of nbn's views as it has worked through the detail of the Ministerial Directions provided for both instruments; and its willingness to hear feedback that will ultimately produce a practicable outcome for carriers, CSPs and impacted end users.

As the ACMA will be aware, nbn is a Government Business Enterprise (**GBE**) responsible for operating Australia's wholesale broadband network on a commercial basis. nbn must be commercially sustainable to support our ongoing investment in the nbn network, whilst looking to support Government policy objectives.¹ In the context of managing and communicating about unplanned outages on its network, nbn collaborates with Retail Service Providers (**RSPs**) and other stakeholders to improve processes where outages impact the nbn network and to minimise disruptions for consumers.² To fulfil our various objectives, we must ensure any system and process improvements can be achieved in an efficient and transparent manner.

nbn supports the intent of the Comms for Outages Standard, which aims to enhance the consistency and effectiveness of outage notifications. Our submission recommends the proposed rules consider existing arrangements for unplanned outages across the industry; and ensure the significant local outage definition be appropriately sized so that the focus of the Standard remains on those unplanned outages that have significant impacts to the impacted community. For example, nbn suggests increasing the Services in Operation (**SIO**) threshold for significant local outages from 1,000 to 10,000.

We note there is great variability in the types of outages that may occur across different networks. There are also varying degrees of visibility each provider has within a supply chain over a single network about the impact of an outage, including impact to the types of services each provider offers within that supply chain. nbn therefore encourages the ACMA to draft its second tranche of amendments in a way that both allows a provider to notify relevant to its specific services; but ensures end users and other stakeholders are not the recipient of conflicting messaging.

nbn acknowledges the importance of the Emergency Call Services Determination (**ECS Determination**), which focuses on providers supporting the successful carriage of 000 calls. nbn primarily supplies Layer 2 broadband ethernet services and has limited ability to identify whether broadband data via its access network includes voice call traffic, including 000 services from a retail VOIP service. nbn therefore requests the ACMA ensure new notification

¹ NBN Co, 2025 Statement of Corporate Intent, p4.

² NBN Co, 2025 Statement of Corporate Intent, p3.

and reporting requirements for carriers are flexibly applied so that carriers with limited visibility to the impact of outages on 000 calls, like nbn, can comply.

Our submission is structured as follows:

- Section 1 provides feedback on the proposed definition of ‘significant local outage’, which is relevant to both consultation papers.
- Section 2 responds to other questions set out in the Comms for Outages Standard consultation paper relevant to carriers.
- Section 3 responds to those questions set out in the ECS Determination consultation paper that are directed to fixed line carriers and therefore relevant to nbn.

1. Definition of significant local outage

Relevant questions from both Comms for Outages Standard and ECS Determination consultation papers:

- ***Is the proposed definition of significant local outage workable?***
- ***Does the definition adequately capture outages that are lesser in scale than major outages, but have a significant impact on local communities in the areas that may have lower levels of access to alternative telecommunications networks?***

The ACMA has proposed ‘significant local outages’ should be defined as:

“significant local outage means any unplanned adverse impact to a telecommunications network in a distinct location in regional or remote Australia used to supply carriage services to end-users, that:

- (a) results in an end-user being unable to establish and maintain a carriage service;
- (b) affects, or is likely to affect 1,000 or more services in operation;
- (c) is expected to be, or is, of a duration longer than 6 hours; and
- (d) is not a major outage.”³

nbn agrees that the significant local outage definition should be ‘clear and easy to apply in a short timeframe by carriers and carriage service providers who are also trying to diagnose and resolve the service outage’.⁴ An appropriate balance must be achieved between:

³ ACMA, *Draft Amendments - Telecommunications (Customer Communications for Outages) Industry Standard 2024*, p4.

⁴ ACMA, *Proposed amendments to the Telecommunications (Customer Communications for Outages) Industry Standard 2024 Consultation paper*, February 2025, p2.

- 1) giving end-users the information they need where there is a significant impact to their community. We note, for example, the ACMA’s requirements for a CSP are to “attempt to notify each of its end users affected or likely affected by the outage”⁵; and
- 2) setting rules that are practicable for industry to implement while not creating an overly large volume of varying information to the public, e.g. significant local outage information posted on CSP and carriers’ websites, about the same incident.

We understand that the Comms for Outages Standard is not *intended* to replace BAU arrangements for all unplanned outages but rather “... *those that cause significant disruption, including those that are lesser in scale but have a significant impact on local communities.*”⁶

Given this at the outset of this configuration it is important to note that nbn (and likely other carriers) already has well established unplanned outage notice arrangements with their downstream providers and will continue to follow these arrangements for all outages, including those that will also be covered by the definitions of ‘major’ or ‘significant local’ outages.

SIO threshold

nbn recognises individual end-users that are affected by any network outage will experience some impact, in the context of operating a national network.

nbn’s concern with the ACMA’s suggested SIO threshold of 1,000 is that it will capture outages that are currently adequately dealt with via nbn’s existing unplanned outage notifications to RSPs and other stakeholders. We are also conscious that, should the SIO threshold be set too low, it is likely to create a problem of over-reporting of outages to the public that are typically managed in the normal course of a carrier’s BAU activities.

nbn recommends the number of SIOs under this definition be increased to 10,000 or more services in operation.

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nbn acknowledges and appreciates the ACMA’s intention that, for carriers, the requirement to provide notices about significant local outages should be limited to a smaller range of notification channels, including notices to the public via a carrier’s website, notice to other carrier and CSPs, and to relevant stakeholders. We note that notices for outages captured by the proposed definition will create an additional weekly flow of outages communications, including updates and any final notice of rectification. Depending on the extent and cause of an outage and the length of time needed to rectify, there will be multiple notices for each outage count, thereby increasing the level of resources needed to manage.

⁵ ACMA, *Draft Amendments - Telecommunications (Customer Communications for Outages) Industry Standard 2024*, section 12A(1)(a), p8.

⁶ ACMA, *Proposal to make the Telecommunications (Customer Communications for Outages) Industry Standard 2024 Consultation paper*, September 2024, p2.

Distinct Location

nbn supports the use of the term ‘distinct location’ in the proposed definition of significant local outage. We understand the intent of this term is to clarify that the ‘significant local outage’ definition should not be applied to capture a sum of several smaller outages in different townships or communities across a region. Rather, the definition should be applied by reference to an unplanned event that occurs within one identifiable geographic area.

For these reasons, nbn suggests it would also be useful to add ‘distinct location’ to the major outage definition. If the reverse logic was to be applied and the major outage notification requirement triggered because of three separate incidents across a state, the scale of the outage, restoration times and locations for an incident would dilute the relevance for customers and create confusion.

Regional and remote Australia

nbn acknowledges the objective for significant local outages, as stated in the ACMA’s Ministerial Direction, is to capture “outages that are lesser in scale than major outages but have a significant impact on local communities, for example due to the geography of the area and resulting impact of the loss of connection, whether the area is regional or remote, and the extent to which it is serviced by alternative networks. The ACMA should consider reasonable formal approaches for definition local areas, including those used by the Australian Bureau of Statistics and Australia Post.”⁷

If the ACMA determines that one measure should apply the same definitional threshold across all carriers’ networks and CSPs, the ABS Remoteness Structure is a readily available data set. nbn proposes the geographic area defined as ‘Inner Regional Australia’ be removed to alleviate the need for larger outer urban areas to be captured by these new provisions. End-users in these locations are more likely to have alternative communication options available to them. Exclusion of the Inner Regional Australia area would assist in notifications under both Comms for Outages Standard and the ECS Determination being appropriately targeted to communities in remote areas in accordance with the objectives of the Direction.

Clarification on measuring definitions for outages

nbn understands the reference in the proposed definition to ‘any unplanned adverse impact’ to a network is intended to be applied to a single event or cause (or directly linked causes or events) within a contained geographic area that then triggers the relevant criteria (e.g. SIO threshold). However, this is not clear in the proposed drafting.

For example, in the case of an outage caused by floods, as flood waters recede over a number of days or travel through a river system, the number of services impacted will fluctuate; as will the progressive restoration of services.

⁷ Explanatory Statement for *Telecommunications (Customer Communications for Outages Industry Standards) Direction 2024*, p5.

The calculation of cumulative service outages over the lifecycle of a flood incident does not represent a near real time picture of an outage, what is being managed or should be communicated to customers. For example, if an incident reaches 100,000 impacted services, cumulatively, on the fifth day of a slow-moving flood event, reporting on the incident as a single ‘significant local outage’ event could be unhelpful, misleading and inaccurate.

Adding up service impacts over a number of disparate incidents may also be confusing to customers and complicates reporting on individual incidents.

Where the definition is applied to outages that have been caused by natural disasters and emergency weather events, clarification of the ACMA’s intent will be particularly helpful for responsible carriers and CSPs to appropriately react and achieve compliance.

Therefore, we request the ACMA consider clarifying that the number of impacted SIOs used as the reporting threshold is as at a point in time (or concurrent) and resulting from a single event or cause or directly linked series of events. This clarification could be achieved in the relevant explanatory statements or within the instruments themselves.

2. Feedback on amendments to *Telecommunications (Customer Communications for Outages) Industry Standard 2024*

In this section of our submission, nbn responds to remaining questions in the ACMA’s Comms for Outages Standard consultation paper relevant to nbn.

Outages caused by natural disasters

Question 3: Are there concerns about the imposition of requirements on carriers and CSPs in relation to outages caused by natural disasters? If yes, please explain.

nbn considers there is merit in providing end-users with information that informs them of whether their nbn service has been impacted by an unplanned outage as a result of a natural disaster.

We note the new requirements in this second tranche for Divisions 1 and 2 of the Comms for Outages Standard will mean that carriers must:

- give notice of the outage to other carriers and CSPs they have a commercial arrangement with to supply carriage services;
- provide information on their website, including posting updates on the status of the outage and a final notice of rectification; and
- notify relevant stakeholders, including the ACMA, the Department, the TIO and emergency call persons (ECPs).

nbn is supportive of the ACMA’s decision not to require notice of major outages caused by natural disasters to be provided via social media or other media channels.

As the overall information flow about network impacts from a natural disaster is released by both carriers and CSPs, it will be important to recognise that not all notifications through the supply chain will disclose the same information. Carriers and CSPs in turn offer different types of services. As a result, there unlikely to be complete consistency across the notices provided by different entities through the supply chain. For example, nbn will be able to advise of the scale and types of services impacted it supplies, that is the wholesale broadband services supplied using its different access technologies. However, only other carriers and CSPs will be able to identify if another retail carriage service is supplied to an end-user over the top of the wholesale broadband service and whether these services are similarly impacted.

It is also likely to be challenging for carriers and CSPs to notify or communicate certain information listed in subsection 13(1) in respect of outages caused by a natural disaster or other incidents where these causes are outside a carrier's control (such as a power infrastructure outage). For example, information regarding estimated timeframes for rectification or updates of rectification progress in these cases is likely to be largely outside of the control of the impacted CSP or carrier, and there should be recognition that the ability of CSPs and carriers to provide updates on this may be limited.

It may be helpful for the ACMA to indicate in its Explanatory Statement that it is understood (and therefore assessment of compliance will be taken into account) that:

- 1) there will be some variance in content provided under s13(1) of the Standard which will depend on the service each entity provides under their commercial arrangements; and
- 2) there will be updates that are dependent on other factors outside the telecommunications industry's control. Therefore, advice on material changes and rectification updates may be limited.

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Additional/alternative requirements

Question 7: In relation to the draft amendments to the standard:

- ***Are there any additional matters aligned to the objectives that should be included but have not been?***
- ***Are there any matters that have been included for which alternative arrangements should be considered?***

nbn has identified the following matters for clarification from the ACMA.

Clarification on when an outage can be considered closed and a final rectification notice issued

Where network restoration is needed due to damage created by a natural disaster, carriers and CSPs will typically prioritise restoring services to end users wherever possible, including applying

temporary solutions while the longer-term activity to rebuilt or repair infrastructure can be achieved. For fixed networks, this also pre-supposes that individual premises are in a fit state to restore services to.

For an infrastructure provider, ‘fully rectified’ can have different meanings, including for example whether there is an expectation that the term ‘fully rectified’ would include rectification of all components of the underlying network infrastructure. This term may be differently interpreted and applied by a CSP when an end user’s service is restored, regardless of the rectification methods applied by their underlying infrastructure provider.

nbn considers the Standard should be focussed on the impact to end-users. Therefore, a carrier’s recovery and repair phases of a natural disaster response should be treated separately to an initial outage response and service rectification process. Where outages are caused by physical damage to network infrastructure or systems as a result of a natural disaster, temporary network infrastructure or other redundancy measures may be applied to enable restoration of carriage services as quickly as possible (and in the case of fixed carriage services, this assumes an end user’s premises is similarly in a fit state to receive them). Once a temporary infrastructure solution is implemented, an end user’s service is typically made operational. nbn considers this would be the appropriate point to consider the outage closed.

There is little benefit to end users and other stakeholders to continually receive notices that are no longer relevant to their circumstances or for carriers and CSPs to unnecessarily expend resources on updates about infrastructure build activity which can take many months to complete where the immediate impact to end users has been resolved.

Accordingly, nbn suggests the ACMA amends the current subsection 15(2) of the Outage Standard as follows:

“...all services affected by a major outage or a significant local outage have been restored ~~or~~ fully rectified...”

Similar language would also need to be reflected in subsection 14(2).

3. Feedback on amendments to *Telecommunications (Emergency Call Service) Determination 2019*

In this section of our submission, nbn responds to remaining questions from the ACMA’s ECS Determination consultation paper that are relevant to nbn.

As the ACMA will be aware, in our capacity as the default SIP, nbn is required to ensure its fixed-line and fixed wireless networks are capable of supplying broadband and voice-capable services to end users via our RSPs (the voice-capable component does not apply in the satellite footprint). However, nbn is not required to (and does not) directly sell wholesale voice carriage services.

The ECS Determination focuses on the carriage of 000 calls. nbn primarily supplies Layer 2 broadband ethernet services and has a limited ability to identify whether broadband data via our access network also includes voice call traffic of any nature including 000 services from a retail VOIP service.

An outage on nbn's network may or may not impact an end user's ability to make voice calls, including those to 000 services, depending on the arrangements the RSP has made with their end users to make available alternative means of providing a voice call. nbn does not have visibility of these arrangements. Nor does nbn have visibility of the types of voice traffic a carrier provides, including whether a call to a 000 service has been made.

We respectfully request the ACMA consider this important context when setting new obligations that prescribe specific detail about impacts to 000 calls and whether this should be provided by all carriers to their stakeholders.

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 impost of meeting the requirements under the proposed amendments in relation to significant local outages.

nbn currently provides notices of significant network disruption to the ACMA, the ECP and nominated ESOs under the current rules set by the ECS Determination and the and Emergency Call Services Requirements Industry Code. If this existing process is to be replaced with the new requirements to provide requirements outlined under section 78 (as discussed below), nbn anticipates the volume of outages that would be captured would be the same for those same outages captured by the Comms for Outages Standard. In the same vein the impost for meeting these requirements would also be the same across both instruments.

Sharing real-time network information

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.

nbn supports the approach proposed by the ACMA that allows information provided to emergency service organisations to be consistent with the information provided by carriers and CSPs to their customers, the public and other stakeholders under the Comms for Outages Standard.

As providers identify and then take action to rectify a network outage, particularly those that are of a significant impact to the community, it will be much more practicable and efficient to provide one consistent notice to all stakeholders and within the same timeframes as updates about the outage become available.

Should additional or more frequent data be required to be provided, those additional arrangements would need to be governed by individually negotiated contractual arrangements with each state-based ESO to ensure they are able to ingest the information offered from each carrier. nbn notes the ACMA is not in a position to apply telecommunications regulation to ESOs as the recipient of the information under section 78. Therefore, it would not be appropriate to regulate a solution that requires data coordination when only one sector is subject to the regulation.

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?

The information prescribed under 78(3)(a) to (f) of the ECS Determination must be shared with ECPs, ESOs, the ACMA and the Department. With the exception of ESOs located in the State of Territory that has been impacted by the relevant outage, all other stakeholders will be sent notices about the same outage under the Comms for Outages Standard. From a carrier perspective, it is unnecessary for the two instruments to prescribe slightly different information to the same entities.

nbn notes the Explanatory Statement in support of the Ministerial Direction provided to the ACMA about the Comms for Outages Standard stated “*when designing obligations on carriers and carriage service providers to share information, including with ‘other stakeholders’, the ACMA should ensure there is appropriate synergy with actions to implement other recommendations from the Optus Outage Review that also have information sharing components – including to avoid inappropriate overlap, duplication or inconsistency.*”⁸ In this context the matching of the notification requirements under section 78 of the ECS Determination to those outlined in the information requirements under section 13 of the Comms for Outages Standard is appreciated.

As noted above, there will already be variance in the information provided to relevant stakeholders on the notices provided by carriers and the notices provided by CSPs. For example, nbn will report what it knows about the impact a network outage has on the premises and relevant wholesale broadband access services it provides to retail providers. In turn, RSPs will need to identify the types of retail carriage services impacted by this same outage will be obligated to provide its customer base and to its relevant stakeholders, including fixed voice services and specific call carriage.

It may be helpful for the ACMA to assist the telecommunications industry in educating ESOs on why there will be variance that will inevitably be shown across all the notices that will be made publicly available, to ESOs and to end users, even for the same outage.

⁸ Explanatory Statement for *Telecommunications (Customer Communications for Outages Industry Standards) Direction 2024*, p7.

Question 12: Is there additional information about a network outage that should be specified as real-time network information?

During the course of an emergency event, including where a natural disaster has driven large scale telecommunications outages, nbn and other carriers have Emergency Management Liaison Officers on the ground working directly with ESOs to coordinate crisis responses across sectors. This activity is over and above the minimum notification requirements driven by the ECS Determination and the Comms for Outages Standard and is geared to respond to each emergency situation as it unfolds. We believe the mechanisms that are in place for significant emergency events do not require further information or regulation.

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? Does it depend on the relative proximity of the emergency service organisations to the location of the outage? Is there value in receiving this information for situational awareness?

Given emergency service organisations are established on a per state basis and typically fall under jurisdiction of State and Territory Governments, nbn suggests provision of outage information about events in another state will not be relevant to them. As a minimum requirement under the Determination, nbn supports the ACMA's requirement to share information under section 78(2)(c) "*an emergency service organisation located in the State or Territory affected by the major outage or significant local outage.*"

There may be specific outages that impact services across state boundaries, e.g. the 2020 bushfires in northern Victoria and southern NSW. If this type of natural disaster was to occur again, carriers have the option of engaging ESOs in both jurisdictions given both states are impacted. Similarly, should a carrier experience core network outages that impact all services, the proposed wording under section 78(2)(c) would still be applicable.

For other ESOs not impacted by a specific outage, relevant notices that are published online would be accessible to the public, including individuals from their organisations.

From a very practical perspective, if ESOs advise they wish to receive information about outages that are occurring in areas not within their jurisdiction, as long as the notice remains the same for all, it should be a relevant simple matter to include their contact details in the group notice that will be provided.

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

nbn believes the stakeholders identified under section 78 of the Determination, that is, the ECPs, ESOs, the ACMA and the Department are sufficient.

Reporting to ACMA and the Department

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?

nbn suggests 45 days after the restoration of an outage is preferred, rather than 30 days proposed, to ensure all internal investigations and management approvals can be completed before the deadline. However, the timeframe to provide such a report is not the most pressing concern for nbn.

While nbn may fall into the scope of being a carrier that has a major outage on its network, we would not be able to comply with subclauses (c) – (e) under section 79 where it refers to the delivery of emergency calls to the ECP, an estimated number of end-users impacted by an outage, or the number of unsuccessful calls made during an outage.

For example, when attempting to respond to “(c) the impact of the major outage on the delivery of emergency calls to the emergency call person for 000 and 112”, nbn cannot know whether an outage on nbn’s network in an affected area is serviced by another technology or another carrier delivers voice calls to 000 or 112. RSPs often supply end users with a fixed broadband modem that offers a fail-over option to provide access to an alternative mobile network to carry calls and data.

Voice carriers and CSPs who supply voice services over the top of nbn’s broadband access network will be able to identify if any delivery of calls has been impacted and which type of calls have been attempted. nbn does not. As a result, nbn would have to make some broad general assumptions on the basis that an outage impacted voice services without having the visibility to be able to comply with this requirement in full.

nbn may provide an indication of active wholesale nbn services in operation in response using a similar measure to the calculations we would take to determine if a major or significant local outage was in train. When seeking to comply with “(d) an estimate of the number of end-users affected by the outage” but we are unable to identify the number of end-users using carriage services over the nbn service at that premises.

nbn suggests that additional flexibility be applied to:

- (f) “...the steps that were taken to resolve issues identified as contributing to the outage; and
- (g) a clear and detailed plan (the Outcomes Plan), including timelines, outlining the steps that will be taken by the carrier to avoid similar outages from occurring in the future.”

These clauses assume that the cause of an outage in all cases is something that could have been avoided by a carrier. This is not the case.

Where an outage is due to causes that are outside of a carrier’s control, there can be limited information a carrier can use to advise of a plan or timelines. For example,

- outages caused as a result of natural disasters,

- commercial power outages (regardless of whether triggered by a natural disaster or not),
- vehicle strikes on network facilities,
- physical security incidents or third-party damage to infrastructure, force majeure events.

In principle, nbn is willing to provide a report to the ACMA and the Department about the outcome of a major outage on nbn's network where we are able to provide details about the wholesale broadband services that were impacted and the steps taken to rectify the cause of the outage. However, we request that section 78 be amended to allow carriers more flexibility on what they must report, particularly in circumstances where they, like nbn, only have visibility of a portion of information about the impact to emergency call services.

nbn suggests there may be two options available for the ACMA to address the concerns above. It could either:

- 1) Make the information required to be included in these reports more generic so that all carriers could meet the terms regardless of their place within the carriage services supply chain; or
- 2) Alternatively limit the application of this section to those carriers who directly supply carriage of voice services to CSPs or end users and who have visibility of specific call traffic.

Disruption protocol

Question 16: Are there specific matters that should be set out in the disruption protocol in the ECS Determination?

We note the proposed protocol under section 81 and Schedule 1 is high level and largely reflects other sections of the ECS Determination and Comms for Outages Standard that oblige carriers and CSPs to provide information to relevant stakeholders. Noting that the ACMA has been required by 6(1)(d) of its Ministerial Direction to include a disruption protocol section in the ECS Determination, there is little benefit in duplicating rules across the different instruments.

In keeping with comments express above, it would be helpful from nbn's perspective to clarify which carriers and CSPs should provide updates under the protocols about the impact to voice carriage services and impacts to the ability to access a 000 service. Part 1 – Protocols for carriers, clause 2, for example, should specifically apply to mobile carriers. The note underneath provides some clarification, but further qualification should be applied to the substantive clauses.

Management Plan

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

We note that s80(1) appropriately limits a ‘significant change’ to be only those that fundamentally and adversely impact the carriage of an emergency call. nbn appreciates the clarifying note the ACMA has included under section 80(1) to provide guidance on the scale of network or operational change the ACMA is contemplating.

nbn suggests that other than assessing an impact to Layer 3 voice services in general, any significant change to nbn’s operations or networks that specifically impact the carriage of an emergency call may not be known in detail.

While it would certainly be possible to advise the ACMA of relevant changes nbn may be contemplating, we suggest 6 months is quite a lengthy period prior to any launch date. There may be high level plans that are in train at that stage. The detail of plans, e.g. customer engagement strategies, may not have been finalised and, for nbn, subject to other industry consultation prior to any implementation. We assume this may be the reason why s80(5) requires carriers to provide updates every 45 days, however this may be too prescriptive as a minimum standard.

Conclusion

In conclusion, nbn supports the ACMA’s efforts to improve the Comms for Outages Standard and the Emergency Call Service Determination. We believe that the suggestions we offer in our submission will enhance the clarity and effectiveness of outage notifications, ensuring that end-users receive timely and relevant information while balancing additional costs and additional processes requested from the telecommunications industry. We appreciate the opportunity to provide our feedback and look forward to continued collaboration with the ACMA to achieve these important objectives.

nbn would be pleased to meet with the ACMA National Interest team to discuss any of the feedback raised in this submission. Please don’t hesitate to contact Xanthe Corbett-Jones at xanthe.corbett-jones@nbnco.com.au in the first instance.