



# Country Women's Association of NSW

*Incorporated in 1931 by an Act of NSW Parliament*

ABN 82 318 909 926

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The Manager  
National Interests Section  
Australian Communications and Media Authority  
PO 13112 Law Courts  
Melbourne Victoria 8010  
Via Online Submission: [Here](#)

## **Re: Improving the emergency call service during outages**

The Country Women's Association of NSW (CWA of NSW) welcomes the opportunity to provide feedback on the *Telecommunications (Emergency Call Service) Amendment Determination 2025 (No. 1)*. As Australia's largest women's organisation with a significant membership base in regional, rural, and remote (RRR) areas, CWA of NSW recognise the importance of ensuring the reliability of the *Triple Zero (000) emergency call service* during network outages.

The CWA of NSW acknowledge the intent of these amendments to improve network resilience and emergency call access, particularly in response to the 2023 Optus outage and have identified the following areas where the proposed changes may unintentionally disadvantage people living in RRR communities and offer the following recommendations:

### **1. Threshold for a "Significant Local Outage"**

The current definition of a significant local outage requires at least 1,000 services to be affected for more than six hours before carriers must report or act. This threshold leaves many RRR communities vulnerable, as they often have fewer than 1,000 connections. As a result, they could experience complete service loss without triggering mandatory reporting or response measures.

The consultation paper highlights this risk: *"Smaller communities are likely to be more vulnerable if a network outage occurs because the lack of alternative infrastructure can mean that there are no alternative mobile networks available to carry emergency calls from mobile phones using emergency camp-on capabilities."*

The definition of a significant local outage should account for factors like geographic isolation and the availability—or lack—of alternative telecommunications networks. Smaller-scale outages can have a disproportionately severe impact on isolated communities. CWA of NSW support the use of the Australian Statistical Geography Standard (ASGS) to identify these communities using the categories of inner and outer regional, remote and very remote.

**Recommendation:** The threshold for regional/remote areas should be reconsidered, possibly reducing the 1,000-service threshold and taking account of factors like geographic isolation and the availability—or lack—of alternative telecommunications networks to ensure that smaller communities are not disproportionately affected by outages.

### **2. Impact of Wilting Mobile Base Stations**

During the National Optus network outage (8 November 2023), its 4G and 5G base stations automatically shut down ("wilted") when they lost connectivity to the core network. This was intended to force user devices to switch to other available networks for emergency calls. However, 3G base stations remained active, still emitting signals despite not providing service.

Because 3G radio units maintained a voice channel connection—though calls could not reach Triple Zero—some devices mistakenly attempted emergency calls through these towers instead of switching to another network. These calls failed, receiving an error signal indicating the Optus network was not operational.

An outcome of the post Incident Review undertaken by the Department of Infrastructure, Transport, Regional Development, Communications and the Arts resulted in a regulatory requirement that network operators "wilt" towers when they lose connection to the core network, ensuring emergency calls can be carried by other networks and the vulnerability identified in the Optus Network Outage was addressed.

This approach may however result in a complete communication blackout in some RRR areas where only one carrier is available. Even if a mobile base station cannot connect to the core voice network, it may still be able to provide value to local communications, including data and emergency coordination.

**Recommendation:** The amendment should permit alternatives to automatic wilting, allowing carriers to maintain limited local connectivity via base stations where possible and safe to do so. Alternatives to wilting should only occur if it can be guaranteed that mobile devices automatically switch to another network for emergency calls when base stations lose core network connectivity.

### 3. Emergency Call Camp-On Functionality and Coverage Gaps

In RRR areas, where only one carrier operates, users can be left without any network access in an emergency. While the amendment requiring carriers to enable emergency call camp-on functionality is a positive step, it only applies when a carrier's network is down, leaving gaps where no alternative network exists. Carriers argue that temporary disaster roaming is too complex, costly, and risks overloading networks. However, successful international examples show that limited emergency roaming can be implemented effectively. Australia must prioritise solutions that maximise connectivity for RRR users, ensuring they can access any available network to make an emergency call when it matters most.

**Recommendation:** The amendment should ensure that universal emergency call roaming is always enabled for RRR remote locations, irrespective of a particular carrier's network status, to guarantee maximum connectivity to RRR users in emergencies.

### 4. Real-Time Information Sharing and Public Awareness

In December 2024 new rules came into effect requiring carriers to prioritise customer communication during major outages affecting 100,000+ services. Under these rules carriers must provide updates via websites, media, and call centres, with notifications soon after an outage and every six hours for the first 24 hours. Updates must include affected areas, cause, impacted services, and estimated resolution time. As stated in the consultation paper the proposed amendments are consistent with these and strengthen the requirement of carriers to share real-time outage information with relevantly located emergency services providers, the emergency call person for 000 and 112 and other appropriate entities.

**Recommendation:** The CWA of NSW supports the amendments and recommends that commonsense interpretation would determine the geographic extent of the notifications.

The CWA of NSW appreciate ACMA's consideration of these comments and would welcome further engagement on this important issue.

Yours faithfully,



Joy Beames President