



NSW Police Force

13 March 2025

The Manager
National Interests Section
Australian Communications and Media Authority

Dear Mr Nicholas,

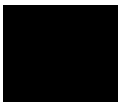
RE: Proposed amendments to improve the operation of the emergency call service – Consultation paper

As the Commander of Technology and Communication Services for the NSW Police Force, I am pleased submit our submission on the proposed changes by ACMA to enhance emergency call services.

The NSW Police Force, serving 31 police area commands and 26 police districts across metropolitan and regional NSW, recognises the importance of reliable emergency communications. The proposed changes, particularly the requirement for welfare checks on missed emergency calls during significant local telecommunications outages, will impact our resources and capacity. This includes our Triple Zero communications response and the operational demands on police in remote and rural areas.

While we support measures to ensure public safety, it is essential that telecommunications carriers maintain robust networks to prevent undue pressure on emergency service organisations (ESOs). Thank you for considering our perspective. We look forward to your response and any further information you can provide.

Yours sincerely,



Assistant Commissioner Stacey Maloney APM
Commander, Technology & Communication Services Command

Technology & Communication Services Command

Sydney Police Centre, 151 Goulburn Street, Surry Hills NSW 2010

[W www.police.nsw.gov.au](http://www.police.nsw.gov.au)

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13 March 2025

The Manager
National Interests Section
Australian Communications and Media Authority

national.interests@acma.gov.au

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

Dear [ACMA Representative],

I am writing in my capacity as the Commander, Technology and Communication Services for the NSW Police Force.

The NSW Police Force acknowledges the importance of public safety and supports measures that enhance the reliability of emergency call services. As at 30 June 2024 there were 31 police area commands in three metropolitan regions and 26 police districts in three regional NSW regions, delivering policing services to Communities.

It is anticipated that the proposed changes outlined by ACMA will have a level of impact on police in relation to the requirement for police to conduct welfare checks on missed emergency calls during significant local telecommunications outages. The extent of this impact requires further information for consideration. This impact includes both resource and capacity considerations for the NSW Police Force Triple Zero communications response, and increased demand on operational police managing multiple incidents in remote and rural areas. This impact does need to be 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.

In an environment of increasing demand on emergency services, any proposed changes must ensure that relevant obligations sit with telecommunications carriers to ensure that responsibility for the provision of robust telecommunication networks rests with carriers and not emergency service organisations (ESOs).

I respond to the following questions:

Definition of significant local outage- Response to question 2

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.

Comment: PoliceLink Command note the current definition of a Major Outage under the Telecommunications Act 1997 and the proposed introduction of a Significant Local Outage.

Major outage means any unplanned adverse impact to a telecommunications network used to supply carriage services to end-users that:

- (a) results in an end-user being unable to establish and maintain a carriage service; and
- (b) affects, or is likely to affect:
 - (i) 100,000 or more services in operation; or
 - (ii) all carriage services provided by a carrier or carriage service provider in a State or Territory; and
- (c) is expected to be, or is, of a duration longer than 60 minutes.

Significant local outage means any unplanned adverse impact to a telecommunications network in a distinct location in regional or remote Australia that is 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.

In order to comment on whether the definition of a significant local outage is workable, it is requested that additional data gathering, and analysis be undertaken for outages that fall within the proposed definition to better understand the potential impact prior to implementation. This should include the number of welfare checks that would be required to be performed by the telecommunications carrier, those escalated to an ESO where contact is made, and those that are currently escalated to police where no contact is made.

We also note the definition of a Major Service Disruption as outlined in the Communications Alliance Ltd INDUSTRY GUIDELINE G663:2022 Telecommunications – Emergency Communications Protocol.

INDUSTRY GUIDELINE G663:2022 includes the definition of a Major Service Disruption as a large-scale loss of connectivity from any point in a communications network that supports or delivers services to businesses and consumers.

It is suggested that Industry Guideline G663:2022 will need to be amended to align to the definitions of Major Outage and Significant Local Outage under subsection 125AA(1) of the *Telecommunications Act 1997* should they be endorsed, in order for stakeholders to have one clear set of definitions to follow.

Welfare checks- Response to question 4 and 5

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.

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.

The ACMA is proposing that welfare checks on missed emergency calls would be required when a major or significant local outage occurs (and removing the definition of ‘significant network outage’ previously included in the determination). This means that police services in each state and territory of Australia may be impacted by potentially increased referrals from carriage service providers that have failed to contact an end-user in the event of a missed emergency call during a significant local outage.

Comment: Noting the expansion of the definition of an outage from *100,000 or more services in operation affected for more than 60 minutes* to *1,000 or more services in operation affected for more than 6 hours*, it is anticipated that under current processes, police will be requested to respond to additional requests for welfare checks. This requires validation using data as recommended in response to question 2.

Consideration should also be given to the impact of an incident being defined as a Significant Local Outage up to 6 hours after it began and the delay in telecommunication carriers performing welfare checks on missed emergency calls made during that window.

Section 8 of The Triple Zero Disruption Protocol (TZPD) version 6, authored by Telstra as the ECP relates to welfare checks. The document states:

The purpose of a Welfare Check is to ensure the safety and welfare of emergency Callers who initiated call/s to the ECS during an ECS Disruption, and the call/s were unsuccessful in reaching the ECP.

Welfare Checks will be conducted by the ECP / ECP Representatives for those calls identified as unsuccessful in reaching the ECP during the ECS Disruption. The ECP / ECP Representative should contact unsuccessful Callers as soon as possible and ensure that each Caller found an alternate contact method to communicate with the relevant ESO and that assistance was provided if required. If this was not the case and assistance is still required at the time of the successful Welfare Check contact, then the ECP agent will organise immediate assistance with the appropriate ESO.

The TZDP provides several guiding principles for ECP/ECP Representatives, including the number of contact attempts to be conducted by the ECP within a specified time frame before referring to police. ACMA have access to the full details outlined in the TZDP.

While the TZDP provides guidance to the ECP, PoliceLink Command are not aware of any consistent guidance or requirements provided to telecommunication providers more broadly in terms of the number of welfare contact attempts to a caller who could not connect with Triple Zero, the method of contact, or the timeframes that these checks are conducted within.

Existing practices result in welfare checks being escalated to police where contact cannot be made. The proposed amendments also provide an opportunity to review the most appropriate escalation point/organisation for welfare checks. Evidence has shown that in several cases, police are not the most appropriate or required ESO for the person requesting assistance.

IGN 018 requires the following information to be provided in a request for a welfare check:

- Incident Summary (including impact to customers);
- Number of Customers Impacted;
- Estimated Time of Restoration; and
- Contact Person/s for further information requests.

Welfare checks should contain sufficient information to identify the name/business name, address and contact phone number for the caller when escalating.

Integrated Public Number Database (IPND) information should be provided along with the phone number in all instances. Additionally, it is suggested that telecommunications carriers should have access to the IPND through appropriate channels to support welfare checks.

Customers should be compelled to update the IPND or interfaces developed where new customers (or address change) details are automatically uploaded to the IPND.

Requirements under paragraph 6(1)(b) of the direction- Response to questions 10- 14

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.

Comment: The provision of information relative to network outages that could impact access to Triple Zero is relevant. A communications and accountability framework is required to support this in order to confirm who is provided the information and any required actions and accountabilities.

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?

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

Comment: Communications Alliance INDUSTRY GUIDELINE G663:2022 includes the definition of a Major Service Disruption as a large-scale loss of connectivity from any point in a communications network that supports or delivers services to businesses and consumers.

Additionally, Appendix D of the guideline provides a Major Service Disruption notification template that includes information that will be provided to stakeholders in the event of a Major Disruption. In addition to paragraphs 78(3)(a) to (f) of the Telecommunications (Customer Communications for Outages) Industry Standard 2024, the template provides additional information including the next expected update and contact officer details.

The Triple Zero Disruption Protocol version 6, authored by Telstra as the ECP, also contains information in relation to Communication Principles where there is an Emergency Call Person disruption. The protocol states that where there is an ECS Disruption, the ESOs, Carrier/CSPs and the ECPs for 000/112 and 106 will work closely together as required to minimise the impact on the operation of the ECS to the community.

It is recommended that the proposed amendments to the subsection 125AA(1) of the *Telecommunications Act 1997* outlined by ACMA will also require a review of the TZDP and Communications Alliance INDUSTRY GUIDELINE G663:2022 to ensure alignment, confirmation of responsibilities, information to be shared, and with who.

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.

Comment: It is proposed that only the emergency service organisations located in the relevant area impacted by the network outage should be advised. Where an outage may impact the Triple Zero communications network more broadly, it may be more appropriate to channel that information through the ECP or the proposed Triple Zero Custodian suggested as part of the Bean Review into the 2023 Optus outage.

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.

Comment: It is suggested that further analysis is required as outlined in comments to question 2, 4 and 5 to understand the impact of the proposed definitions and requirements for the ECS/ECP, ESOs and telecommunication carriers. Additionally, the proposal has identified the need for development of consistent and feasible frameworks to support communications and response to outages. The adoption of recommendations from the Bean Review may also have some impact on timelines, with the need to implement the Triple Zero Custodian to support ACMA's proposed amendments.

Yours sincerely

Assistant Commissioner Stacey Maloney APM
Commander, Technology & Communication Services Command