

## Talking Points – potential investigation of Optus Outage 18 September 2025

### Investigation Focus

The ACMA will investigate Optus compliance with the following regulations:

- [Telecommunications \(Emergency Call Service\) Determination 2019](#)
- [Telecommunications \(Customer Communications for Outages\) Industry Standard 2024](#)
- [Industry Code C536: Emergency Call Service Requirements](#)

### Telecommunications (Emergency Call Service) Determination 2019

The ECS Determination requires telcos to ensure that emergency calls are successfully carried to the Emergency Call Service.

The investigation will examine Optus compliance with:

- **Section 11- Networks** - requires carriers and carriage service providers (CSPs) to maintain, as far as practicable, the proper and effective functioning of their controlled networks and their controlled facilities that are used for the carriage of emergency calls to the Emergency Call Service.
- **Section 14 – Carriage service providers must ensure controlled networks and controlled facilities give access to end users** – requires the network to be configured to ensure end-users have access to emergency call services (this is a single breach provision).
- **Section 15** – requirement to give every end-user who makes an emergency call access to the Emergency Call Service (this section could have multiple breaches, one breach for each customer unable to connect to Triple Zero).
- **Section 19** – requires the CSP to ensure that that an emergency call made using the service is carried to the relevant termination point for the call (the relevant termination point in this case is the point of interconnect between the Optus network and the Telstra network for receipt of emergency calls).
- **Section 27 – Notification requirements – significant network outages** - CSPs experiencing a Significant Network Outage must, as soon as possible after becoming aware of the outage, notify, or arrange to notify the Emergency Call Person for 000 and 112, and the Emergency Call Person for 106; and each CSP in relation to whom the carrier or CSP has an obligation to provide access under section 10 (their resellers).
- **Section 28 – Welfare checks – significant network outages** – requires a CSP, as soon as practicable after becoming aware of a Significant Network Outage, or being notified of a Significant Network Outage, to undertake, or arrange to be undertaken, a welfare check on an end-user who made an unsuccessful emergency call during the outage.

### Telecommunications (Customer Communications for Outages) Industry Standard 2024

The communications for outages standard commenced on 31 December 2024 for major outages and 30 June 2025 for significant local outages.

In a major outage or a significant local outage, a telco must communicate information about the outage to:

- Customers and the public
- Other carriers and carriage service providers
- Relevant stakeholders (the ACMA, Dept, NEMA, TIO, Emergency Call Persons for 000/112 and 106).

Telcos must also:

- put relevant and up-to-date information on their website
- keep customers up to date using methods including apps, email, SMS, other media, call centres and, for major outages, social media.

### **Industry Code C536: Emergency Call Service Requirements**

- Section 4.6 of the Code requires a carrier or CSP, after becoming aware of a Significant Network Outage in its network, must provide the ACMA via email, on or before the next Business Day with a copy of the notifications which the carrier or CSP sent to the ECP for 000/112 and ECP for 106 under section 27(2)(a) of the ECS Determination.

### **Background**

#### **Should camp-on and network wilting have worked during this incident?**

- A mobile phone will 'camp-on' to another mobile network when it is outside the mobile coverage provided by the home mobile network, including in some circumstances where its home mobile network is experiencing an outage.
- A mobile phone will attempt make a call using its own mobile network if the radio access network of that mobile network is available (if the mobile bases station/antenna are radiating a signal).
- New rules for wilting of mobile networks will commence on 1 November 2025 (when the [Telecommunications \(Emergency Call Service\) Amendment Determination 2025 No.1](#) commences).
- The new rules to commence on 1 November 2025 require a mobile carrier to 'wilt' the network if the core network is experiencing a 'core network outage'.
- We need to establish the facts of this issue to determine whether, had the new rules been in place (which they are not), whether this outage was a core network outage. On the information currently available, it may not, as all voice and data services other than Triple Zero appear to have been operating. In these circumstances, wilting the network would shutdown the network to all users in the relevant states/territories, so that could itself have a detrimental impact to customers and the public. It is also important to note that Optus were apparently unaware of the failure in connecting triple zero calls.

## **Welfare Checks**

- Welfare checks are required to be undertaken under section 27 of the ECS Determination.
- A CSP must undertake a welfare check as soon as practicable after becoming aware of a Significant Network Outage, or being notified of a Significant Network Outage.
- A welfare check for mobile customers may be undertaken using an SMS that requests the customer confirms via return text if they require assistance.
- A welfare check for a fixed-line service requires a phone call to the number.