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20 March 2026

Dear Sir/Madam,

The Australian Mobile Telecommunications Association (AMTA) welcomes the opportunity to provide this submission in response to the ACMA Compliance and Enforcement Priorities 2026-27.

If you have any queries or comments in relation to the content of our submission, please contact Chris Coughlan, Head of Spectrum and Network Infrastructure on 0401 988 322 or by email chris.coughlan@amta.org.au.

About AMTA

The AMTA is the peak industry body of Australia's mobile telecommunications industry. Our purpose is to be the trusted voice of industry, promoting the adoption, monetisation and sustainability of mobile telecommunications technology for the benefit of all Australians.

AMTA members include the mobile network service providers, handset manufacturers, network equipment suppliers, retail outlets and other suppliers to the industry.

EME Checker

AMTA welcomes the ACMA's continued support of the online EME Checker. The public values the Regulator's unbiased approach to checking the levels of electromagnetic energy (EME) being emitted from mobile base stations. AMTA suggest that the ACMA continue their program of EME measurements across a range of different network facilities in the community.

The mobile industry continues to value the ACMA involvement in auditing and reporting on the EME levels emitted at sites compared to the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) RPS-S1 standard. This provides an independent assessment reassuring citizens concerned about the impact of EME from mobile base-stations that they can trust in the measures reported in the mobile industry's Radio Frequency National Site Archive (RFNSA) system.

AMTA would welcome, at year end, a public release summary of:

- The number and general location of mobile base stations that have been checked by ACMA in the year.
- An overall assessment of those mobile base-station sites compliance to ARPANSA RPS-S1 standard.
- A statement on the general EME compliance of all mobile base-stations in the EME Checker database compared to the RPS-S1 standard.
- A general statement that mobile technology deployed in Australia is magnitudes below the accepted safe limit and the public has no reason to be concerned about mobile infrastructure deployed in Australia.

Mobile telecommunications industry & action on scams

The telecommunications industry blocked more than 2.7 billion scam calls since December 2020 and almost 969 million scam SMSs since July 2020.

The mobile telecommunications industry has introduced many anti-scams measures to help protect their customers from fraudulent calls and SMS. Some of these measures include firewalls to block SMS scams and machine-learning processes that try to distinguish between humans and scam organisations.

AMTA members welcome the continued focus on scams and the other enduring priorities.

Triple Zero, Mobile devices and Regulatory Compliance

Mobile devices are still entering Australia that may not comply with applicable Australian requirements (including relevant standards and labelling obligations), which can affect emergency calling integrity, among other things. Members of the public can purchase mobile devices offshore and self-import “grey devices”, including via online marketplaces and other cross-border supply channels. It is not always clear, or readily verifiable whether, these devices are supported by a Supplier Declaration of Conformity (SDoC) and may, or may not, display a Regulatory Compliance Mark (RCM).

The Emergency Service Calling Determination 2019 (Cth) (ECS Determination) as amended in October 2024, now compels mobile service operators to cease supplying carriage services where an operator has identified mobile devices that cannot make emergency calls over all three mobile networks. There is a significant risk that these self-imported grey devices will be unable to register on a mobile network in Australia if they are not known to be compliant with the ECS Determination.

Last year we recommended that the ACMA communicate with Australian retailers that are importing, or intend to import, devices to make them aware of Australia’s regulatory compliance requirements, including : compliance with the Australian Air Interface Technical Standard AS/CA S042 (AS/CA S042); the ACMA’s Supplier Declaration of Conformity (SDoC) and; the requirement to display the Regulatory Compliance Mark (RCM). Retailers should also be made aware of the need to engage with all three mobile network operators to demonstrate regulatory compliance and provide the relevant Type Allocation Code (TAC) ranges for imported compliant devices.

Mobile carriers continue to see devices entering the market, imported by retailers and individuals that are subsequently blocked. AMTA members have observed that some devices display the RCM, but manufacturers are unable, or unwilling, to produce the SDoC that should be associated with the device.

Accordingly, the AMTA suggests that the ACMA require the SDoC and the associated Type Allocation Codes (TACs) to be sighted and recorded on a register accessible to the Mobile Network Operators (MNOs). This would enable new devices (by TAC) observed on the MNO networks to be verified against the manufacturers’ declaration that the devices meet applicable standards. We note that, because there are generally two IMEIs per device, only 500,000 devices can be produced per TAC. As a result, there would also need to be a mechanism (and requirement) to record additional TACs where new TACs are added against an existing SDoC.

While the AMTA MNO members ensure that the devices they source and supply are compliant with Australian standards and meet all regulatory requirements, the market is open and it is not feasible to test all devices imported by others. However, suppliers can be required to declare that all standards and regulatory requirements have been met.

AMTA would encourage the ACMA to communicate widely with handset vendors and international online marketplaces that they should not make handsets available for sale into Australia unless the devices are known to meet all Australian regulatory requirements.

Further AMTA would like the ACMA to communicate widely to the public warning that purchasing devices offshore could result in devices that are not usable in Australia. The public should be encouraged to purchase mobile devices through Australian retail channels that are obligated to provide fit-for-purpose devices, and where the consumer has recourse under Australian consumer law, if a device does not perform as specified.

