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27 March 2025

Subject: 3G Network Shutdown 2024 & 4G/5G Device Blocking by Telcos - Impacts to Consumers

To the Communications Minister Hon Michelle Rowland MP,

As the Senate Inquiry into the Shutdown of the 3G Mobile Network has concluded and the Committee has issued their final report. I felt it was important that I once again highlight to you and the Department serious issues with the telcos handling of the shutdown and the artificial blocking of compatible devices.

This letter is an extension of the issues I raised in September and at the Senate Hearing last year.

I intend to be quite frank and direct in this letter, however please appreciate the context to which I'm writing this, and the situation I and others now find ourselves in.

Since my first email in June of 2023 I have always wanted to engage on this issue in good faith, including with my letter from September 2024.

I hope this letter actually reaches you directly as well and is not only read by the Department.

Given my involvement on this issue to date, I would hope that you have the opportunity to read this letter in full and the issues I highlight within it are taken seriously. Both consumer issues and safety concerns.

Recent Events & Background

I will say I found it extremely disappointing that the response to my 19 September letter was only sent the day after the shutdown on 29th of October 2024. Even after I attempted to follow up on the status of that letter days prior to the shutdown.

I received a 'dot point' version of that email from the Office of my Local MP Anika Wells on the 28th, so it appears it could have been sent well prior to the shutdown.

For myself, this only further amplified an already cynical view of politics that many people, particularly among my generation have. It's not the sole issue to be cynical about, but it certainly reinforced it.

Timing responses to members of the general public who are raising genuine safety & consumer rights concerns for political reasons is not okay, though commonplace it may be.

I do wonder how this subsequent letter will be received, again I don't and have never sought to engage on this issue in bad faith. But given how my concerns and proposed solutions have been consistently ignored for well over a year, it doesn't help to reinforce a positive view. I hope you can understand that.

I will say I have been a long-time supporter of the full FTTP NBN model and I have personally benefited from the rollout of FTTP NBN in my area over 12 years ago during the Gillard Labor Government.

I also support the Policy to further expand FTTP to houses across Australia and believe the NBN should remain in public hands. Others may take an alternative view, but that is my personal opinion.

I say this to make it clear my strong position and stance when it comes to the 3G Shutdown and associated issues, is not and has never been motivated by party politics.

I'm not a member of any political party, though have donated to parties in the past. The only thing that has motivated me is policy that works in the public interest.

I also opted to send this letter directly rather than through the office of a Senator.

The Problem

As I'm sure you are aware hundreds of thousands of 4G/5G devices have been artificially blocked from all services, even devices that can make Emergency Calls on every 4G network.

Consumers have been put out-of-pocket hundreds to thousands of dollars needing to once again purchase new phones, and during a time of extreme cost of living pressures.

The carriers are also blocking compatible phones sold by their competitors and refuse to unblock devices that are shown to work for 000.

This has only further concentrated profits and market control to the telcos & major handset makers, and severely limited competition & choice in the market.

The carriers have been given complete control to block devices without providing any proof, and there are no recourses available for customers that have had '4G 000 Capable' devices blocked in error from all services.

TIO Complaints are being closed and complaints to the ACMA that aren't being properly addressed.

I'm sure there is some awareness that this is what's going on, I have read numerous letters that have been sent to you and the Department, as well as the responses.

So I have read the normal template response already and I would welcome a genuine reply to this letter.

Including that "Telstra, Optus and TPG Telecom's methodologies for identifying impacted devices were independently verified as based on sound and established industry practices."

The Direction & Determination

I understand and in principle support your goal of ensuring that phones people use can make emergency calls. That I do not disagree with and I think the Direction you issued to the ACMA if actually adhered accurately and fairly by the telcos would be *generally* reasonable (but not free from issues).

However the reality is that just isn't the case. This is why I wrote to you on 19 September to warn about the consequences.

The carriers are not adhering to the actual intent of the direction nor the actual legislation, ensuring that all phones in use can call 000 and all those that cannot are blocked.

I appreciate you said you 'expect devices affected by the 3G switch off to be reliably identified', but the harsh reality is that isn't occurring, in my view the providers are in clear breach of the Emergency Call Service Determination Amendment and the policy intent of your Direction to the ACMA.

You should expect the carriers to be reliably identifying impacted devices, but knowing the past mishandlings by the telcos it was obvious to me they would fail to do this, just as they failed to correctly inform people about the compatibility of their devices prior to shutdown.

Telco 'Checker' Tools

In late January Optus released an online IMEI/TAC (Serial Number) 'Checking Tool' for Devices, though Telstra's checker has been available since at least early November.

The Checker Tools also do not list compatible devices at all.

The telcos need to be forced to actually publish the list of blocked and unblocked devices and make it easily accessible to the public.

Despite this I have downloaded the entire block list from the online Optus tool and I've run it against Telstra's Checker. There are 246,586 TACs (Models) in Optus's checker list.

Based on the data I've been able to generate through the Telstra and Optus block checkers it's very clear that devices with higher numbers of historical emergency calls have been allowed whereas others have not, despite otherwise working exactly the same.

This also includes a number of officially supported Telstra specific models (blocked by Optus & Vodafone) that can always call 000 regardless of the sim and network.

Within the lists are absolutely identical devices, both chipset, software and brand, one is blocked from Optus (but not Telstra), whereas the other device is allowed on both networks.

The list of blocked devices is quite frankly nonsensical, especially for Optus.

There is simply no other way to describe it.

This is absolutely obvious the moment you look at the lists. Even new 5G models have been blocked from some or all the networks, even though they work perfectly for 000 on 4G.

Brand	Model Name	Year	Model No.	TAC	B28	Telstra Nov 2024	Telstra Feb 2025	Optus Feb 2025
Sony	Xperia 10 VI (TW, SEA) 5G	2024	XQ-ES72	35144017	Yes	Blocked	Not Blocked	Device is blocked
Sony	Xperia 10 VI (UK, EU) 5G	2024	XQ-ES54	35819272	Yes	Blocked	Not Blocked	Device is blocked
Sony	Xperia 1 VI (TW, SEA) 5G	2024	XQ-EC72	35572338	Yes	Not Blocked	Not Blocked	Device is NOT Blocked
Sony	Xperia 1 VI (UK, EU) 5G	2024	XQ-EC54	35965166	Yes	Blocked	Not Blocked	Device is blocked
Sony	Xperia 1 VI (JP) 5G	2024	XQ-EC44	35000433	Yes	Not Blocked	Not Blocked	Device is blocked
Sony	Xperia 1 V (TW, SEA) 5G	2023	XQ-DQ72	35669414	Yes	Blocked	Not Blocked	Device is NOT Blocked
Sony	Xperia 1 V (US) 5G	2023	XQ-DQ62	35851358	Yes	Blocked	Not Blocked	Device is blocked
Sony	Xperia 1 V (UK, EU) 5G	2023	XQ-DQ54	35004648	Yes	Blocked	Not Blocked	Device is blocked
Sony	Xperia 1 IV (JP) 5G	2022	XQ-CT44	35093524	Yes	Blocked	Not Blocked	Device is blocked
Sony	Xperia 1 IV (UK, EU) 5G	2022	XQ-CT54	35666018	Yes	Blocked	Not Blocked	Device is blocked
Sony	Xperia 1 IV (US) 5G	2022	XQ-CT62	35119411	Yes	Blocked	Not Blocked	Device is blocked
Sony	Xperia 1 IV (TW, SEA) 5G	2022	XQ-CT72	35951038	Yes	Blocked	Not Blocked	Device is NOT Blocked
Sony	Xperia 1 III (JP) 5G	2021	XQ-BC42	35671845	Yes	Blocked	Not Blocked	Device is blocked
Sony	Xperia 1 III (UK) 5G	2021	XQ-BC52	35084938	Yes	Blocked	Blocked	Device is blocked
Sony	Xperia 1 III (US) 5G	2021	XQ-BC62	35242794	Yes	Blocked	Blocked	Device is blocked
Sony	Xperia 1 III (TW, SEA) 5G	2021	XQ-BC72	35292034	Yes	Blocked	Not Blocked	Device is blocked

https://docs.google.com/spreadsheets/d/1FaJYdW0I9ZydAn8gS_fo-ix73XCPJBldOoJP0Lvwqpo/edit?gid=274846585

Brand	Model Name	Year	Model No.	TAC	Telstra Feb 2025	Optus Feb 2025
Xiaomi	Redmi Note 13 Pro 4G	2024	23117RA68G	86032107	Not Blocked	Device is Blocked
Xiaomi	Redmi Note 13 Pro 4G	2024	23117RA68G	86068807	Not Blocked	Device is Blocked
Xiaomi	Redmi Note 13 Pro 4G	2024	23117RA68G	86083407	Not Blocked	Device is Blocked
Xiaomi	Redmi Note 13 Pro 4G	2024	23117RA68G	86257406	Not Blocked	Device is NOT Blocked
Xiaomi	Redmi Note 13 Pro 4G	2024	23117RA68G	86327607	Not Blocked	Device is NOT Blocked
Xiaomi	Redmi Note 13 Pro 4G	2024	23117RA68G	86335706	Not Blocked	Device is NOT Blocked
Xiaomi	Redmi Note 13 Pro 4G	2024	23117RA68G	86339107	Not Blocked	Device is Blocked
Xiaomi	Redmi Note 13 Pro 4G	2024	23117RA68G	86417107	Not Blocked	Device is Blocked
Xiaomi	Redmi Note 13 Pro 4G	2024	23117RA68G	86560707	Not Blocked	Device is Blocked
Xiaomi	Redmi Note 13 Pro 4G	2024	23117RA68G	86656707	Not Blocked	Device is Blocked
Xiaomi	Redmi Note 13 Pro 4G	2024	23117RA68G	86723707	Not Blocked	Device is Blocked
Xiaomi	Redmi Note 13 Pro (5G)	2023	2312CRAD3C	86020907	B28 Limited	Device is Blocked
Xiaomi	Redmi Note 13 Pro (5G)	2023	2312CRAD3C	86465406	B28 Limited	Reduced Coverage
Xiaomi	Redmi Note 13 Pro (5G)	2023	2312CRAD3C	86863406	B28 Limited	Device is Blocked
Xiaomi	Redmi Note 13 Pro (5G)	2023	2312DRA50C	86086206	B28 Limited	Reduced Coverage
Xiaomi	Redmi Note 13 Pro (5G)	2023	2312DRA50C	86269307	B28 Limited	Reduced Coverage
Xiaomi	Redmi Note 13 Pro (5G)	2023	2312DRA50C	86431107	B28 Limited	Device is Blocked
Xiaomi	Redmi Note 13 Pro (5G)	2023	2312DRA50C	86556307	B28 Limited	Device is Blocked
Xiaomi	Redmi Note 13 Pro (5G)	2023	2312DRA50C	86705506	B28 Limited	Reduced Coverage
Xiaomi	Redmi Note 13 Pro (5G)	2023	2312DRA50C	86754107	B28 Limited	Reduced Coverage
Xiaomi	Redmi Note 13 Pro (5G)	2023	2312DRA50C	86857907	Not Blocked	Device is Blocked

https://docs.google.com/spreadsheets/d/1FaJYdW0I9ZydAn8gS_fo-ix73XCPJBldOoJP0Lvwqpo/edit?gid=274846585

I don't even have all the data (because the telcos haven't actually published a list) and even with the limited data I have it's very clear.

Though I appreciate it may not be obvious to those unfamiliar with phone models.

Optus are even blocking 4G Vehicle Asset Trackers and numerous Kids Smartwatches, and Telstra are blocking an assortment of 4G Samsung Tablets, both classes of devices exempt under the determination.



Device is blocked

Unfortunately, based on the number your entered, the [REDACTED] UNIVERSAL TRACKER 4G device is blocked from accessing the Optus mobile network to comply with Australian legislation around mobile safety requirements. This means it won't work for calls (including Triple Zero '000'), texts or data. Your service number (phone or service number) will remain active. However, to use your service and stay connected, you'll need to insert your SIM card into a compatible 4G/5G device. Advice current as of 20/02/2025 and is subject to change.

Optus Blocked Device Checker Result – 4G Tracker

If the telcos can't even accurately block the category of devices, then how can we even remotely trust they are being accurate with the devices they deny service to?

I suspect that may be a contributing factor for why the telcos have not published any formal lists (such as in a spreadsheet). If they did it would be very clear to the public they have absolutely no idea what really works, especially for phones they or their partners didn't sell, and that's not an exaggeration.

I'm more than happy to list these blocked 'non-phone' devices in exchange for some compatible phones being unblocked. But I'm sure the telcos will just quietly unblock them anyway once this is raised.

They didn't take very long to find, so why they are blocked in the first place is beyond comprehension.

Accuracy of Blocking Devices

In a story in the ABC from November regarding this issue, it stated the following.

"Telstra also said it had checked billions of call records, industry records and user device behaviour data to determine which phones were no longer network-compatible."

"An Optus spokesperson told the ABC it had analysed tens of millions of call records to determine which devices used by its customers were no longer able to call triple-0."

ABC - Australia's 3G network has shut down, so why are 4G and 5G users being cut off? – 2024-11-04
<https://www.abc.net.au/news/2024-11-04/australian-4g-5g-users-cut-off-after-3g-network-shutdown/104559096>

It's quite clear that Optus in particular has very poor data for what devices actually work or not.

The fact they themselves say they only analysed 'tens of millions of call records', compared to Telstra's Billions, clearly highlights the lack of proper analysis by Optus prior to switch off.

Historical call analysis of entire device models (TACs) is also a flawed way to determine capability as for many devices, especially for less popular models, users of those devices could go months, if not years without ever having to make an emergency call.

TPG Telecom did advise in their questions on notice from the inquiry that the average number of emergency calls over 3G per day on their network was in the order of 700, they have millions of customers.

Telstra's blocklist is somewhat 'better' than Optus's, though highly flawed, and there are devices on their list that are NOT blocked but don't support VoLTE at all, let alone Emergency Calls.

I could list these devices but that would be an entirely pointless exercise as removing them does nothing to address the systemic issue at play here and the associated safety issues.

3G First for 000 vs 3G Only for 000

Telstra is also blocking a large number of recently released new 5G devices that work perfectly for Emergency Calling on every network, including Telstra. (As is Optus)

Such as phones made by Asus, Fairphone, OnePlus, Sony, Xiaomi and Nubia/ZTE, amongst others.

I suspect this is because many of those devices use a Generic/Global 'Open Market Device' VoLTE Modem Configuration, and as the Telstra network did not work with many 'Open Market Devices' for standard calls those phones were using 3G Circuit Switch Fallback for all Calling.

Current Modem Config: Slot 0: default_global_vl	Current Modem Config: Slot 0: Volte_OpenMkt-Commercial-CMCC
Current Modem Config: /system/etc/customization/modem/amss_fsg_poplar_ir51_ir92_ims_tar.mbn	

Global/Open Market (IR.92) VoLTE Modem Configs

Or in some cases VoLTE was just off by default, as was the case with many Xiaomi models.

If someone was in an Emergency, a device will typically pick the same 3G connection to place that 000 call. Whereas without 3G, the device would perfectly place the call over 4G. Whether VoLTE is on or off.

So Telstra assumed those devices must be 3G only for all calls, when clearly that wasn't the case.

At the Senate Inquiry hearing on 24 July, the TPG Telecom (Vodafone) representative Mr Ross Mitchell did state the following in response to the question "In the last 12 months, how many calls to triple 0 were placed over the 3G network, and how many daily?"

Mr Mitchell:

"Again, we'll take that on notice. But I think it's important to put out the context for why a call can end up on a 3G bearer into triple 0. There are a range of networks that are available to a handset at the moment, and essentially in an emergency situation it will pick up the strongest of signals and try to make a successful call on that bearer. So, whilst we'll give you some numbers on how many calls have gone into triple 0 on 3G, it will overstate the size of the problem quite significantly, because, if for whatever reason the customer is in a strong 3G area, the phone, without a 3G network, would have quite happily made a 4G emergency call. So I'm trying to give you some context for why the answer you're going to get back may look a particular way, not giving you a true sense of the problem."

Senator ROBERTS:

"So it chose 3G because the 3G signal was stronger?"

Mr Mitchell:

"That's right. There are also things like orders of networks in phones, so it may well be that it's ordered to try and pick up a 3G signal and make that call on that emergency system first. So there are a whole range of reasons for why calls may well come into an emergency system via the 3G network, beyond the issue that you're highlighting."

*Rural and Regional Affairs and Transport References Committee - 24/07/2024 - Shutdown of the 3G mobile network
https://www.aph.gov.au/Parliamentary_Business/Hansard/Hansard_Display?bid=committees/commsen/28168/&sid=0000*

That response by Mr Mitchell is correct and it can overstate the issue, though equally that approach masks issues with devices that technically should work (based on the make and model) but due to software or settings issues on the device cannot place an Emergency Call.

However to me it seems that Telstra, and Optus especially, did not thoroughly consider this aspect, both telcos are overblocking a large number of perfectly compatible makes and models that work natively out of the box for 4G Emergency Calls, but may pick 3G first when it's available.

Conveniently these are largely devices they didn't sell or were sold by other telcos.

Transparency for Blocked Devices

As mentioned the 'Checker Tools' for Telstra and Optus do not list compatible devices at all. They just offer a device serial number (TAC) search box.

The online tools from Telstra and Optus are useless for finding supported devices, as users first need to obtain the exact 8 digit TAC 'Type Allocation Code' (Model Serial) for a device.

There are hundreds of thousands of possible TACs in existence, and devices are not listed for sale with their TAC or IMEI. You're welcome to try it yourself and see what I mean, links below.

Optus Checker

<https://www.optus.com.au/support/checkdevice>

Telstra Checker

<https://www.telstrawholesale.com.au/3G-Network-Closure-Blocked-Devices-Checker.html>

There is no way to select a given make or model of phone from a drop down list and get a result. The only comprehensive public list that exists is the one I made for consumers.

So far I have compiled and queried tens of thousands of different device TAC Codes (Models) and put them into a publicly accessible Google Sheet.

Blocked Devices Google Sheet

https://docs.google.com/spreadsheets/d/1FaJYdW0l9ZydAn8gS_fo-ix73XCPJBldOoJP0Lvwqpo

It shouldn't have to take members of the public to do that.

This approach of obfuscating what devices are blocked, not blocked and why, does nothing for competition and consumers at large.

The fact that Optus deleted their VoLTE Support page around the 29th of November makes matters worse. Telstra has a supported devices page, though not a very detailed one.

The telcos need to be forced to actually publish the list of blocked and unblocked devices and make it easily accessible to the public. The lists also need to state with clear detail why a device is blocked or not, and the exact criteria that resulted in that device being classified that way.

The telcos get to hide behind saying "that device is incompatible with our network" without having to provide any specific detail or proof to explain why.

Internally they have that information and they know full well they are blocking compatible devices, though they will deny that.

They have the exact reasons why devices are blocked, including observed call volumes.

The classification of devices appears arbitrary, devices not sold by the telcos or their handset partners are being disproportionality blocked, even when they work for 000.

When customers show they've made historical 4G 000 calls in an Emergency, the customer support then comes up with some other excuse why the device is 'incompatible'.

I along with many other telco customers have been repeatedly given false and misleading information by the telcos and customer support.

I'm sure those with coverage issues post shutdown have had a similar experience.

Vodafone in particular seems to be training their support agents to tell customers 'it's the Governments list' and not Vodafone's.

Though some telco support agents will admit the lists aren't very accurate but there's nothing they can do.

This is why the lists of blocked devices and why they are on them needs to be made fully public.

Optus (and Optus MVNOs) are telling customers that the manufacturer of their device 'hasn't provided the requisite compliance documents' to allow the device on the network.

Vendor testing documentation is not a requirement under the ECSD, Optus has gone well outside the scope of the ECS Determination, and in my view, using it to justify blocking compatible devices sold by competitors and otherwise 'Whitelisting' devices.

Telstra has not approached compliance in this manner and seems to accept standard compliance testing, they have also unblocked models recently where Optus has not.

The AS/CA S042 requirement for domestically sold devices was only introduced a few years ago, but Optus especially seems to be using it to block devices made prior to that standard.

That also ignores that there are a large number of devices currently allowed on the networks that have never undergone that process that work perfectly.

There are many devices allowed based on Emergency Call volumes alone.

Optus can't have it both ways.

For example Optus is blocking my Telstra sold (network unlocked) Sony Xperia XZ Premium, which is officially supported by Telstra for Emergency Calling on every network.

Only the version of the phone sold by Optus (or retail) is allowed to connect to the Optus network, despite both models being completely identical, including at a software level for 000, and regardless whether an Optus or Telstra sim is inserted. The only difference is the IMEI TAC (Serial Number).

Telstra Versions of the XZ Premium (G8141) have a TAC of 35923708.

Whereas AU Retail and Optus versions of the XZ Premium (G8141) have a TAC of 35783808.

With Vodafone, I note there is presently no publicly accessible IMEI/TAC Checker tool (despite such a tool being available internally for support staff).

So I'm unable to carry out a bulk 'Blocked & Supported Devices' comparison with Telstra and Optus.

Vodafone's Checker Tool (along with an actual list) needs to be made public as well.

It's quite telling that Vodafone still has no public tool, more than 12 months after they shutdown, and customer support, like a genie, limits you to 3 IMEI/TAC Requests per support call.

Though based on the results from a survey I conducted and discussions online, it's quite clear that Vodafone appears to be blocking the least number of VoLTE capable devices compared to Optus and Telstra.

In addition to the previous comments made by Mr Mitchell, the lower rate of blocking would also be owing to Vodafone having no 3G network for several months in advance of the full 3G switch-off.

Therefore Vodafone has much better 'real world' data for what works and what doesn't. However Vodafone has still blocked a very large number of perfectly compatible devices.

Though there also are devices currently allowed to connect to the Vodafone network that are unable to make Emergency Calls over 4G.

For another inaccurate blocking example, I have a 5G Capable device running Android 12 software (2021/2022) that supports VoLTE Calling, VoLTE Roaming Calling and VoLTE Emergency Calling.

The device uses a Generic/Global GSMA 'Open Market' VoLTE profile regardless of what sim card is inserted. That profile supports VoLTE Emergency Calling on every network in Australia and Globally.

It isn't blocked on Vodafone and is 'officially supported', however that device is being blocked by both Telstra and Optus, despite it otherwise being perfectly capable of calling 000 on 4G with both networks.

That device also has done so multiple times, including prior to the switch-off and with the sim cards from each provider inserted and via camp-on.

The device is even blocked when using an international roaming sim card. So tourists looking to use that device (and other devices) are being blocked from all services, even when using roaming.

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Thanks for using our 3G device checker. Our records as at 05 Mar 2025 indicate the device in use for your service was XPERIA 1 II.

Good news. Your mobile phone is compatible with our 4G/5G network. Please remember to keep your device software updated.

Now • Vodafone AU

Xperia 1 II XQ-AT52 Screenshots

Brand	Model Name	Year	Model No.	TAC	B28	Vodafone Feb 2025	Telstra Feb 2025	Optus Feb 2025
Sony	Xperia 1 II (US, EU) 5G	2020	XQ-AT51	35254911	Yes	Not Blocked	Blocked	Device is blocked
Sony	Xperia 1 II (TW, SEA) 5G	2020	XQ-AT52	35353811	Yes	Not Blocked	Blocked	Device is blocked
Sony	Xperia 1 III (UK, EU) 5G	2021	XQ-BC52	35084938	Yes	Not Blocked	Blocked	Device is blocked
Sony	Xperia 1 III (TW, SEA) 5G	2021	XQ-BC72	35292034	Yes	Not Blocked	Not Blocked (as of 02/25)	Device is blocked
Sony	Xperia 5 III (TW, SEA) 5G	2021	XQ-BQ72	35493043	Yes	Not Blocked	Blocked	Device is blocked

Telstra VoLTE Changes & Open Market Devices

In my September letter and in my ECS Consultation Submission to the ACMA I said that ‘Telstra needs to be forced to support as many devices as possible, by supporting the most widely used ‘Open Market’ VoLTE profiles & standards’.

I also spoke to this at the Senate Hearing on the 23rd of July 2024 and to the ACCC in late August.

I also wrote about VoLTE compatibility & standardisation issues in my June 2023 letter and in my November 2023 Optus Inquiry Submission.

In your October letter my concerns were somewhat acknowledged, but up until the shutdown nothing was done about this.

Telstra was then allowed to block VoLTE capable 4G & 5G devices they didn’t sell that work perfectly (including for 000) simply because they used generic VoLTE profiles and by extension didn’t have standard VoLTE Call service on Telstra.

This includes devices sold by Asus, Fairphone, OnePlus, Sony, Xiaomi and Nubia/ZTE, and more.

These devices were always perfectly capable of 000 Calls as it's a separate 'SOS' bearer (connection).

However it appears that sometime in late January or early February this year Telstra made changes to their network to allow Generic 'Open Market' VoLTE Profiles to register and obtain (IMS) Call Service.

A Telstra specific Modem profile/config or the latest GSMA profile is now no longer required.

Telstra Vo 4G

Current modem

ir92_ims_gte_tar.mbn

IMS Status

IMS Registration: Registered

Voice over LTE: Available

Voice over Wi-Fi: Unavailable

Video Calling: Unavailable

UT Interface: Available

VoLTE Calling on Telstra – 'Open Market' IR.92 Config - Android

Even generic VoLTE profiles on Android 7 (2016) devices can now register and obtain call service. *Previously they would only work on Optus and Vodafone, as shown below.*

MBN Modem Configurations Qualcomm SD 820 Chipset (2016)	Network Name	Country	Sim-less 4G Emergency Calls (112/000)	Optus VoLTE	Vodafone VoLTE	Telstra VoLTE
bell_ims_tar.mbn	Bell CA	Canada	Yes	No	No *	No
china_mobile_hk_ims_tar.mbn	China Mobile HK	China/HK	No	No	No *	No
ee_ims_tar.mbn	EE	UK	Yes	No	No *	No
hutch_uk_volte_vowifi_tar.mbn	3 (Three) UK	UK	Yes	Yes	Yes *	No
ir51_ir92_ims_gte_tar.mbn	VoLTE + WiFi Call	GSMA Open Mkt	Yes	Yes	Yes	No
ir92_ims_gte_tar.mbn	GSMA IR.92 VoLTE	GSMA Open Mkt	Yes	Yes	Yes *	No
optus_ims_tar.mbn	Optus	Australia	No	Yes	No	No
orange_france_ims_tar.mbn	Orange FR	France	Yes	Yes	Yes	No
reliance_jio_ims_tar.mbn	Jio Mobile	India	Yes	No	No *	No
rogers_ims_tar.mbn	Rogers CA	Canada	Yes	No	No *	No
sfr_france_ims_tar.mbn	SFR FR	France	No	Yes *	Yes	No
singtel_ims_tar.mbn	Singtel SG	Singapore	No	No	No *	No
tele2_netherlands_ims_tar.mbn	Tele2 NL	Netherlands	No	Yes *	Yes	No
telefonica_germany_ims_tar.mbn	O2 DE	Germany	No	No	No *	No
telefonica_uk_ims_tar.mbn	O2 UK	UK	No	Yes	Yes	No
telekom_germany_ims_tar.mbn	Telekom DE	Germany	Yes	Yes	Yes *	No
telstra_ims_tar.mbn	Telstra	Australia	Yes	No	No *	Yes
vha_ims_tar.mbn	Vodafone AU	Australia	No	Yes	Yes	No
vodafone_germany_ims_tar.mbn	Vodafone DE	Germany	No	Yes	Yes *	No
vodafone_uk_ims_tar.mbn	Vodafone UK	UK	No	Yes	Yes	No

* = Estimated Result based on other network testing

Test Device: Sony Xperia XP F8131 - 2018 Android 8.0 Firmware

Tested Q2 2024 – Xperia XZ & X Performance is officially supported by Telstra

I only discovered this after carrying out some device testing in early February (which was difficult to do as Telstra has blocked the majority of Android devices I own, even though they can all call 000 on 4G.)

This change could and should have been done months ago well prior to the shutdown, it was even mentioned in the interim Senate Inquiry report.

I should also point out that the Telstra network still seems to only allow IPv6 (Internet Protocol Version 6) for Emergency Call attaches, whereas Vodafone and Optus Support IPv4 and IPv6, which is the more correct 'standard compliant' approach (as shown at the EENA Presentation in 2022).

Known issues for VoLTE and emergency calling on 4G/5G only networks

- Some handsets only support fallback to 2G/3G circuit switched for emergency
- IPv4/IPv6 implementations cause errors for emergency calling
 - Some handsets only use IPv4 for emergency calling (some operators only IPv6)
 - Some handsets only use IPv6 (operator may require IPv4 and IPv6!)
 - Some handsets want both IPv4 and IPv6 (standard compliant), but operator only IPv6
- Blacklisting may affect ability to dial emergency number
 - Use of VoLTE/emergency on other networks/SIMs may be blacklisted by home operator
 - Handset may be blacklisted for VoLTE/emergency by home operator
 - Handset may be blacklisted for VoLTE/emergency by visited network
 - Handset manufacturer may blacklist home operator or visited network
 - Chipset manufacturer may blacklist home operator or visited network
- Home network may not support VoLTE or VoLTE roaming
- Assortment of other firmware/software/manufacturer/chipset/IMS-platform issues

It's impossible to know if a VoLTE phone can dial emergency services, double so when roaming

Stratix

20

'Should we stop the shutdown of 2G/3G to save lives??' Slide 20 - Rudolf van der Berg - Stratix - EENA 2022
<https://drive.google.com/file/d/1WC16k8C1gpeFRJif23yDluLSRg1OJOnZ/view>

GUTI 505 01 C545			
Session #1			
Context	QCI	BearerID	State
Default	5	5	Active Pending
APN	AMBR DL/UL		
sos	102 Kbps / 102 Kbps		
PDN IP	::446e:66ae:e58e:b3cd		

NSG - MCC 505 MNC 01 – Telstra - IPv6 Only

GUTI 505 02 8000			
Session #1			
Context	QCI	BearerID	State
Default	5	5	Active Pending
APN	AMBR DL/UL		
sos	289 Kbps / 289 Kbps		
PDN IP	::7213:b31:7494:d69f/10.197.67.69		

NSG - MCC 505 MNC 02 – Optus - IPv6 & IPv4

So they still have some work to do, though I'm sure Telstra will say they've never had a standards issue, despite this exact problem also being raised by the GSMA as an issue in April 2022.

Then further raised at the 2022 EENA Conference in the Presentation by Mr van der Berg.

The standard for VoLTE emergency calling has mistakes. Industry discusses but doesn't take action



GSMA PRD IR.92 states that "The UE and the network must support both IPv4 and IPv6 for all protocols that are used: SIP, SDP, RTP, RTCP and XCAP/HTTP". There are discussions within the GSMA Networks Group about whether this should be changed to say "The UE **must** and the network **can** support both IPv4 and IPv6 for all protocols that are used: SIP, SDP, RTP, RTCP and XCAP/HTTP". The key thing is that the UE should support both versions. The problem scenario raised has been reported to the GSMA previously. So, UE supports only IPv4 and the network only supports IPv6 for emergency and thus PS emergency call is not possible - which is an issue.

GSMA Services Showcase Live #2 Getting VoLTE Rollout Right Wednesday 6 April 2022

Stratix

10

'Should we stop the shutdown of 2G/3G to save lives??' Slide 10 - Rudolf van der Berg - Stratix - EENA 2022
<https://drive.google.com/file/d/1WC16k8C1gpeFRJif23yDluLSRg1OJOnZ/view>

It is however important to note that most devices (2016+) generally support either and both IP Versions, so it doesn't pose a problem for calling interoperability, though there are older (IPv4 Only) devices (which are largely now blocked) that cannot make Emergency Calls on Telstra due to the IPv6 requirement.

Though this issue may still extend to some devices being used by tourists that aren't blocked, or are 'supported' but are running software from other carriers.

So should Optus or Vodafone be unavailable they won't be able to make an Emergency Call due to IP Version differences.

This should be fixed and soon, and it's quite telling it hasn't been fixed already up until this point.

I even talked about this sort of compatibility issue at the hearing on 23 July in relation to some devices from overseas that will just get stuck on calling when making 4G Emergency Calls.

It's also mentioned in my Supplementary Inquiry Submission #32.1 from August.

Clearly these issues should have been resolved first before the networks were shutdown, but instead we proceeded with a 'cart before the horse' policy, only fixing issues later. A clearly nonsensical approach.

Regardless, even this issue is not a good enough reason to entirely block devices as it's clearly a failure by the network providers (or in this case Telstra), not the handsets.

Yet the telcos have also blocked IPv6 Capable devices that work perfectly for Emergency Calling and have placed successful emergency calls over 4G on the network.

Emergency Call Failures & Testing

With the networks now off it's abundantly clear what devices rely on 2G/3G for Emergency Calls, as they now just get stuck on Calling and the call never connects. (Circuit Switched only Emergency Calls)



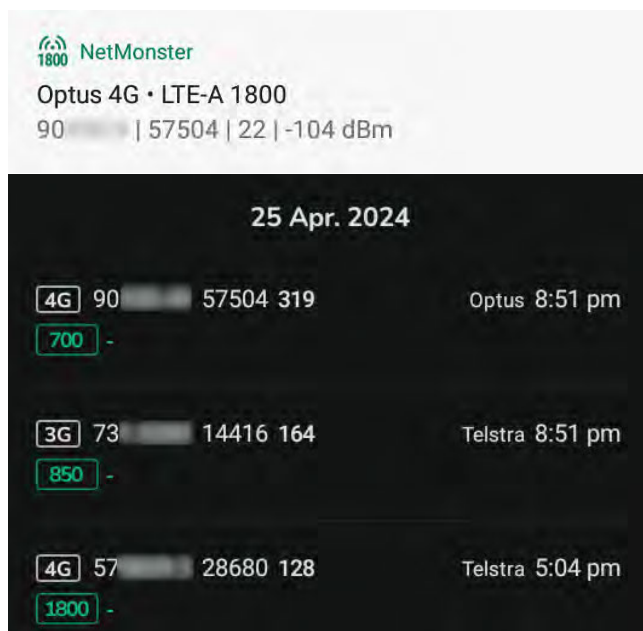
It's also worth mentioning testing Android devices prior to shutdown was entirely possible, despite claims otherwise. These devices could be tested for 4G Emergency Calling by forcing the device to be 'LTE Only' in settings and monitoring the network band when placing an Emergency Call to 000 or 112.

Devices that relied on 3G for 000 would fall back to a 3G Band (850 or 900Mhz). Devices that supported VoLTE Emergency Calling would instantly place the Emergency Call over 4G on an LTE Band.

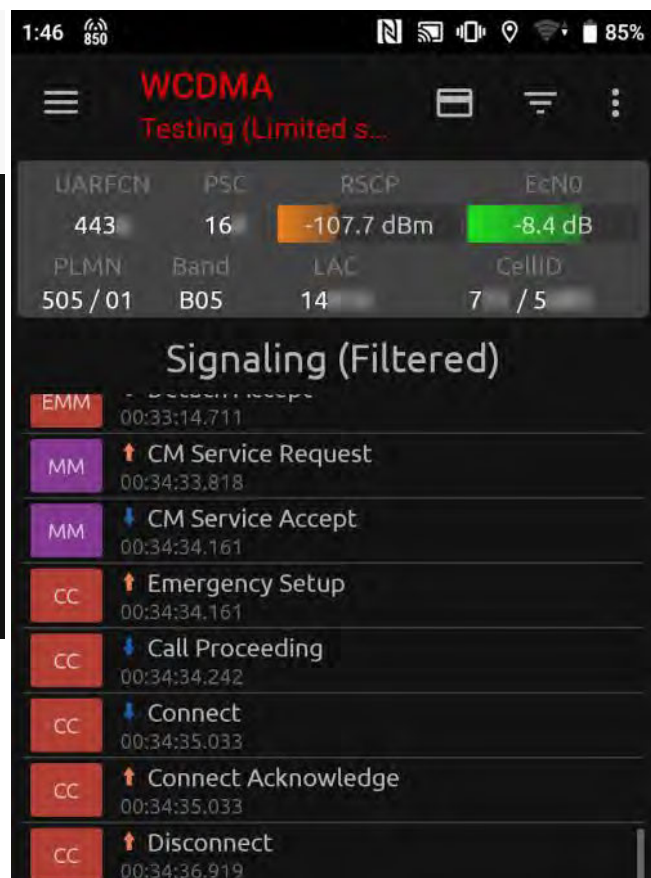
DL Bandwidth (kbps): 0
UL Bandwidth (kbps): 0
LTE Physical Channel Configuration: {}
Set preferred network type:
LTE/UMTS auto (PRL)

DL Bandwidth (kbps): 0
UL Bandwidth (kbps): 0
LTE Physical Channel Configuration: {}
Set preferred network type:
LTE only

Android Phone Info Debug – Set Preferred Network Type – LTE/UMTS (3G) to LTE only

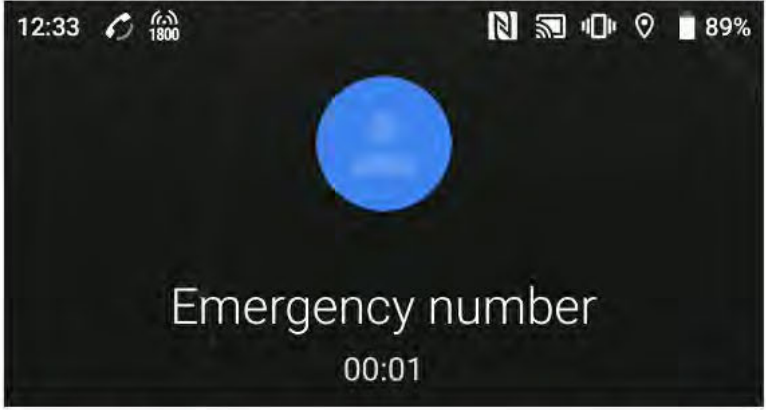

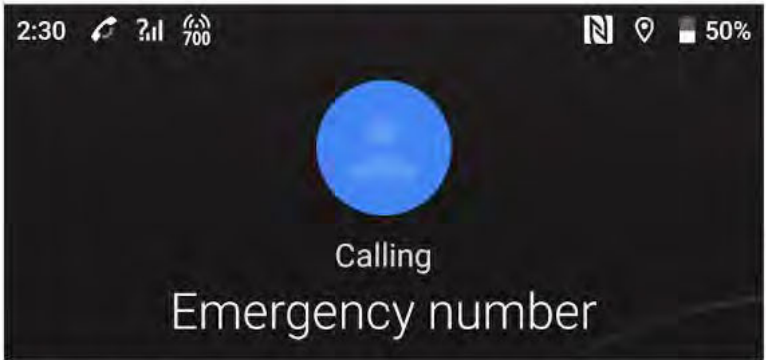

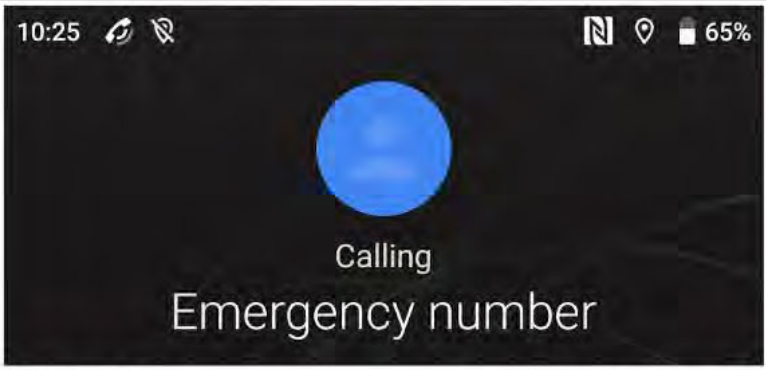





NetMonster App - Band Logging (non-root)



Network Signal Guru App - Band & Signal Monitoring (root)

4G Emergency Calling & 3G Emergency Calling Icons

	
	<p>✓ 4G Band Icons (Success)*</p>  <p>* 850Mhz 4G</p>
	
	<p>✗ Fallback to 3G (Fail)*</p>  <p>* 850Mhz 3G</p>

* Icons will depend on the local networks available, device firmware and settings

Last year I wrote some general device testing instructions for consumers, including for Emergency Calling and I provided a link to these instructions to the ACMA in my ECSD Consultation Submission.

How to Check for Working 4G VoLTE Calling on Android Handsets

<https://medium.com/@jamesdwho/how-to-check-for-working-volte-calling-on-android-8c343362ecfe>

The Little Known Problems with VoLTE Emergency Calling - How to Test for 4G Emergency Calling Support on Android

<https://medium.com/@jamesdwho/the-little-known-problems-with-volte-emergency-calling-3d4cdaf0e042>

But the ACMA denied that testing was possible prior to shutdown in their explanatory paper.

Concern that consumers being told devices are 'affected' that are not.	<p>A number of submissions from individuals who say they are confident that certain groups of devices will work post shutdown, but the checkers indicate they will not.</p> <p>No way to determine how credible those assertions are noting there is no</p> <ol style="list-style-type: none">1. No way a consumer can test it at the moment as there are 3G networks still in operation.2. It is possible some consumers have individually retrofitted or configured their phones such that they might work post-shutdown, albeit the device would not have 'factory settings' configuration.	Carriers and CSPs will need to rely on disabling carriage services for specific models of devices, and making allowance for individual devices would not be technical possibly given the TAC blocking proposed to be undertaken by mobile carriers to block carriage services.
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Emergency Call Service Amendment Determination 2024 Explanatory statement - F2024L01353ES - Pg42
<https://www.legislation.gov.au/F2024L01353/asmade/text/explanatory-statement>

This again brings into question if the ACMA is properly resourced to understand this issue and if any of the public consultation submissions were actually read in detail and comprehensibly understood.

On the face of it, it appears not.

It also appears that people who followed those instructions helped to prevent some devices from being blocked, as the test calls generated enough network data to meet the telco's call volume and threshold requirements.

Devices with higher numbers of emergency calls have been allowed whereas others have not, despite otherwise working exactly the same. (*Calls didn't need to be longer than 2 sec to confirm compatibility*)

At a minimum I would expect that the telcos should have to be able to prove why they blocked specific models and the exact technical criteria and call volumes that resulted in a given model being blocked.

They have that information internally but refuse to provide it publicly.

There is absolutely no good reason why this information shouldn't be public. The carriers are currently engaging in what I see as clearly unlawful behaviour blocking 4G 000 compatible phones they didn't sell or were sold by their competitors. This is an absolute fact and is easily proven.

This is a systemic issue and there is very clear data and evidence to show this is a systemic issue.

Contacting telco support is a complete waste of time, the support representatives either do not know what they're talking about or come up with nonsense explanations for why a device that can call 000 on 4G is blocked from all other services.

Last year Optus even blocked brand new devices being sold at JB Hi-Fi for the Australian Market.
They were always compatible, Optus just failed to manage their support lists properly.



Xiaomi Redmi 13 Review - 2024-11-13 — JB HiFi

Xiaomi Redmi Note 13 Pro+ Review - 2024-11-21 - JB HiFi

People have raised complaints with the TIO about this, but those complaints are being closed without resolution, including my own TIO complaint regarding my officially supported Telstra sold XZ Premium.

As you would be aware the TIO is just an ombudsman scheme and cannot compel providers to unblock models, they have no power to do so, that falls with the ACMA. So to some extent that is expected, though NOT what customers deserve.

The recent spike in TIO complaints should be a clear warning sign something is wrong here.

ABC - 3G network shutdown drives surge in telco service complaints – 2025-02-20

<https://www.abc.net.au/news/2025-02-20/telecommunications-complaints-3g-shutdown-optus-telstra/104959072>

People then complain to the ACMA and then get given the run around with misinformation and half-truths to get them to go away. There are some serious questions here regarding the conduct of the ACMA.

At a certain point I've seen the ACMA say they will no longer respond to people, even when their issue hasn't been resolved and their questions left unanswered.

The question is, who benefits here? The Consumers & the public or the telcos?

Emergency Calling Standardisation and Interoperability Issues

The providers are not reliably identifying which devices can and cannot call 000 on 4G, and never have.

I will say again, **I can currently connect with devices models that are 'officially supported' that due to software and settings issues on the device cannot make emergency calls on 4G.**

I also have (non-blocked) devices that will take in excess of 1-2 minutes to actually connect with an Emergency Call depending on the service state, even if the device says 'SOS Only'.

And this includes iPhones with 2020 and newer device software in their stock configuration.

It is currently possible to connect with devices that are 'hardware compatible' but software incompatible and be unable to call 000. Neither the carrier nor the user would be aware of this.

Despite provider assurances, a device that says "SOS Only" or "Emergency Calls Only" can fail to actually place an Emergency Call or can take minutes to connect. This issue is also mentioned in my 3G Senate Inquiry Submission regarding US provider OptimERA's testing from 2020.

The theory says if a device says "SOS Only" or "Emergency Calls Only" then it *should work*, but that is just not true in reality. Particularly for existing devices.



I've seen devices say "SOS Only" that aren't even connected to a tower.

I'm happy to show and demonstrate this issue with devices to the ACMA, ACCC, Department or yourself. Again I wish to engage on this issue in good faith and in an open & constructive way, I have always wanted to.

Please understand that though this letter has a very direct and straightforward tone, it's because this is a very important issue and it warrants a serious response by Government and Regulators.

For both the consumer issues and risks to safety.

I take it from the very limited responses to those questions taken on notice from the 12 February Inquiry Hearing, that the Department is aware this may be a problem, but is reluctant to admit it, and should something go wrong the blame will be directed to the ACMA and telcos.

That response falls far short of what is needed, but I will make it clear, this is currently possible and happening. Though hopefully in relatively small numbers, but without an official way to test individual devices it's hard to know.

This must be addressed and the Bean review 'device testing facility' isn't going to fix this problem.


Only testing a sample of device models every few months is not sufficient to solve this issue.

'Lab testing' a selection of devices is an exponential 'N-squared' problem, there are too many software versions and variants of devices for the carriers to be able to comprehensively test all known device models & configurations, and that's even ignoring issues with individual devices.

There are even brand new Samsung Phones that aren't on Telstra's formal Whitelist.

Enter the first eight digits of your IMEI below. *

[Check my device](#)

 **Device is NOT Blocked**

Great news, based on the number you entered, the SAMSUNG GALAXY S25 device has not been identified as having compatibility issues and is not blocked from accessing the Optus mobile network. Advice is current as of 20/02/2025 and is subject to change. If you are having connection issues, it might be for other reasons. Contact your service provider or your device manufacturer for technical assistance.

Optus Blocked Device Checker Result - Samsung Galaxy S25 - 35348558

Device not found.

Based on the number you provided 35348558, we can't verify whether this phone will be compatible with Telstra's mobile network.

Check your device manual or contact the manufacturer for more information.

Telstra Blocked Device Checker Result - Samsung Galaxy S25 - 35348558

The answer here is not to blanket ban devices out of concern, though that may be the first impulse, and it certainly isn't to let the carriers be the sole arbiters of what's allowed and what isn't.

What does scale is user enabled testing, you can very quickly and very easily get a lot of valuable data from customer test calls. That combined with formal lab testing can ensure that functionality is validated and any issues resolved.

This data can also be used to unblock devices.

The simple practical way to fix this is ensure all the networks follow the same internationally recognised 3GPP & ('Open Market Device') GSMA standards and enable individual device testing, just as we do for household fire & smoke alarms and other safety equipment.

It seems Optus only wants to accept AS/CA S042.1:2022 Testing Certification to unblock devices rather than more globally recognised long standing GSMA IR.92 & ETSI (European Telecommunications Standards Institute) Compliance Testing.

The 'AS/CA S042 Standard' from the Communication Alliance simply just references existing ETSI Testing Documentation, which the industry globally already uses, so in a way it's an entirely redundant standard. We should accept and follow international global standards and not try to make our own.

Obviously Optus are doing this to minimise any exposure when it comes to 000 compatibility issues, following on from their major outage in November 2023. However that incident was due to problems with their network not wilting correctly, not directly customer devices.

The providers should be responsible for their network and customers responsible for their devices.

To not have a way for the public to test their devices is like buying a smoke alarm that has no test button, the vendor says "oh, well we tested it when it came out of the factory and it was confirmed working and compliant then, so you don't need a test button".

That is quite obviously ridiculous.

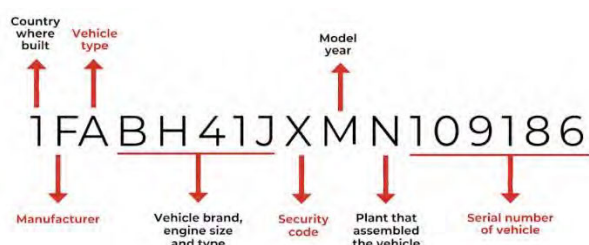
Even if they then said, "well we test a sample of that model every 6 months and the samples we've tested passed, therefore your alarm works, so there's nothing to worry about and you have no need to test", is again ridiculous.

Yet that appears to be the current policy approach?

I could use the same analogy to describe if we determined the road worthiness of cars purely based on the make and model of vehicle, rather than if a particular individual vehicle is actually roadworthy in its current condition.

Like the VIN of a vehicle, an IMEI TAC code only tells you what brand and model it is, it doesn't say anything about if it's actually working properly and safe to use.

This is why roadworthiness inspections exist.



Vehicle VIN Example



Mobile Device IMEI/TAC Example

With the VIN & Vehicle Example, to say "Oh, well it was roadworthy when it came out of the dealership, so therefore it must still be roadworthy", or "we've checked a sample of those models and they were roadworthy, so they must all be" is again completely nonsensical, yet that's what is happening here.

Making matters worse, anything not sold by the 'main dealer' or partners is deemed to be 'not roadworthy' and banned from use on the roads. But with absolutely no mechanism to dispute it.

For phones officially supported on one network but not the other it would be like buying a car in NSW that's roadworthy and going into Queensland and being banned from driving it on the roads because Queensland doesn't think it's Roadworthy (even though it is) as it wasn't sold in that state.

Along with there being absolutely no method available to prove that it is, and instead being told to buy a new one. That again would be quite obviously utterly absurd.

So how is this acceptable when it comes to mobile devices?

There are even new phones worth as much as people's cars.

Telco Awareness

The telcos are aware they are blocking devices that can call 000 on 4G. Blocked devices that are capable of Emergency Calls send their device IMEI (Serial Number) to the network when placing an anonymous (camp-on) 4G Emergency Call. These calls and the associated network activity is logged.

```
SIP Message : {INVITE urn:service:sos.police SIP/2.0
From: "Anonymous" <sip:Anonymous@Anonymous.invalid>;tag=34
To: <urn:service:sos.police>
CSeq: 23 INVITE
Call-ID: 34 @2405:dc00: : : : :
Max-Forwards: 70
Contact: <sip:user@[2405:dc00: : : : : ]:5060>;
+sip.instance="<urn:gsma:imei:35353811- -0>";+g.3gpp.icsi-ref=
```

Anonymous Emergency SOS Call – IMEI/TAC 35353811 – Sony Xperia 1 II 5G - Android 12 - Blocked on Optus & Telstra

Devices that require 3G for Emergency Calls will now just get stuck on calling, including some 'Officially Supported' Devices.

Using a device hardware make & model identifier (a TAC Code) to determine Emergency Calling capability is very flawed, yet this is the current approach used by the carriers.

Regular Calls are carried over the IMS Bearer and Emergency Calls are carried over the SOS bearer, this also ensures traffic prioritisation on the network (as it's all just data now).

The 'SOS' Emergency Call Connection on devices is really only established when an Emergency Call is placed on the device. (Either with or without a sim)

This is why the telcos have poor visibility of what works and doesn't and why they are over reliant on 'compliance documents' and historical call records for device models.

A device can successfully register for VoLTE and IMS (which the telcos can see), but Emergency Calls over the SOS bearer can fail to connect when calling 000. (For example if the device 3G only for 000)

The 000 capabilities should be determined on an individual device basis (per full IMEI) and they can be determined on an individual device basis. It just requires the carriers to put in the work.

They already have a way of gathering the data, they just need to use it.

It is not possible to accurately determine the emergency calling capabilities of a device based on the hardware make and model identifier (a TAC). Emergency Calling compatibility is a software issue, not a hardware problem and software can break, be it on the device or network.

The telcos haven't even accurately classified which device models actually have Band 28 as shown by the results on their checker tools.

Brand	Model Name	Year	Model No.	TAC	Telstra Feb 2025	Optus Feb 2025
Apple	iPhone 11	2019	A2111	35016883	Not Blocked	Reduced Coverage
Apple	iPhone 11	2019	A2111	35032052	B28 Limited	Reduced Coverage
Samsung	Galaxy S10 5G	2019	SM-G977P	35587210	Not Blocked	Reduced Coverage
Samsung	Galaxy S10+	2019	SM-G975W	35456310	B28 Limited	Device is NOT Blocked
Samsung	Galaxy S10+	2019	SM-G975U	35461210	Not Blocked	Reduced Coverage

There needs to be a system to 'address the capabilities of devices where customers bring their own', just as highlighted in the Bean Review. The carriers should not be allowed to continue to blanket block devices they can't be bothered to confirm, even when they work.

A simple solution here would be to explore what was suggested in the Working Group and establish a test RVA for 000 calls. Per FOI 24-353 (Page 57 of 75)

4. A Triple Zero "test call" facility may not be feasible

Telstra indicated that it investigated the possibility of creating a "test call" number that would allow consumers to test their devices before the shutdowns take place. Such a facility would route test calls to a recorded voice announcement (RVA) rather than the Emergency Call Person Answer Point. However, Telstra claimed that it would not be possible to guarantee that genuine Triple Zero calls would not end up at the test RVA. We intend to further discuss the feasibility of such a facility with the MNOs.

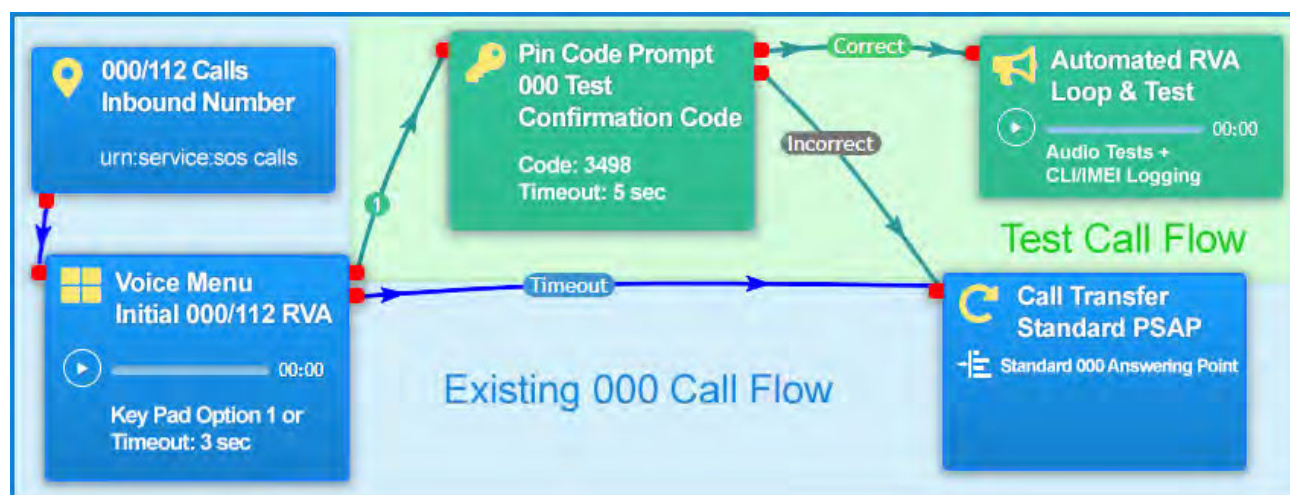
FOI 24-353 - Briefs to the Minister on the 3G network switch offs — 27 Mar 23 and 27 March 2024.

<https://www.infrastructure.gov.au/sites/default/files/documents/foi-24-353--documents-for-release--pdf.pdf>

That proposal was a good idea and would have provided very valuable data, and this should be revisited.

It would be extremely simple to automate this, and it could be designed in such a way to ensure that genuine 000 calls do not end up at the test RVA.

Refer to the example Call Flow below.



Example Call Flow for Emergency Calling & Automated Testing

It's worth mentioning that in the US members of the public can book a time to test call 911, there is no good reason why we shouldn't have that here and yes it can be entirely automated and does not require any human operators to be involved at any point.

Just as indicated with the 000 RVA in the working group.

The only complexity is 000 testing blocked devices on every network. Blocked devices can still camp-on and place emergency calls but the network selection is random and typically based on the network with the strongest signal.

So it can take a few attempts to place emergency calls on other networks, depending on the location.

But it's entirely achievable and can be aided by going to an area with a strong Optus, Telstra or Vodafone signal.

Once a device is found to work on every network for Emergency Calling it should be individually unblocked. *(That would require the telcos to move to an IMEI based blocking system, not a TAC system)*

Engagement on this Issue with Regulators

Over the past 18 months I would have made myself available to you, the ACMA or anyone from the Department to discuss this issue at any time, I even offered as such in my September Letter.

I am very appreciative that Ms Morice & the Mobiles Branch from the ACCC reached out last year after the July hearings. I only wish that same openness and engagement also came from the ACMA, the Department of Infrastructure or even yourself.

Meeting with ACCC - 3G Shutdown - Senate Inquiry, Submission 32 [SEC=OFFICIAL]

24 Jul 2024, 17:05

OFFICIAL

Dear Mr Parker

The purpose of this email is twofold.

The first is to invite you, to meet with the ACCC's, Mobile, Transmission and Consumer Branch, General Manager, Ms Tara Morice, to discuss your submission (no.32), to the Senate Inquiry by the Senate Standing Committee on Rural and Regional Affairs and Transport, into the shutdown of the 3G mobile network and telecommunications services accessibility.

I had what felt like a very constructive hour long meeting with her and the Mobiles Branch Team.

However I feel many of the issues discussed warranted a direct discussion with the ACMA and Department, as they were beyond the scope and powers of the ACCC.

I was asked in that meeting if I was also speaking with the TIO and ACMA as well, I said no, no-one had reached out.

I am aware that my contact details were provided (with my consent) to someone advising the Department earlier in August and that person was apparently willing to speak to me, but for whatever reason that never occurred. I was very interested in speaking with them.

I would have happily engaged very constructively and in good faith. Instead it feels like I was deemed an inconvenient nuisance and sidelined.

That may have not been the intention, but it certainly does feel that way.

I would ask that this approach to dealing with members of the public who are raising genuine concerns doesn't occur in future, as it's not conducive to good policy or outcomes.

I am very much still open and willing to discuss the post shutdown issues, and in an entirely professional and constructive way. Including with anyone from the Department, ACMA, ACCC, your staff or yourself.

I have sought to engage with anyone who's shown interest in this issue, whether that's, MPs, Senators, reporters, Radio Presenters, IT professionals, consumer advocacy organisations or members from the general public. I have spoken to many people over the last 12+ months.

I'm more than willing to provide my input and experience about what is actually happening for consumers and how this can be resolved going forward, ensuring that there is both fairness & safety, whilst understanding the past has happened.

I would like to formally request an opportunity to do so, and I hope that this request is accepted. Please confirm if this request has been accepted or not.

I can be available at any date or time, now or in the weeks ahead.

Previous Correspondence & Learnings

I should mention I would have also happily engaged in 2023 if the response letter I received from the Department sought more information and was looking to address my concerns. Instead I got a 'business as usual' letter months later that didn't positively engage with my concerns. The fact it took 4 months to get a response didn't help either.

By the time I received that response in late September I'd already had an hour long on-camera interview with 7 News about VoLTE compatibility issues including for 000, but they never aired the story and wouldn't provide an explanation.

So my cynicism on this at that time was very high.

To date I still do not know why the story wasn't aired, it was going to be aired as an exclusive apparently.

You may or may not be aware that I've travelled to Canberra twice (at my own cost) to watch the Senate Hearings, as this is an issue I care deeply about.

I've spent hundreds of hours on this issue over the past 12-18 months, from testing devices, writing inquiry submissions & letters (including this one), being interviewed, along with running a petition and more.

I appreciate that I was basically the only person to raise concerns on this issue in 2023, so therefore it would be quite easy for the Department to think nothing of my concerns and the telcos & industry quick to provide assurances everything would be fine.

Which based on FOI emails is exactly what the telcos did, despite being fully aware of the problem.

No doubt if Vodafone's switch-off hadn't occurred at the end of 2023, then we may be looking at a different situation today given the timeline of the Optus Outage and Inquiry.

Had there been official quarterly reporting from Vodafone, it too may have resulted in a different outcome.

However it seems they only saw fit to quietly remove affected devices from their website in August 2023, and I take it didn't tell anyone about it.

The telcos have always had a conflict of interest here, for the Department and regulators to just trust the reporting from industry is in my view a clear failure of due diligence, and brings into question whether the regulatory settings are fit for purpose.

To me the quarterly reports from the telcos just look like marketing brochures with well-crafted tables and graphs to paint themselves in the best possible light, whilst minimising the bigger issues and leaving out key important details, including the real number of affected 4G & 5G Devices.

The telcos weren't even telling the media about the VoLTE compatibility issues with 4G devices, let alone issues with new 5G devices. Voice over LTE wasn't mentioned once in the August 2023 TV News Coverage about the switch-off (as I wrote about in my Inquiry Submission).

Hence why I contacted both 7 News and 9 News the following day to raise the alarm. I also contacted many other major TV and news outlets as well, but 7 News was the only one to respond in 2023.

The accuracy and quality of the messaging from the telcos since the beginning has been very poor.

I'm sure the telcos have given their assurances they are being accurate with device classifications and messaging, and the representatives saying that may genuinely believe that's the case.

However if they refuse to provide any proof and allow for public transparency and scrutiny of their work, then such statements are entirely hollow.

Just how Telstra has only re-uploaded a picture of their 3G Coverage Map after the February hearings, and not reinstated the old interactive map.

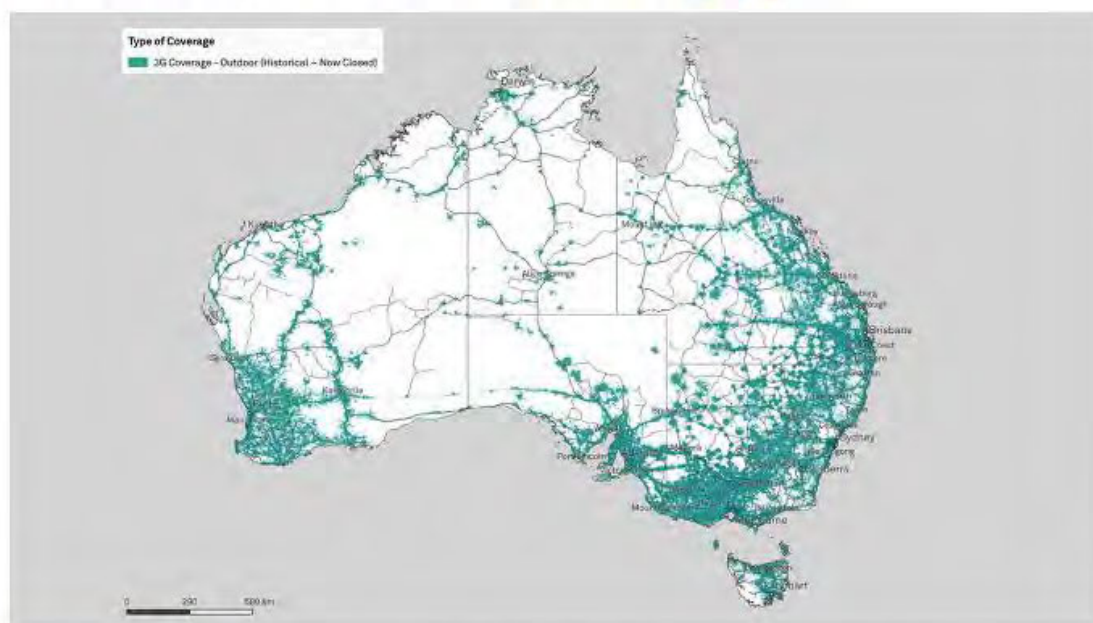
So customers have no way to accurately compare coverage at a given location from before the shutdown, if they wish to dispute it.

Historical 3G coverage map

This map shows the area covered by the Telstra 3G network before it closed.

For more detail, and to zoom in on your area, download the [full resolution 3G coverage map \(JPEG, 5.2MB\)](#)

For areas covered by 4G and 5G, check our [network coverage map](#).



[OpenStreetMap](#) contributors and the GIS user community (Current at 04.02.2025)

Telstra Support - 3G network closure

<https://www.telstra.com.au/support/mobiles-devices/3g-closure>

I will say I'm honestly somewhat reticent about writing this letter as I'm unsure how it will be responded to and if it will by extension result in even more harms to consumers.

I feel that I have only contributed to this problem and had I stayed quiet in 2023 and last year then things may have been different, though certainly not without major safety risks and impacts to consumers. *Which I tried to warn about in 2023.*

Had I known I was going to be the only person to raise VoLTE compatibility issues in 2023 then I would have provided a much more compressive letter. However I assumed this was all well-known and that common sense and fairness would prevail.

Knowing how things turned out I regret not raising the issue sooner, I would have also called on others to raise the alarm earlier. Though I am aware of others that attempted to bring this issue to the attention of the ACMA in years past but were seemingly ignored.

For your reference I originally started drafting a letter over the Christmas holidays in late 2022/early 2023, but got busy with other things so I didn't get around to sending something until 6 June 2023.

I regret not sending something earlier and I frequently think about what I could have done differently.

In any event, the ACMA's lack of engagement on this issue is a key reason behind this major public policy failure. The ACMA is the technical regulator and should be proactive in regulating the telecom sector and ensuring that these issues are properly overseen. They have not been doing that to date.

Questions on Notice

I will also say the late response by the Department to the 3G Inquiry Senate Committee on 25 February (the day before the release of the final Inquiry report) is another instance of Departmental politics taking priority of good policy.

The lack of complete answers to those questions is very disappointing and very telling.

15 - DITRDCA—Answers to questions taken on notice at a public hearing on 12 February 2025 (received 25 Feb 2025)
https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Rural_and_Regional_Affairs_and_Transport/3GNetWorkShutdown/Additional_Documents

Instead of delaying responses, perhaps it would be better to get in front of the issue and fix the problem?

It seems at no point has that been attempted, but I'm very happy to be proven wrong.

This letter should provide you and the Department with more than enough evidence to show there is a systemic misclassification of device capabilities and that the telcos are blocking compatible devices in error and aren't doing anything about it.

I'm also more than happy to expand or clarify any elements in this letter and the above issues.

Online Resources for Consumers

Given the lack of accuracy with telco messaging since the beginning and still to date, in November 2023 I wrote some device testing instructions for the YouTube Video Hugh Jeffreys published about this issue at that time.

I originally got in contact with him in late 2023 to try and raise awareness of this issue.

Then in early September 2024 I formally re-published these devices testing instructions on Medium.com after speaking with the ACCC.

How to Check for Working 4G VoLTE Calling on Android Handsets

<https://medium.com/@jamesdwho/how-to-check-for-working-volte-calling-on-android-8c343362ecfe>

Then in November 2024 I wrote some online resources for consumers to inform them about why the device blocking occurred and what they can do about it.

It's called "Australia's 3G Shutdown — Why your 4G/5G Phone is now Blocked!"

Australia's 3G Shutdown - Why your 4G/5G Phone is now Blocked!

Corporate Self Interest & the Failures of Government & Regulators

medium.com



<https://medium.com/@jamesdwho/australias-3g-shutdown-why-your-4g-5g-phone-is-now-blocked-5900cd5361e2>

That's in addition to another called "Australia's 3G Shutdown - Telcos to Block Working 4G/5G Phones!"

<https://medium.com/@jamesdwho/australias-3g-shutdown-telcos-to-block-working-4g-5g-phones-2bf41e95de8a>

Both resources go over a lot of specific detail in regards to why devices are blocked and the events that led up to the shutdown.

A shorter version of the November 2024 explainer was also published online in 'Independent Australia'.

IA - Australia's 3G shutdown: Why your 4G/5G phone is now blocked – 2024-11-12

<https://independentaustralia.net/politics/politics-display/australias-3g-shutdown-why-your-4g5g-phone-is-now-blocked,19159>

I would invite you and the Department to read those resources to understand the events in detail.

Online, that one article alone has attracted tens of thousands of views and hundreds of comments on discussion forums, online communities and the like.

It's also one of the first results on Google for "Why is my 4G/5G Phone now Blocked".

There were also a few ABC Articles about this, one of which I was featured in.

ABC - Telcos' 'delusional' bans turn customer phones to e-waste overnight – 2024-11-03 - Julian Fell

<https://www.abc.net.au/news/2024-11-03/brand-new-phones-unable-to-make-calls-3g-shutdown/104541440>

ABC - Australia's 3G network has shut down, so why are 4G and 5G users being cut off? – 2024-11-04

<https://www.abc.net.au/news/2024-11-04/australian-4g-5g-users-cut-off-after-3g-network-shutdown/104559096>

In addition to that in early November 2024 I once again collaborated with Australian Tech YouTube 'Hugh Jeffreys' to publish a video about the device blocking.

That video is now sitting at over 200K views with over 2,700 comments.



Australia's New Firewall IMEI BLOCKED 516,875 Active Phones Overnight + Tourists Phones Blocked
2024-11-10

Hugh Jeffreys ✓

The final wrap up of Australia's 3G Shutdown.

4K

'Australia's New Firewall IMEI BLOCKED 516,875 Active Phones Overnight + Tourists Phones Blocked' - Hugh Jeffreys
<https://www.youtube.com/watch?v=zIjavqEzElw>

The video he created in September prior to the blocking taking place is now sitting at 378K Views.



Australia To Block Internationally Purchased 4G/5G Phones As Part of 3G Shutdown - Starting 1st Nov
2024-09-29

Hugh Jeffreys ✓

If your provider is unable to verify VoLTE support for your device, it may be blocked from Australian networks from the 1st of November 2024.

4K

'Australia To Block Internationally Purchased 4G/5G Phones As Part of 3G Shutdown' - Hugh Jeffreys
<https://www.youtube.com/watch?v=RPITz-3estM>

Combined with the video from November 2023, there have been over 780,000 Views on this topic with over 10,000 comments.



Carriers are Killing 4G & 3G Devices - Your 4G Phone May Soon Stop Working
2023-11-26

Hugh Jeffreys ✓

A significant amount of 4G phones rely on 3G networks to make calls. The shutdown of 3G networks around the world is set to disconnect those with 4G devices.

4K

'Carriers are Killing 4G & 3G Devices — Your 4G Phone May Soon Stop Working' - Hugh Jeffreys
<https://www.youtube.com/watch?v=Q6qb9dml6So>

Online Petition

In September I created a Change.org Petition regarding the blocking of perfectly working 4G & 5G devices, it is now passing **9,400 signatures**, 90% are from Australia.



The petition is nearing 10,000 Signatures.

<https://change.org/StopTelcoDeviceBlocking>

The blocking of perfectly working devices has been a very unpopular move and I would invite you and the Department to read some of the comments online and on the petition page to see the overall sentiment.

Consumers are in need of protection here as the carriers are not adhering to the requirements of the ECS Determination and have blocked perfectly compatible 4G and 5G devices.

The ACMA doesn't appear interested in enforcing this.

This must be addressed and there is no transparency for what has occurred in this process, and no recourses for consumers.

Consumer Survey Results

In October I created an online Google Forms Survey to collect submissions from people who had their devices blocked.

The survey also asked people a number of questions about their devices, their experience, and the communication from the providers, it also surveyed them on the handling of the shutdown.

Within my survey more than 75% of respondents said they were not offered a free replacement device by their provider.

Of the over 600 Surveyed 84% said purchasing another suitable device would have a Moderate or Major Financial Impact.

73% of respondents said they were not given enough notice that their 4G/5G device would be artificially blocked from all services.

75% have said their telco has been either Mostly or Very Unhelpful.

86% said they were not well informed about the shutdown by the Government, with only 9.4% saying "Somewhat" well informed.

90% rated the handling of the Shutdown by the Industry and Government as Bad or Very Bad.

85% said they were not given enough information regarding the impacts of the Shutdown from the Industry, Government and Media.

Blocked Devices Survey - Google Sheet Results

https://docs.google.com/spreadsheets/d/1FaJYdW0I9ZydAn8gS_fo-ix73XCPJBldOoJP0Lvwpqo/edit?gid=1584988671

There are a number of issues here which raise serious concerns around the carrier compliance with the Emergency Call Service Determination, including notification to customers and the reported lack of low or no cost replacements being provided.

These concerns need to be taken seriously and properly investigated.

Real Costs to Consumers

In the ACMA's ECS Determination Explanatory Statement they did set out a 'cost-benefit analysis' and attempted to calculate the costs to consumers.

The ACMA's own estimate was in the order of \$83 Million.

The full detail of the cost distribution is shown in Table 10 above, and the total (undiscounted) costs of option 2 are summarised in Table 19 below.

Table 19: Total (undiscounted) costs for option 2

Stakeholder group	Total costs over 10 years	Proportion of costs
Total costs to Government	\$2,857,932	2%
Total costs to industry	\$65,636,508	43%
Total costs to Customers	\$83,517,366	55%

ACMA Explanatory Statement registered 24/10/2024 to F2024L01353 | Page 37
<https://www.legislation.gov.au/F2024L01353/asmade/downloads>

However the ACMA's cost benefit analysis assumed consumers would only be out of pocket around \$300 for a new phone.

But based on the data from my (600+ responder) survey, it's basically double that, with the average value of the blocked devices at around \$700.

Costs to impacted customers.

The key costs imposed on impacted customers are the replacement of handsets and the time required to make the replacement.

The replacement cost of handset is based on a like-for-like replacement which would align with a lower end telephone. Based on a review of available lower end phones from each of the carriers, this analysis used a value of \$250 – based on a lower end phone from a reputable brand (such as Samsung).

Cost of administration time is based on an estimate of 2 hours discussion time and search time and the value of leisure time of \$26.61 per hour.

Value of leisure time was estimated to be 50% of median wage.^[2] The full-time adult average weekly total earnings is reported to be \$1,995.90^[3] giving an hourly employment rate of \$53.22 (based on 37.5 hours per week). These costs arise each month as the affected phones are removed from the network.

Table 9: Costs to customers

Item	Value
Administration time	\$53
Cost to buy a new phone	\$250
Total per customer	\$303

That's also just the average cost to purchase a 'like-for-like' replacement, let alone the significant impact to the trade-in and resale value for their existing 4G or 5G device, which prior to the blocking would have been worth hundreds of dollars.

Again, within my survey **more than 75% of respondents said they were not offered a free replacement device** by their provider.

Let alone one 'like for like' and genuinely fit for purpose for the customer.

Some have told me they basically had to demand a free device be provided.

This appears to be reflected within the official number of free devices the telcos said they provided being only 35K or so (15K Telstra, 20K Optus). Approximately 250,000 4G/5G devices were blocked.

I received messages for help from people who were looking at not being able to pay their rent due to having to buy a replacement phone, fortunately for some I was able to help them enable VoLTE and switch to a provider where the phone wasn't blocked, even though it was compatible with their current provider.

Families stretched thin by ever increasing costs were sluggish with hundreds to thousands of dollars of extra costs for new phones they didn't need.

Many of the 'low or no cost' devices that were 'available' are also network locked, and the reality is, if someone found their phone blocked, they can't wait 5-7 days for a free or 'low-cost' replacement.

The first thing many people had to do was go and fork out money they didn't have for new phones they didn't need to buy.

Again, **73% of respondents said they were not given enough notice** that their 4G/5G device would be artificially blocked from all services.

Of the submissions I received, **more than 70% were for phones no older than 2020/2021.**

This includes new 5G devices that Support VoLTE Emergency Calling on every network.

If you multiply the average of \$700 by the 9,400 or so signers on my Petition that's \$6.5 Million, just from petition signers.

That \$700 across the approx 250K with 4G/5G devices that were impacted would be closer to \$175 Million in costs to consumers, not the \$83 Million forecast by the ACMA.

Even if the total impact was only \$400 it would still be over \$100 Million in costs borne by consumers, and that's just for phones.

That also completely ignores the costs to businesses, farmers and industry.

Comments from the Public

I would invite you and members of the Department to also read some of the comments I received in my Blocked Devices Survey. A PDF with the 300+ comments has been sent alongside this letter.

The other comments are also available Online in their thousands, many within the comments sections of the Hugh Jeffery's videos or within discussion threads regarding the articles I wrote.

A sample of survey comments are below. The sentiment around the shutdown has been very critical.

#	Comment
20	<i>When I spoke to my Telco about my phone being blocked they knew nothing about it. That was 3 days before it was blocked. [Nubia Red Magic 5S - NX659J - TAC: 86319804]</i>
23	<i>The decision to allow telcos to arbitrarily block devices of their choice feels corrupt</i>
25	<i>I spoke at length to my telco representative over phone and went through a number of tests and he said my phone was compatible, however when I kept getting sms messages saying the opposite I was alarmed that from within the organisation I was getting two distinctly opposite messages. Who to trust? [Galaxy S8 - SM-G950F - TAC: 35525709]</i>
31	<i>The Government has been hoodwinked into this situation by the telco industry. It is disgraceful. There is nothing in the shutdown of 3G that is in the public interest [...]</i>
36	<i>The whole thing sounds like a scam to benefit the phone retailers and telcos</i>
39	<i>I went to 2 different Telstra stores, both told me my 5G handset will work without issue based on I have 5G network and can do VOLTE, and advised me to ignore the message saying my phone will be blocked [Xperia 5 III - XQ-BQ72 - TAC: 35493043]</i>
87	<i>Should have been an option to prove a device could make E000 calls instead of batch blocking based on TAC.</i>
94	<i>Bad for ewaste, unnecessary, corporate greed</i>
108	<i>Giving someone who was previously a mobile technician four days notice of ACMA proposal to shut down perfectly capable device is a panic move, and negligent or lazy, or worse.</i>
109	<i>This is just about Telco and shareholder profits as usual.</i>
110	<i>Rushed, knee-jerk legislation</i>
119	<i>I'm on a disability pension. I saved up for so long to buy my phone. I waited for ages for it to come in special (\$999) as I could not afford its original pricing of approx \$1,800. I cannot afford to purchase an equivalent replacement phone. My phone is still in perfect condition....no scratches, chips, cracks, etc. I expected this phone to last me for at least 6 years after I purchased it. [...]</i>
129	<i>3 days (over a weekend) of notice from "we're going to block you" to being blocked is disgraceful, now I'm forced into purchasing a less capable phone just so I can continue to make phone calls for work while hoping that this can be undone.</i>
202	<i>Government makes changes, makes things worse. Story as old as time. Completely out of touch.</i>
234	<i>It's ridiculous and indicative of an out of touch government with the best interests of telcos in mind</i>
258	<i>What the government and telcos have done is completely unacceptable and despicable. Thank you for putting this together.</i>
261	<i>I have 5 phones in my family which are now all bricked by the shutdown. All are less than 1 year old</i>
267	<i>This is just another infrastructure mismanagement saga, the cost of which is being born by the tax payer.</i>
277	<i>I have the feeling that consumer rights had been deprived in this decision process</i>
278	<i>This fiasco is just another example of politicians being the stooges of business rather than advocates of the people.</i>
294	<i>Situation is completely f***ed. Replaced loads of 3G dialers with those Australian approved 4G dialers but only now we're finding out they're failing when people try to use them because of this firmware problem with Telstra. The more expensive dialers now have new Telstra updates but those ones don't.</i>
313	<i>The shutdown was completely unnecessary. My father who lives in regional NSW has no service now. He is 86 years old and is now completely isolated. He has to drive 10Kms to get flakey 4G service. Also, through no fault of my own my business has suffered as my phone got blocked and I'm out of pocket for hundreds of dollars now having to buy another phone. This is absolutely ridiculous.</i>

Correcting some Misnomers

I would also like to correct and dispel some misnomers and incorrect information that has been circulated about this issue and device compatibility.

I've read that the carriers and ACMA say the reason why some devices are blocked only on some networks is that not all phones can place emergency calls on all networks.

"Telstra has blocked your phone because that model is not configured to be able to make emergency calls on the Telstra 4G and 5G networks when the phone has a Telstra SIM card inserted. As Telstra has identified that the phone is not compatible with its network, it is required to block the phone in accordance with obligations in the Telecommunications (Emergency Call Service) Determination 2019. The ACMA is unable to compel Telstra to unblock the phone."

Response to a Petition Signer from the ACMA National Interests Section – February 2025

"Blocking of a device over one network but not the other

There are some circumstances where a phone may not work on one network but will work on another. This is because the behaviour of the phone can be impacted by the firmware settings of that phone, which dictates how calls are made depending on the carrier network being used. This may be occurring because of historical decisions made by the different network operators and phone manufacturers about the firmware of the phone and how the phone should operate over their network. It is quite possible, for example, that a device with a Telstra SIM may not be able to successfully make calls to Triple Zero over the Telstra network, whereas with an Optus SIM, it will be able to successfully make calls to Triple Zero over the Optus network. Provided that the device can successfully camp-on to the other networks (Telstra and TPG Telecom) when calling Triple Zero, this would not raise any issues of non-compliance with the ECS Determination. Camping on to another network is a separate functionality to accessing Triple Zero through use of a SIM. A phone will behave differently depending on whether a device is using a SIM with registered subscriber details available or whether it is camping-on to another network which means the device is in Limited-Service State (LSS)."

Response to a Petition Signer from the ACMA National Interests Section – March 2025

This is technically true, in a very general sense, but it's important to understand to what extent this is actually true and how this typically occurs.

Emergency Calls are performed over a specific SOS connection (bearer) and Emergency Calling is supposed to be standardised between networks (nationally and globally, at least on paper).

Where a device is able to make an Emergency call on 4G it *should* work on any network, provided the telcos have done their job right. (Which Telstra seemingly hasn't). However there are some devices that will load a different modem software/firmware (i.e profiles) when different sim cards are inserted.

Some of these older device configs (especially for Vodafone) can make regular VoLTE Calls but not Emergency Calls. (As I pointed out at the 23 July hearing and as shown above in this document)

However if the device was running a Telstra config with a Vodafone sim card inserted the device would be able to place an Emergency Call on any network (including Vodafone) as the Telstra config supports Emergency Calling. The user would just be without regular call service.

This is the behaviour I've observed with numerous Android Devices with Qualcomm chipsets across hundreds of test calls (as per my testing tables from my Inquiry submissions & ACMA ECS Submission).

I would also like to point out the ACMA representative at the 24 July 3G Senate Inquiry hearing didn't appear to be aware of this issue and assumed I was talking about 'phone number portability' when that is not the issue. I say this to raise concerns there may be a misunderstanding about the nature and exact extent of this issue, given it appears I was the person to first raise it and understand it in depth.

APH Livestreams - 3G Shutdown Senate Inquiry Hearing – 24 July 2024 – ACMA 2hrs 48mins
<https://www.youtube.com/live/HvDvnfWTou0?t=10108s>

The ACMA and telcos now seem to use this very specific 'with a sim' (config) incompatibility issue as a blanket explanation for why blocked devices that work on every network for 000 (with and without a sim) should be blocked from all carriage services.

That is just wrong and the ACMA should correct their messaging. Again there may be a misunderstanding within the ACMA about the exact nature and extent of this issue.

Within the above excerpts the ACMA does say "This may be occurring" and "It is quite possible", so it is quite clearly speculation without any real analysis.

Additionally I mentioned at the hearing on 23 July, basically all Android phones in the market are either (at a chipset level) Qualcomm or MediaTek products. There is functionally no difference between a Qualcomm Chipset in a 'supported' Samsung Phone versus a 'blocked' Sony, Xiaomi or OnePlus device.

They are underneath all the same and at a baseband (radio) level are identical.

The Carrier Modem Profiles/Configurations are Qualcomm or MediaTek formatted profiles, they are the same across brands for a given chipset generation.

Where a given chipset is known to be compatible, any device with that chipset should be allowed to connect provided VoLTE is enabled on the device for calls and Emergency Calls.

The phone brands just build phones around existing Qualcomm Platforms and Google Android Software.

Questionable 'Upgrade' Messaging

I have also observed some very questionable behaviour when testing a variety of devices on the Telstra network.

For reference some phones (such as US Model iPhone Xs and 11's) do not support Telstra's primary 4G LTE Band (Band 28 - 700Mhz). So these devices will experience limited or reduced coverage compared to Band 28 capable devices.

These devices are not blocked (as permitted by the ACMA) because they can connect to other bands, but users of these devices are subjected to warnings regarding the limited connectivity and coverage.

This includes outbound messages when making a call that state:

"Your device may have reduced network connectivity and will not always be able to call triple zero. For your safety, upgrade to a compatible device now. Call Telstra for more."

You may also be aware that Boost Mobile (Telstra MVNO) was selling Refurbished US Model iPhones that lack Band 28 to customers as recently as March last year, I made the ACCC aware of this when I spoke to them in August and since then a recall/exchange program has been established.

Choice - Retailers selling phones that could stop working properly within weeks – 2024-10-16
<https://www.choice.com.au/electronics-and-technology/phones/mobile-phones/articles/retailers-selling-phones-unprepared-for-the-3g-shutdown>

However I have also observed Telstra forcing this outbound message on some devices that actually have Band 28 and support all of the required Radio Bands for the Telstra 4G Network.

Making matters worse, I have two identical devices, both officially supported and 'compatible' according to Telstra's Online Tool.

The **phone sold by Telstra is not subjected** to any outbound RVA message but **the phone purchased retail** (which is the exact same hardware, with the exact same Telstra software) **is subjected to this message** every time a call is made.

The only difference between the devices is the Serial Number (TAC), both are otherwise perfectly identical phones.

None of this is reflected in their IMEI/TAC Checker tool, both devices are classified as “Not Blocked”, both on the frontend and checker backend.

Based on my testing it appears that Telstra is imposing this outbound message on certain TAC Codes (Device Model Numbers) of devices they didn't sell, and also depending on the detected Software Version on the device. (Also known as the IMEI-SV 'Software Version').

For example, an iPhone with an older version of iOS will also hear the *"Your device may have reduced network connectivity and will not always be able to call triple zero. For your safety, upgrade to a compatible device now. Call Telstra for more."* message.

Whereas the exact same device with an updated version of iOS **will not** hear that message, both devices have Band 28 support and both are capable of calling 000 on the Telstra network.

Telstra is telling people with perfectly compatible phones with older software that they need to “upgrade to a compatible device now” as opposed to actually telling the customer their device software needs updating.

This to me explains why I've seen a large number of perfectly compatible and officially supported devices being sold or discarded post shutdown. Prior to shutdown customers were also receiving a similar outbound message.

The 'reduced connectivity' device upgrade message **should only be played** on devices that actually lack hardware support for Band 28 (Telstra's primary 4G Band).

Telstra should be more than capable enough to have different outbound messages depending on the detected software version and TAC on the device.

Though you should be aware the IMEI-SV (Software Version) indicator is not a particularly reliable indicator of the software capabilities of a device, especially for anything that's not an iPhone.

You can have two identical phones, both with the same general software version, one can make an Emergency Call, the other cannot. As I've said previously, the determination of a device's ability to call 000 needs to be done on a per-device basis!

For reference I've observed no such outbound messages with Optus or Vodafone.

Additionally it's worth noting that Telstra (in particular) has had device manufacturers make devices for Telstra with special model codes (TACs), despite the hardware model and brand name of the phone being otherwise identical to retail variants.

So there are devices on Telstra's support list that can only be used if you bought that exact phone through a Telstra shop.

If you have a retail or alternative telco version of the exact same phone it may be blocked from all service, or subjected to outbound messages every time you make a call, even when updated with Telstra official software.

Upselling of new Devices & Services

In my view the providers and industry are only interested in selling people new products and services as the solution to compatibility or coverage issues.

That is quite clear, it's quite possibly the only thing they really know how to do and this behaviour (which I assume is accidental) shows the clear disregard in ensuring accurate messaging during this process.

Those concerns seem to only extend to the devices Telstra or its handset partners have sold.

Quite convenient.

All of the burden and responsibility has been put onto consumers, not the telcos.

Carriers (and handset makers) are more interested in selling customers new products or services to 'fix' issues, not actually supporting people with their current devices and current service.

We've seen both Telstra and Optus accused by the ACCC of upselling vulnerable customers products and services they couldn't afford and don't need.

ABC - Telstra fined \$50 million over unconscionable treatment of Indigenous phone plan customers – 2021-05-13
<https://www.abc.net.au/news/2021-05-13/telstra-fined-over-treatment-of-indigenous-phone-plan-customers/100132000>

ABC - ACCC suing Optus alleging it engaged in unconscionable conduct when selling phone products – 2024-10-31
<https://www.abc.net.au/news/2024-10-31/accc-optus-court-action-unconscionable-conduct-first-nations/104541466>

The TIO confirmed similar behaviour occurred prior to shut down at the 24 July hearing.

Ms Gebert: *"We have seen some customers coming to us who have approached their telco in order to work out what device they need and have been encouraged to purchase additional devices that may not have been a direct replacement." [...]*

"...it can mean a more expensive plan than maybe what they were on before. But we've also seen instances where there have been additional products put forward by the provider and sold as a broader package."

Rural and Regional Affairs and Transport References Committee - 24/07/2024 - Shutdown of the 3G mobile network
https://www.aph.gov.au/Parliamentary_Business/Hansard/Hansard_Display?bid=committees/commesen/28168/&sid=0000

So the fact large numbers of consumers report issues with the 3G shutdown isn't a surprise and this behaviour is par for the course in my view.

Along with Telstra and the telcos outright blocking perfectly working phones they didn't sell.

There is clearly not enough oversight or transparency with the messaging and classification of devices by the telcos, this needs independent and public oversight to ensure fairness for consumers.

It seems regulators either do not fully understand how things work and what is occurring, or simply do not care.

In my view the ACMA is not acting as a regulator, this was clear to see for anyone who watched the hearing on the 5th of February.

There are some serious questions around the ACMA's ability to regulate the sector and the perceptions of their relationship with the telcos. As recently highlighted in an ABC story by Michael Atkin.

ABC - Telco regulator under fire over deal with Optus that slashed fine – 2025-01-28 – Michael Atkin
<https://www.abc.net.au/news/2025-01-28/telecommunications-regulator-optus-telstra-parliamentary-inquiry/104862920>

Device Updates & Fixes

Despite claims and statements to the contrary, it was (and is) entirely possible for genuinely impacted 4G devices (those that actually require 3G for Emergency Calls) to be fixed with software updates.

The information from the providers and ACMA regarding this at the hearings was entirely false and misleading, to say the least. As mentioned in my Supplementary Submission 32.1.

For most devices the software already exists, it just has to be loaded on the device. This is again after all a software issue. It's not solved with new device hardware, it's solved with software.

For example a number of Samsung devices sold by telcos have been loaded with Telco Specific Firmware (Customisation aka a 'CSC') and therefore VoLTE Calling only works with that telco.

However the exact same devices sold retail have software that enables the device to work on any network for Voice over LTE. (The device switches the modem settings when different sims are inserted)

The Telco sold device and the retail device are both network unlocked and are physically identical, but if you have say an Optus Samsung Galaxy (S6 - S8) but want to use it on Telstra, then calls won't work.

Only Data, SMS and Emergency Calling will work with those devices, and Telstra classifies these devices as "Function Limited".

Brand	Model Name	Model No.	TAC	Telstra Checker Name	Telstra Feb 2025
Samsung	Galaxy S6	SM-G920I	35958506	Galaxy S6	Not Blocked
Samsung	Galaxy S6	SM-G920I	35984406	SM-G920I	Function Limited
Samsung	Galaxy S6	SM-G920I	35984606	SM-G920I	Function Limited
Samsung	Galaxy S7	SM-G930F	35650307	Galaxy S7	Not Blocked
Samsung	Galaxy S7	SM-G930F	35781008	SM-G930F	Function Limited
Samsung	Galaxy S7	SM-G930F	35815107	SM-G930F	Function Limited

It is however important to point out that this category didn't actually even exist in their checker tool prior to the shutdown and Telstra had labelled those devices as "Good news – this phone is not blocked."

Rather than "You may need to take action. While your phone is not blocked, you may experience limited service (including voice calls)."

This 'category' was only added in Late November, likely after some complaints.

There are at least 245 Phone Model 'TACs' that are classified as "Function Limited".

Which is basically just code for "Anti-competitively Limited". The 245 are all Samsung Models.

What's even more ironic is that Samsung Galaxy S8's (35781608) and Note 8's (35241809) sold by Telstra are classified on their own checker as "Function Limited".

Those TACs may have been used with other telco variants. Whereas for the S7 and S6 the Telstra sold versions are classified as "Not Blocked". (As shown above)

Samsung in partnership with the telcos could have very easily pushed out the existing Standard Retail Software as an 'automatic update' to those telco sold devices. No new software needed to be developed.

The telcos saying "they're out of support" is not a valid excuse, these devices were sold with what is essentially a defect, an anti-competitive one, but a defect nonetheless and the manufacturers & telcos should be on the hook to fix it.

Users can download the software and update those devices manually to restore call service, but it requires technical knowledge to do.

Perfectly working network unlocked devices were rendered artificially & retroactively network locked for calls due to the anticompetitive practices of the telcos and handset vendors.

These practises came out at a time when VoLTE was a marking feature and not considered critical by telcos or regulators.

There are other devices which are also technically “Function Limited” (work for 000 calls on every network but not calls on every network) that Telstra just decided to block anyway.

Same is true with Optus, including quite a few devices I own.

Shutdown Impacts on Lift Phones & Critical IOT Systems

For your reference I should also mention some of the other impacts that occurred in the days & weeks after the shutdown. I provided some of this information to the Rural and Regional Affairs Senate Committee at the time, but for the sake of transparency I will also include some of that information here.

In mid-November I was speaking to a lift technician and they had to replace the recently upgraded 4G emergency phones in lifts as they stopped working. Those phones were unknowingly broken for weeks.

The whole lift phone, intercom & IOT industry was scrambling trying to fix these issues before something terrible happened. The techs I spoke to at that time only recently became aware of the blocking legislation and the compatibility issues.

This includes lift phones that were only recently upgraded to 4G VoLTE enabled dialers last year in advance of the switch-off. These include dialers that have Official VoLTE support and were sold by local distributors.

Some dialers needed software upgrades and others appeared to have been blocked inadvertently by the telcos. Optus seemed to be the worst offender for blocking devices, though as they had no Online TAC Checker at the time I wasn't able to entirely verify this.

Though the fact that Optus is still blocking 4G Asset Trackers and Smartwatches, it indicates to me they likely did block some of these other devices.

In any event the hardware had to be replaced even though it's technically compatible with 4G. In some instances a sim swap was required as the devices didn't work on all networks anymore despite being unlocked.

This also impacted dialers used for building gates and other facility access control systems.

One gate repair technician I spoke to in November last year had about 40 pending control board replacements booked in for various schools, Body Corporates and businesses waiting for parts.

In some cases these 4G control boards would respond to SMS, but not to phone calls to open the gates.

Once the 3G Networks were shut down in November many found themselves unable to open gates or access building car parks, including Firefighters in Victoria. *I did warn about this in my June 2023 letter.*

ABC - 3G shutdown leaves fire trucks untracked and firefighters locked out of stations, union says – 2024-11-14
<https://www.abc.net.au/news/2024-11-14/fire-rescue-victoria-locked-out-stations-3g-shutdown/104598658>

It also impacted intercom systems within buildings and apartment complexes as those dialers were never subjected to any outbound ‘upgrade’ messages when in use. This meant that no-one had any warning they would stop working.

Along with vehicle trackers, farm equipment and other devices.

These issues even took experienced technicians and security system contractors with decades of experience by surprise, much of the hardware was already 4G capable and in some cases supported VoLTE calling.

But due to Telstra not supporting the most widely used Generic/Open Market VoLTE profiles these devices stopped working, once switched to an Optus or Vodafone sim everything started working fine.

The outbound 'upgrade' message should have been placed on Circuit switched calls rather than based on the device TAC/IMEI. I raised this as an issue at the hearing on 23 July that Telstra was not accurately placing that outbound message on 3G calls, but based on the device model.

Even when making a 4G VoLTE Call you would hear the message, even on devices that were capable of Emergency Calls on 4G.

International Response

Prior to the shutdown I spoke with the European Telecoms Policy Expert Rudolf van der Berg who blew the whistle on the issues with VoLTE in 2022 at the European Emergency Number Association (EENA) Conference.

EENA 2022 - Access to emergency services is being impacted by the lack of VoLTE interoperability:
<https://www.youtube.com/watch?v=sHjyLmFt-eg>

He can't quite believe what we did, he called it 'a stunning mess' and that the telcos "completely mismanaged the process". He sees the shutdowns of 2G & 3G networks as a major threat to safety due to the issues with VoLTE Calling & Emergency Calling, not to mention the competition issues.

See below.

LinkedIn Post - Australia's 3G Shutdown - Telcos to Block Working 4G/5G Phones! - Rudolf van der Berg - 2024-10-17
https://linkedin.com/posts/rudolfvanderberg_australias-3g-shutdown-telcos-to-block-activity-7252642555991879682-H5ON

LinkedIn Post - Australia shuts down 3G and blocks 'foreign' 4G phones - Rudolf van der Berg - 2024-10-28
https://www.linkedin.com/posts/rudolfvanderberg_james-parker-medium-activity-7256760712050495489-bOsM

He said to me there are major issues in the sector that the industry doesn't want to acknowledge and talk about. Especially around Emergency Calling standardisation and network compatibility.

Many people across the globe have contacted him 'off the record' to report issues. The sector is rife with anticompetitive practices by handset makers, telcos and radio equipment suppliers.

European operators have delayed shutdowns so these issues can be resolved and they can safely transition.

Again for reference, Mr van der Berg is a Partner at the Dutch Telecommunications Consultancy firm 'Stratix' and he was also an Economist/Policy Analyst at the OECD and has worked for decades in the Telecom sector within Europe.

He also told me that after posting about Australia's blocking plans, someone who works at one of the European regulators said to him that 'Australia will become a good example of what not to do and why Europe needs to wait to transition'.

It's clear we should not have led this change and I think it's clear many other countries won't make the same mistakes.

Due to the videos and articles about what happened here in Australia, consumers from around the globe are now aware of this issue and can call upon their Governments and Regulators to act.

Global 2G/3G Shutdown Delays

As mentioned at the July Hearings, a number of countries were looking at switching off either 2G or 3G within the next 12 - 18 months, however coincidentally in the last few months a number of European providers have announced further delays to their shutdowns.

As a reminder devices that lack VoLTE Calling and Emergency Calling can use 2G or 3G (Circuit Switched Fallback) for calls, roaming calls and Emergency Calls.

For example in June 2024 Swedish Provider Telia announced a further 2 year delay for shutting down 2G until 2027. Citing concerns for the Agriculture Sector and Critical Services.

RFBenchmark - Telia Delays 2G Network Shutdown in Sweden to 2027 – 2024-06-03
<https://rfbenchmark.com/en/telia-delays-2g-network-shutdown-in-sweden-to-2027/>

In October, Telia's Estonia counterpart stated that 2G services would not shutdown until at least 2029.

DCD - Telia Estonia denies plans it will retire 2G next year, expects service to last until at least 2029 – 2024-10-15
<https://www.datacenterdynamics.com/en/news/telia-estonia-denies-plans-it-will-retire-2g-next-year-expects-service-to-last-until-at-least-2029/>

In the Netherlands (home of telecoms policy expert Rudolf van der Berg) the provider KPN in December 2024 announced a 2 year delay to shutting down 2G until December 2027.

DCD - KPN extends 2G switch off date to December 2027 – 2024-12-18
<https://www.datacenterdynamics.com/en/news/kpn-extends-2g-switch-off-date-to-december-2027>

Germany's Deutsche Telekom (T-Mobile) in October 2024 confirmed they would be shutting down 2G in June 2028.

Vodafone Germany was set to switch off 2G in 2025, however has since stated that “..the switch off of the 2G technology will occur in phases up to the end of 2030.”

Lift Journal - 2G switch-off: experience and outlook – 2024-06-24
<https://www.lift-journal.com/news/2g-switch-off-experience-and-outlook>

Also as the Department is now aware, T-Mobile in the US still had a 2G Network, it was not switched off last year as originally believed by the Department at the 24 July Hearing.

The switch-off was delayed again and was due for the 9th of February 2025. Most major US providers switched off both 2G or 3G in 2022.

Still today there are some areas still with T-Mobile 2G Service.

The presence of T-Mobile's 2G Network since 2022 has been masking device compatibility and emergency calling issues, especially for roamers/tourists.

So the impacts are yet to be fully experienced in the US.

The FCC may not monitor 2G anymore, but that doesn't change anything and I don't think we should use the US as an example of a well-regulated broadband and telecoms market. Because it just isn't, in fact quite the opposite.

In Closing

No doubt as we get closer to Election Day people will consider what they'll do at the ballot box.

Now I'm not a single issue voter, nor is the 3G Shutdown and the handling of it the #1 issue on voters' minds, and as far as I can see neither major party has a plan to resolve this issue and ensure fairness.

Though there is an opportunity here to do so, and for all compatible devices.

But for many they will consider who is putting the interests of people first?

No doubt this situation has given people across the political spectrum even more reason to consider independents and minor parties.

At the core, this is an issue of fairness and it's a situation where the interests of the carriers have been placed above and at the expense of the public.

That is undeniable.

It's very much another instance of privatised gains and socialised losses. Profits flow to carriers & industry, while the public bears all the burden for this transition.

As I warned in my September letter, the changes to the Emergency Call Service Determination did result in significant financial impacts to people, and during a cost of living crisis.

In the tens to hundreds of millions of dollars.

People have not been made whole by the telcos and are still individually out of pocket hundreds to thousands of dollars.

This was entirely foreseeable and entirely preventable. The actions and inaction of the Department, ACMA, ACCC and yourself resulted in this happening. Though perhaps unintended it may be.

To not intervene on this issue even back in 2023 is a clear policy failure when it comes to dealing with cost of living. Not to mention the issues around network reliability, safety and competition

If the first thought in response to this is "well, the providers made a commercial decision and consumers were told they needed to upgrade".

Then I would ask to have a very honest self-reflection about what actually occurred, what was allowed to occur and what the telcos were empowered to do, and to listen to more than what the telcos say occurred.

People did nothing wrong. They did what they were told and upgraded to phones that work perfectly on 4G, including for 000, and they should be entitled to use the devices they own that work.

The telcos will always try to paint this situation in the best possible light for themselves, pushing the blame onto their customers, retailers or handset vendors and not taking any responsibility.

Is it correct that Telstra customers only received half a business days' notice their 4G/5G device would be artificially blocked from all services at midday on Friday the 25th of October!

It is correct that Optus never included the word "Block" in their SMS messages to customers and in some cases would only include it in the fine print of emails.

It is correct that the telcos are blocking officially compatible phones sold by their competitors and are refusing to unblock them.

It is correct that the telcos have not supplied suitable 'like for like' free replacements to customers and people were left without any means of communication when their devices were blocked.

It is correct that the blocking of devices resulted in significant financial impacts for individuals and businesses, all whilst the telcos continue to post substantial net profits to the tune of Billions of dollars.

In fact Telstra now has so much money they've announced a \$750 Million Share buyback scheme!

Reuters - Telecom giant Telstra's profit jumps, announces \$476 million (USD) buyback – 2025-02-19
<https://www.reuters.com/business/media-telecom/telecom-firm-telstra-posts-higher-first-half-profit-announces-476-million-2025-02-19/>

Given what they did to many of their customers, and were allowed to do by regulators, this is utterly disgraceful. There is just no other way to describe it.

The incentive structure since the beginning has been completely distorted, the carriers never had any incident to validate the devices they didn't sell, and simply saw fit to block them instead.

Given what has occurred and what was allowed to occur, there is no other way to describe this as completely mismanaged. *Though many would (and have) described it as much worse.*

I'm sure this may not be the view of the telcos, industry, Regulators or Department but it is absolutely incontrovertible. Even if you disagree, that's the view of the voting public.

Optus even had the audacity to describe the transition as "smooth" at the Inquiry Hearing on 5 February.

Mr Wright: "As we've just described, I think the transition has been, by all accounts, very smooth."

Rural and Regional Affairs and Transport References Committee - 5/02/2025 - Shutdown of the 3G mobile network
https://www.aph.gov.au/Parliamentary_Business/Hansard/Hansard_Display?bid=committees/commesen/28679/&sid=0000

When they themselves knew about the VoLTE Compatibility issues including for 000 as far back as 2018. It was even on their website, yet they completely failed to manage this process correctly, along with regulators and other telcos.

<https://yescrowd.optus.com.au/t5/custom/page/page-id/tp2/VoLTE-support?sid=voltesupr> Go FEB MAR MAR 13 2018 2020 About this capture

CAN I MAKE 4G VOICE CALLS TO EMERGENCY 000?

All Optus supplied VoLTE compatible handsets can make calls to Triple Zero (000) on VoLTE. Your call will be sent as normal to your chosen Emergency Service (Police, Ambulance, Fire). For other VoLTE compatible handsets that have not been supplied by Optus there may be limitations on calling Triple Zero on VoLTE in an area with no underlying 3G coverage.

Don't forget to download the [Emergency+ App](#).

I HAVE AN OPTUS VoLTE COMPATIBLE DEVICE. WHAT DO I NEED TO DO?

To make Triple Zero emergency calls over the 4G network, you'll need to update your device with the latest software. Once software is downloaded, recheck your settings to ensure 4G voice is switched on.

Please see the list of compatible devices below. These devices support VoLTE (4G voice) and calls to Triple Zero where indicated.

Optus – VoLTE Support Page – 2018-03-13
<https://web.archive.org/web/20180313194746/https://yescrowd.optus.com.au/t5/custom/page/page-id/tp2/VoLTE-support?sid=voltesupport:from:4gplus:fy2018>

Somehow blocking hundreds of thousands of 4G & 5G devices being used by customers with essentially no real notice is "smooth"?

The telcos have been rated some of the least trusted brands in Australia over many years, there is a reason for this and it's important what the telcos say and do is sufficiently scrutinised by regulators and into the future.

ACS - Information Age - Optus can't shake off 'least trusted brand' tag – 2024-06-03
<https://ia.acs.org.au/article/2024/optus-can-t-shake-off--least-trusted-brand--tag.html>

This should be a wake-up call that the telcos can't just be left to their own devices, quite literally, and we need proactive regulation of the sector.

Now all of this may sound very critical, hyperbolic even, and that may genuinely be your view and that of the Department and ACMA.

There may also be the view that I don't know what I'm talking about, and the telcos know best.

But I would ask you to genuinely consider that I, along with other affected consumers, are actually correct and the telcos haven't provided the full story.

Essentially the only recourse people now have is to take costly and time consuming legal action against the telcos, either individually or with a Class Action.

Which I should mention many people are asking me about.

Given the lack of regulation and actual compliance with the law it does seem to be the only opportunity people have to resolve this issue. It appears the ACMA doesn't care and are just letting the telcos do whatever they want.

The ACMA has failed to monitor this issue for many years despite in 2019 having 'no clear indication of intended migration paths to VoLTE Handsets' and previous Governments haven't been monitoring it either, despite this issue having existed for more than 10 years.

ACMA – 'Reconfiguring the 900 MHz band - Options paper' - April 2019

<https://acma.gov.au/sites/default/files/2019-08/IFC-11-2019-Consultation-paper-Reconfiguring%20the%20900%20MHz%20band.docx>

So will anyone take responsibility for this?

Will you as Minister intervene to protect consumers and help undo the damage inflicted by the telcos?

The Telecoms Expert Rudolf van der Berg said in his 2022 EENA presentation that *"there is nobody who feels responsible to fix this"*.

EENA 2022: Access to emergency services is being impacted by the lack of VoLTE interoperability' - 16 mins 33 sec

<https://www.youtube.com/watch?v=sHjyLmFt-eg&t=993s>

Will you take this opportunity to prove him and the world wrong?

This can be fixed and there is an opportunity to do so, and for all compatible devices.

Once again, I would like to discuss this issue further with the ACMA, Department and yourself,

I am more than happy and able to discuss this issue in an entirely professional and constructive way, and as I've done previously with the ACCC and others.

You can ask Ms Morice and the Mobiles Team yourself if you wish.

I would like to once again formally request an opportunity to do so and I hope this request is accepted. I can be available at any date or time and in any capacity.

I would appreciate a prompt confirmation regarding the acceptance (or decline) of my request for the opportunity to discuss this with the Department, ACMA, or yourself.

I look forward to your response and hope to see the above issues being resolved in the coming weeks.

Thank you for your time.

Regards

James Parker

*Electorate of Lilley
Brisbane, QLD*

OFFICIAL



Australian Government

**Department of Infrastructure,
Transport, Regional Development,
Communications and the Arts**

Ref: MC25-003909

James Parker

via: [REDACTED]

Dear Mr Parker

Thank you for your email of 28 March 2025 to the Hon Michelle Rowland MP, Minister for Communications, concerning the 3G network switch off. Your email was referred to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts for response.

With the announcement by the Prime Minister, the Hon Anthony Albanese MP, of the forthcoming election on 3 May 2025, the Australian Government has assumed a caretaker role. The Government is operating in accordance with the caretaker conventions pending the outcome of the 2025 federal election. During this period, by convention, decisions are not taken or advice given, that is likely to commit an incoming Government. Further information about these conventions can be found at www.pmc.gov.au/resources/guidance-caretaker-conventions.

The matters you have raised relate to the enforcement of the *Telecommunications (Emergency Call Service) Determination 2019*, for which the Australian Communications and Media Authority (ACMA) is responsible. Therefore, the Department has referred your letter and its attachments to the ACMA for its consideration.

You may like to write again to the Government after the outcome of the election is known.

I trust this information will be of assistance.

Yours sincerely

[REDACTED]

Shanyn Sparreboom
Assistant Secretary
Competition and Spectrum Branch

OFFICIAL

28/04/2025