



Department of Government Services

Level 5
1 Macarthur Street
East Melbourne Victoria 3002
Telephone: (03) 9651 5111
dgs.vic.gov.au

Our ref: BMIN-260200266

The Manager
Telecommunications Performance and Regulation Section
Australian Communications and Media Authority
PO Box 13112
Law Courts
MELBOURNE VIC 8110

Dear Manager

CONSULTATIONS ON PROPOSED PUBLIC REGISTER OF TELECOMMUNICATIONS OUTAGES AND MOBILE COVERAGE MAPPING

I am writing in relation to the proposed amendments to the *Telecommunications (Customer Communications for Outages) Industry Standard 2024* and the draft *Telecommunications (Mobile Network Coverage Maps) Standard 2026*.

The reporting of outages and presentation of mobile coverage information are related as they both deal with providing transparent information to the public on telecommunications service availability.

The Department of Government Services has prepared a consolidated response to both consultations as a more meaningful outcome will be achieved by considering both matters together as part of a single solution. Responses to relevant questions to each of the consultations can be found in [Appendix A and B](#) below.

Currently, there are major barriers to effective use of carrier coverage information by state and local governments, businesses, and consumers to inform decision-making. Many of these uses, such as providing vital information during emergencies or ensuring new housing developments are built with adequate mobile coverage, are predictable and serve a public interest.

The usability of carrier coverage and service outage information is severely diminished when it is not presented in a consistent, timely and location-based way. A single source of real-time visual mapping that combines information from multiple carriers is required to meet this need.

The Victorian Government has consistently advocated for a requirement for carriers to share real-time network information that can be used by emergency services organisations to facilitate response to emergencies and outages.

In both its submissions to the *Bean Review into the Optus Outage of 8 November 2023* and the *2024 Regional Telecommunications Review*, the Victorian Government has called for a

stronger approach to data sharing to assist in planning for and responding to natural disasters and other threats to telecommunications networks.

Both submissions advocated for:

- a single national telecommunications data platform to avoid the inefficiency and operation limitations of multiple telecommunications carriers and jurisdictions establishing proprietary systems
- for all national carriers to provide real-time and geospatial data on coverage and availability of telecommunications services in emergencies and outages.

This would provide the necessary intelligence for emergency responders and planners to understand at a location level the types of services available to the community during any stage of an emergency.

A national data platform would also support non-emergency telecommunications data requirements, such as for the national Telecommunications In New Developments (TIND) policy, prioritising investment from government mobile black spot programs, and improving consumer access to information.

At this stage, the Australian Communications and Media Authority (ACMA) should develop stronger carrier requirements that would enable progress towards real-time, geospatial data on a single national platform.

I encourage ACMA to consider the Victorian Government's long-standing advocacy for stronger data-sharing requirements. The Victorian Minister for Government Services has written to the Commonwealth Minister for Communications advocating the same points.

If you require further information, you may contact [REDACTED] Director – Telecommunication Policy on [REDACTED] or via [REDACTED].

Yours sincerely,

[REDACTED]

John Batho

Deputy Secretary, Digital and Government Services

11/04/2026

Appendix A – Responses to questions from the ‘Proposed public register of telecommunications outages’ consultation

Q5: Are there any additional content elements aligned to the outages register direction’s objectives that should be included in the outages register? Please list these and provide reasons as to why they ought to be included.

Both consumers and Emergency Services Organisations (ESO) require more information than a plain English description of an outage from carriers.

Information relating to areas experiencing the outage and any known affected telecommunications infrastructure (if known) should form the basis of the information provided to consumers and ESOs.

Spatial/polygon mapping of an outage from carriers is required for ESOs to triage and act if required. A standardised approach to this mapping will allow for more accurate and timelier cross-carrier analysis and coordinated responses. This information would also facilitate the general public in finding the nearest, usable coverage in the case of an outage.

Q8: Noting that information in the outage register needs to be extractable, should the Customer Communications for Outages (CCO) standard specify a minimum structured format (for example, a downloadable file or machine-readable format such as CSV), or allow flexibility for carriers to choose their own approach? What benefits or challenges would each option create?

Information provided should be consistent across carriers in a file format that allows for aggregation, overlaying and comparison by ESOs. This extends to spatial data.

Allowing carriers to have flexibility in approach will likely result in discrepancies in data from one carrier to the next, resulting in inconsistent and less accurate information for ESOs and other relevant stakeholders.

A centralised data platform, including a standardised API, that presents a single source of information would ensure carrier data is comparable and consistent.

Broader operation of the CCO standard questions

Q13: Should the CCO standard be extended to include communications with customers about planned outages, noting that these can cause impacts to triple zero connection? Please provide reasons. If so:

(b) Should the obligations for planned outages differ from those obligations for unplanned outages? If so, how?

Outages, planned or unplanned, should be treated consistently under the CCO standard. There are implications for public safety and access to emergency services during any kind of outage due to the potential impact to Triple Zero access.

Appendix B - Responses to questions from the ‘Proposal to make mobile coverage mapping standard’ consultation

Q1: What are your views about the proposed coverage levels and their meaning? Are 4 levels adequate for enhancing consumer understanding of coverage?

While the proposed coverage level categorisations is a positive step forward, the classification does not give a customer a reliable sense of the quality of a connection. Using the metric of ‘db’ is misleading when used in isolation for a number of reasons:

- 4G and 5G networks behave differently utilising different spectrum bands. Each provider can deploy different spectrums on different towers resulting in variable actual coverage.
- While spectrum propagation is important, it is limited by the amount of backhaul configured at each tower which can have drastically different performance outcomes for consumers.

There will need to be a mechanism to assess whether carriers are meeting the required signal-strength coverage thresholds, including defined reporting requirements from carriers.

An integrated tool that provides more granular coverage information and reflects real-world performance should be developed to enable people and businesses to understand the coverage options and quality available to them. This would support more informed decisions around where people choose to live and work when connectivity is a high priority.

Q2: Are there additional assumptions or limitations, beyond what is proposed, that should be disclosed to consumers?

Overall capacity of a network should be considered when communicating coverage to a consumer or relevant stakeholder. Capacity typically includes variables such as backhaul, throughput and contention.

The current proposed predictive coverage modelling is not a reliable way to represent actual mobile coverage. There should be consideration of how the predicted coverage could be verified or audited, especially for communities or customers that report consistent poor performance. Coverage verified in this way should be fed back into public coverage maps.

Q10: The draft standard requires MNOs to publish coverage maps in a manner that allows the underlying data to be extracted by ESOs for analysis purposes. Are there any technical, operational, or data quality issues that may affect the utility of this provision?

The proposed approach for each carrier publishing coverage information will likely not achieve the outcomes driving the development of this standard. Each carrier, as the standard is currently written, will have flexibility to publish this information without conforming to common presentation standards. Falling short of a standardised way of presenting this will create significant challenges for consumers and other parties (such as ESOs) to compare and overlay coverage from carrier to carrier.

While the proposed standard makes accommodations for external parties such as ESOs to retrieve information from carriers, there is no practical solution or consistent standard in how this will be achieved. A centralised national data platform where external organisations can access this information would be an appropriate solution for this.

A centralised platform and/or standardised API should be available so that meaningful, comparable and consistent information can be accessed for the purposes of:

- real-time service availability outage information for public safety and emergency management
- to support the targeting of Commonwealth and State mobile coverage funding programs, such as the Mobile Black Spots Program
- providing developers, urban planners, local government, and home buyers information necessary for the implementation of the national Telecommunications In New Developments (TIND) policy
- greater transparency for customers of mobile networks.

A major barrier to effective use of carrier coverage information by state and local governments, businesses, and consumers will be the need to separately develop access agreements with carriers, processes for managing carrier information, and visualisation platforms specific their requirements. Many of these uses are predictable, serve a public interest and could be addressed by a national platform.