



5 June 2025

[REDACTED]  
[REDACTED]  
ACMA  
65 Pirrama Rd,  
Sydney NSW 2009

Email: [REDACTED]

Dear [REDACTED]

**Re: Requirements to identify and block mobile phones unable to call Triple Zero (ACMA2024/450)**

Thank you for your letter of 21 May 2025 requesting detailed information regarding the blocking requirements as contained in the Emergency Call Service Determination 2019 incorporating the 2024 Amendment ("ECSD").

Telstra's response to these questions can be found below and in the attached documents; some of this information is commercially sensitive so please treat all of this response as confidential and do not share with other parties without our consent

Telstra has taken a "customer safety first" approach to blocking devices that cannot 000 calls. We have blocked any devices where we were not confident they would not be able to make a successful 000 call on the 4G/LTE network. If it is subsequently proven that a blocked device can indeed make a 000 call, we have processes in place to unblock that device.

***Describe in detail Telstra's process for determining which mobile phones are blocked***

**Blocking**

1. Telstra identifies mobile phones that may be <sup>1</sup> non-compliant with the revised ECS Determination (i.e. incapable of making 000 calls over the 4G/LTE Telstra network) through one or more of the following methods:
  - a. Testing devices in the Telstra Device Certification Lab
  - b. Reviewing reports and certification results from mobile phone manufacturers
  - c. Analysis of call detail records (CDRs) (for regular voice calls as well as calls to 000<sup>2</sup>).

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<sup>1</sup> CDR analysis for regular calls as well as calls to 000 may be inconclusive in some cases, especially in cases where there were few calls to analyse. In these cases, Telstra errs on the side of caution and blocks these phones in the interest of public safety

<sup>2</sup> So far, more than 10 million 000 call CDRs have been analysed over a period spanning more than 12 months



2. Based on this testing, some phones are validated and classified as not being capable of making emergency calls. There are three broad categories, namely:
  - a. 3G Data | 3G Voice | 3G 000 Voice: Phones using 3G for data as well as voice calls (including calls to 000)
  - b. 4G Data | 3G Voice | 3G 000 Voice: Phones using 4G/LTE for data, but using 3G for Voice calls (including calls to 000)
  - c. 4G Data | 4G Voice | 3G 000 Voice: Phones using 4G/LTE for data, using 4G/LTE for Voice calls except voice calls to 000, with 000 calls being made on 3G.
3. Phones identified in these categories are blocked by adding their Type Allocation Codes (TACs) to the blocklist maintained by Telstra.<sup>3</sup> When these devices try to attach to the Telstra network the attach request is rejected. This is true for all customer types (Telstra's own customers, Telstra's Wholesale/Mobile Virtual Network Operator (MVNO) customers as well as incoming International Roamers).

Note: Consistent with the "customer safety first" approach, since 2015 Telstra has also blocked devices that were not confirmed as being VoLTE 000 capable (to ensure proper handling in LTE-only areas) by only permitting phones with "Telstra" in the SIP User Agent header to make calls. This arrangement transitioned to the TAC-based blocking solution as part of the 3G exit. After the 3G exit Telstra made changes to its voice calling environment to remove the requirement to check for "Telstra" in the SIP User Agent header.

#### Unblocking

1. We have a process for unblocking a device model (and associated Type Allocation Code (TAC)) if it was incorrectly classified as non-compliant. This involves:
  - a. Reviewing reports and certification results from the mobile phone manufacturer, and/or
  - b. Testing of the device in the Telstra Device Certification Lab
2. If it is confirmed that the blocked device is capable of making 000 calls over 4G/LTE, the barred TAC entry is removed from the blocklist. The effect is to immediately allow devices with this TAC to use Telstra's network. Telstra's [Device Capability Checker](#) webpage is also updated accordingly.

***Advise which specific devices have been blocked, and, for each device, advise of Telstra's reason for blocking it***

In each case, the reason for blocking the device is because we considered it would have been unable to make a call to emergency services once all 3G networks in Australia closed.

No new device models (and their associated TACs) have been added to the blocked list subsequent to the implementation of the new ECSD rules in October 2024.

<sup>3</sup> Different Mobile Network Operators may classify a handset model differently, based on testing, CDR analysis, manufacturer attestations etc.



372 TACs have been unblocked subsequent to the implementation of the new rules in October 2024 due to Telstra receiving updated reports from phone manufacturers. More TACs will be unblocked in future if evidence emerges to support them being unblocked.

| Blocked Category                  | Number of TACs |
|-----------------------------------|----------------|
| 3G Data   3G Voice   3G 000 Voice | ██████         |
| 4G Data   3G Voice   3G 000 Voice | ██████         |
| 4G Data   4G Voice   3G 000 Voice | ██             |
| <b>TOTAL:</b>                     | ██████         |

**Table 1: Summary of Blocked TACs (end May 2025)**

Please refer to the attached document for the full list of TACs currently blocked on the Telstra network.

***The total number of mobile phones that have been blocked since commencement of the new rules***

In terms of tracking the number of unique phones that have been blocked under the ECSD: Telstra only keeps detailed statistics of this metric for the last 30 days. Table 2 below sets out the number of devices blocked over 30 days, in May 2025:

| Blocked Category                               | Unique Devices Blocked |
|------------------------------------------------|------------------------|
| Handsets Attempting to use the Telstra Network | ██████                 |

**Table 2: Number of Blocked Devices over last 30 Days**

***The total number of mobile phones identified on your network each month since commencement of the new rules***

Please see Table 3 below for the number of handsets on the Telstra network. This includes handsets of Telstra's own customers as well as handsets of Wholesale customers (i.e. Mobile Virtual Network Operators (MVNOs) using the Telstra network).

| Date          | Number of Handsets |
|---------------|--------------------|
| 2024 October  | ██████             |
| 2024 November | ██████             |
| 2024 December | ██████             |
| 2025 January  | ██████             |
| 2025 February | ██████             |
| 2025 March    | ██████             |
| 2025 April    | ██████             |
| 2025 May      | ██████             |

**Table 3: Number of Handsets on the Telstra Network**



***The total number of customers that have utilised assistance under your payment assistance policy and obtained a free or low-cost phone since commencement of the new rules.***

Please refer to Table 4 below for the statistics of the free and discounted devices supplied to our own customers.<sup>4</sup>

Note - it is not possible to separate the ECSD-related transactions from our own 3G exit initiatives for the Free Reactive and Discounted Retail Channel categories. Also, some devices were returned to sender and not all delivered devices were necessarily activated.

| Free                                            |                               | Discounted                                  |
|-------------------------------------------------|-------------------------------|---------------------------------------------|
| Proactive <sup>5</sup><br>(June – October 2024) |                               | Via Retail Channel<br>(May – November 2024) |
| ECSD                                            | 3G Exit (Telstra initiatives) | ECSD and 3G Exit (Telstra initiatives)      |
|                                                 |                               |                                             |

**Table 4: Summary of Free and Discounted Devices Provided**

Subsequent to December 2024 and finalisation of the 3G Exit, any request for free or discounted devices relating to the ECSD Amendment fall under and are captured under Telstra's general payment assistance policy; statistics directly linked to ECSD Amendment-related assistance are not available for this period.

We have no other comments to offer at this time other than to note the separate engagement between the ACMA and Telstra regarding the ECSD and the blocking of mobile phones of foreign travellers.

If you have any questions regarding any aspect of this letter, please contact me on [REDACTED] or by email at [REDACTED]

Yours sincerely,

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

<sup>4</sup> We do not have visibility of assistance offered to customers of MVNOs or multi-brand partners (e.g., JB Hi-Fi, Good-Guys, etc) who use the Telstra network

<sup>5</sup> Proactive – devices proactively sent to impacted customers identified as high risk

<sup>6</sup> Reactive – devices sent to customers after they contacted Telstra requesting assistance