

11 July 2025

Ms [REDACTED]
[REDACTED]
[REDACTED]
Australian Communications and Media Authority

Email:

Dear [REDACTED]

Re: Requirements to identify and block mobile phones unable to call Triple Zero

Thank you for your letter dated 21 May regarding the effectiveness of industry arrangements for the identification and blocking of mobile phones unable to call Triple Zero under the *Telecommunications (Emergency Call Service) Determination 2019*. We appreciate the opportunity to contribute to this important discussion on enhancing public safety through reliable access to emergency services.

Optus remains committed to ensuring that all Australians can access emergency services when needed, and we welcome the chance to outline our approach and share our ongoing efforts in this area.

The initial list of unsafe handsets (TACs) was developed through a comprehensive and collaborative process, which included:

- Engagement with handset manufacturers;
- Targeted device testing;
- In-depth analysis of network call records; and
- Alignment across the telecommunications industry.

Optus continues to actively monitor its network to identify new TACs. For devices lacking verifiable emergency call capability, we assess network behaviour over time to determine their functionality. We have provided detailed responses to your specific queries below.

As you may recall, Optus and Telstra jointly commissioned an independent telecommunications expert to review our methodologies for identifying impacted devices. The resulting *3G Closure Device Testing Assurance Review* concluded that our processes are “based on sound and established industry practices.” This report was submitted to the Minister and the Department in September 2024.

We appreciate your invitation to provide feedback on potential improvements to the current system. Optus strongly supports the development of a unified, authoritative list of approved devices capable of making emergency calls across all Australian mobile networks. Ideally, this list would be maintained by the ACMA, given its regulatory role in consumer equipment standards. While we recognise that establishing such a system may take time, we believe the following two steps would provide a strong foundation:

1. Industry-Wide Device Register

Optus supports the creation of a unified industry list of impacted devices to ensure consistent blocking practices across all Mobile Network Operators (MNOs). While we have advocated for this approach, industry consensus has not yet been reached. We encourage the ACMA to consider leading the collation of this information into a central register.

2. Enhanced Compliance and Education

Compliance with handset equipment rules primarily rests with importers and manufacturers. Our experience suggests that many are either unaware of Australian regulations or reluctant to demonstrate compliance. We believe there is significant value in the ACMA prioritising education and enforcement in this area to ensure only compliant and safe devices are imported and sold in Australia.

Optus remains fully committed to supporting public safety and working collaboratively with government and industry stakeholders to uphold the integrity of emergency call services. Please do not hesitate to contact me should you have any further questions or require additional information.

Yours Sincerely



