



Australian Government

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

Triple Zero service outage

SUBMISSION TO THE ENVIRONMENT AND COMMUNICATIONS REFERENCES COMMITTEE

24 November 2025

The Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (the department) welcomes the opportunity to make this submission to the Senate Environment and Communications References Committee's inquiry into the Triple Zero service outage on 18 September 2025.

Triple Zero is an essential community service and it is critical all Australians can have confidence that in an emergency, they can reach police, fire, and ambulance services. The operation of the Triple Zero service relies on many organisations efficiently and effectively working together.

The department is responsible for providing advice to the Australian Government on matters relating to telecommunications and the operation of emergency call systems, including Triple Zero. In March 2025, the Department established the Triple Zero Custodian (the Custodian) following the Australian Government's response to the review into the 2023 Optus outage (the Bean Review). The *Telecommunications Legislation Amendment (Triple Zero Custodian and Emergency Calling Powers) Act 2025* (the Act) came into effect on 31 October 2025 and cements the Custodian's legislative functions within the department. The Custodian oversees the Triple Zero ecosystem to ensure it is operating effectively, and is coordinated, connected, and responsive. This includes preparing for, responding to, or recovering from outages.

This submission outlines the functions and powers of the Custodian, its role within the Triple Zero ecosystem, its activities to date, and the program of work to build out its capabilities and implement its new functions and powers.

For details on the timeline of the Optus Triple Zero service outage of 18 September 2025, including notification of the department and Minister for Communications, the Committee may wish to refer to evidence provided at the Environment and Communications 2025-26 Supplementary budget estimates hearing on 8 October 2025. The department also notes:

- The ACMA is investigating any contraventions of the Telecommunications (Emergency Call Service) Determination 2019 (the ECS Determination) and other relevant standards or legislation.
- Optus has committed to an internal review and investigation into the outage and has noted its full commitment to any investigations led by government.

Triple Zero Ecosystem

The Triple Zero service is reliant on a multi-layered ecosystem of interdependent functions. These functions are operated by industry, state and federal government organisations, all of which must work together to deliver a reliable, accessible and responsive service. A failure at any point in the system could prevent Australians from accessing help in an emergency, obscure vital information, delay a response, or divert vital resources. The key roles in this ecosystem are:

Emergency Call Person (ECP)	Operates the service that answers calls to Triple Zero and transfers them, with relevant information, to the requested emergency services. Telstra is the ECP for the Triple Zero service and Concentrix is the ECP for the 106 Emergency Call Number.
Emergency Service Organisations	Includes state and territory police, fire and ambulance services. Once calls are received, these services will be notified and deployed.
Telecommunications Carriers and Providers	Provide the services and networks which enable calls to Triple Zero. Telecommunications providers, including mobile network operators (Telstra, Optus, TPG Telecom) are responsible for investigating and fixing outages affecting their networks and services.
The Australian Communications and Media Authority (ACMA)	Sectoral regulator for the telecommunications industry. The ACMA is responsible for investigating potential breaches of regulatory obligations under telecommunications legislation.
Department	The department supports a competitive and innovative communications sector so that all Australians, including in regional and First Nations communities, have equitable access to digital technologies and communication services. The department achieves this through various policy, program, and regulatory functions.
The Custodian	The Triple Zero Custodian has been established as a function of the department to oversee the effective operation and coordination of the Triple Zero system. The Custodian manages the government's contracts with the two ECPs. It also chairs the Triple Zero Consultative Committee (TZCC) and is an observer at the National Emergency Communications Working Group.

The Bean Review

On 8 November 2023, the Optus network suffered a national outage which impacted Australians' access to emergency services. Following the outage, the government announced that the department would conduct a Post Incident Review led by the former ACMA Deputy Chair, Mr Richard Bean, examining what industry, government and the community can learn from the event. A primary focus of the Bean Review was the functioning of the Triple Zero service during the outage and whether changes were required to safeguard Australians' access to Triple Zero in the event of future outages.

Mr Bean submitted his final report to the government on 21 March 2024. It included 18 recommendations to address structural issues within the telecommunications ecosystem. A key recommendation was that government establish a Triple Zero Custodian with oversight of, and overarching responsibility for, the efficient functioning and co-ordination of the Triple Zero ecosystem.

On 30 April 2024, the government published its response to the Bean Review agreeing to all recommendations.

The Government has fully implemented 15 of the 18 recommendations of the Bean Review, with the remaining three underway.

Overview of the Custodian

Establishment

The department established the Custodian as an administrative unit in March 2025, informed by advice from a steering committee process, led by the Telecommunications Industry Ombudsman. The Custodian's legislative function was confirmed by the *Telecommunications Legislation Amendment (Triple Zero Custodian and Emergency Calling Powers) Act 2025* (the Act), which commenced on 31 October 2025. The Act sets out the Custodian's functions and powers.

On 27 October 2025, the department established the Triple Zero Custodian Division within the Communications and Media Group to further operationalise this new function. The Division includes two Branches: The Triple Zero Custodian Implementation Branch and the Triple Zero Custodian Operations Branch.

The Custodian legislation enables the Secretary of the department, or a delegated official of the Secretary, to undertake the functions of the Custodian. On 1 November 2025, the Secretary made an instrument under section 151P of the *Telecommunications (Consumer Protection and Services Standards) Act 1999* to delegate the Custodian's functions and powers to SES officers.

This means that, in practice, the Triple Zero Custodian is not a single individual. Rather, the department has established a division to deliver on its work and delegated the legislative powers to the Division's SES officers.

Functions

The Custodian is the coordinating body for the management of the end-to-end Triple Zero ecosystem. The Custodian is intended to maintain effective oversight of emergency call services and help safeguard the continued availability of emergency calling to all Australians. The Act imparts the following functions on the Custodian:

- aiding preparation for, response to, or recovery from outages interrupting emergency call services;
- improving preparedness for such outages;
- overseeing the effective functioning of emergency call services and related matters; and
- other functions specified by legislative instrument by the Minister for Communications.

Powers

The Act also establishes new powers to support these functions and enable the government to better monitor and coordinate the Triple Zero ecosystem. These include new directions powers for the ACMA. The Custodian can also make use of these powers by requesting the ACMA issue a direction to compel information or require action by carriers, carriage service providers, or ECPs. There are significant penalties for non-compliance with a direction, with civil penalties of up to \$30 million for each contravention.

ACMA Directions Powers

Under the Act, the ACMA may issue a carrier, carriage service provider or Emergency Call Person, who is not an individual, with a written direction relating to an emergency call service matter (ECS Direction). An ECS Direction may require the recipient to provide the ACMA with information, or to take certain actions.

The direction may require information about:

- policies, procedures, or processes relating to an emergency call service matter;
- installation, operation, maintenance or testing of equipment and software relating to an emergency call service matter;
- details of a specific outage event that has, or may, result in Australians being unable to contact an emergency call service;
- the impacts and handling of such an outage; or
- any actions the ACMA has directed them to take under an ECS Direction.

The ACMA may also direct a carrier, carriage service provider, or Emergency Call Person to:

- take certain actions to develop policies, procedures and processes relating to an emergency call service;
- provide information to another person or organisation; or
- consult, or take certain actions related to consulting with, a person or organisation.

The ACMA must notify the Custodian when it issues an ECS Direction and provide 6-monthly reporting to the Minister on directions given, investigations referred from the Custodian, decisions made and any other activities relevant to the Custodian legislation.

Custodian Powers

Under the Act, the Custodian may, where it considers it necessary or appropriate:

- Require the ACMA issue an ECS Direction. The ACMA must provide the Custodian with any information it receives in response, as well as the ACMA's view of the information, if any.
- Require the ACMA provide information or advice on an emergency call service matter, including information it may have received in response to any ECS Direction.
- Refer a matter to the ACMA for investigation under Part 26 of the *Telecommunications Act 1997*.

State and Territory Organisations

The Australian Government has limited constitutional power in relation to emergency management, which is primarily the responsibility of the States and Territories. The government, through the National Emergency Management Agency (NEMA), provides oversight and guidance to coordinate disaster and emergency management efforts.

The Act does not establish any power that would enable the Custodian or the ACMA to direct a State or Territory, or agency thereof. Emergency Service Organisations (ESOs) retain responsibility for issues within their jurisdictions. However, the Custodian will work closely and collaboratively with State and Territory governments and ESOs to ensure the Triple Zero Ecosystem is operating effectively.

Key Activities

Sector consultation

The department has engaged actively and broadly with actors in the Triple Zero ecosystem to clarify roles and establish effective working arrangements. The Custodian has met with all carriers, the ECP, emergency service organisation representatives and consumer groups since its establishment in March 2025.

National Telecom Resilience Centre

The department is working with University Technology Sydney's (UTS) National Telecommunications Resilience Centre to develop the capability to comprehensively test Triple Zero calls on and across mobile networks. The mobile network operators are also working closely with UTS to test the ability of different mobile phones (make and model) to make emergency calls under a range of scenarios.

The department is continuing to work with UTS to develop a roadmap and device selection methodology for future testing phases, in consultation with industry.

Simulation Exercises

On 20 October 2025, the Custodian facilitated and participated in a large-scale simulation exercise with 130 participants from across the emergency call ecosystem. On 30 October 2025, the Custodian wrote to participants on outcomes and next steps and will monitor delivery of actions. This includes the development of a real-time network data platform and coordinating additional exercises to support continuous improvement.

ECS Directions

On 3 November 2025, with minor revisions on 7 November, the Custodian issued its first request for ACMA to make an ECS Direction under section 151L of the *Telecommunications (Consumer Protection and Service Standards) Act 1999*. The request sought information from Optus on its policies and procedures in an outage, including those relating to notification, welfare checks, and recovery; as well as its outage testing prior to system changes. The ACMA issued the direction on 14 November 2025.

Priority work streams for late 2025 and early 2026

The Custodian's work priorities for late 2025 and early 2026 have been informed by lessons from the 18 September Optus Triple Zero outage. These will focus on ensuring communication channels across the ecosystem work effectively, critical information is shared when required and appropriate and timely actions are undertaken to protect access to Triple Zero.

On 13 November 2025 the Custodian wrote to the ACMA outlining these priorities which include:

- **Device compliance** – working with the ACMA surrounding device compliance and possible databases.
- **Triple Zero disruption notifications** – considering what regulatory actions should be undertaken to address any gaps in the current notifications framework.
- **Transparency of Information held by the Emergency Call Person** – considering options to require the ECP to proactively act on and notify relevant stakeholders of any known or suspected impact on calls to Triple Zero.
- **Mutual assistance arrangements** – considering options to promote and, if necessary, compel carriers and the ECP to enter into mutual assistance arrangements to share information critical to the carriage of calls to Triple Zero.

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- **Network testing** – working with the ACMA to consider regulatory options to improve network reliability, including regular network testing and in advance of any network upgrades.
- **Welfare check procedures** – continuing to gather information from carriers on their welfare check processes with a view to moving to a standardised mandatory approach across industry.

Future work streams

The department will develop a detailed forward work plan for the Custodian, with new priority work streams added as the existing work streams are finalised. Medium to longer term issues could include, but are not limited to, the future of the emergency call service, the impact of new technologies, public education and messaging, and establishing baseline data and metrics.