



Telecommunications  
Industry  
Ombudsman

# Triple Zero Custodian Steering Committee Final Report

28 November 2024

## Triple Zero Custodian Steering Committee Final Report November 2024

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## Triple Zero Custodian Steering Committee Final Report November 2024

## Executive Summary

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The Triple Zero Custodian Steering Committee (the Steering Committee) is pleased to present the proposed model for the establishment of a Triple Zero Custodian (Custodian) for Government's consideration and response.

The Independent Review of the Optus Network Outage (the Bean Review) found that overarching responsibility for, and visibility of, the functioning of the Triple Zero service in one person or organisation would have significantly improved information flow and recovery efforts on the day of the outage. Recommendation 2 of the Bean Review called for the establishment of a Custodian to have end-to-end oversight of the Triple Zero ecosystem. The Government accepted this recommendation subject to further investigation and consultation.<sup>1</sup>

The Government asked the Telecommunications Industry Ombudsman (the TIO) to chair a Steering Committee made up of representatives from the Triple Zero ecosystem to scope the role, functions and structure of the Custodian, including whether it should be established as a new agency, or as a new function within an existing organisation or even across organisations.

There was overwhelming consensus from the Steering Committee on the need for the Custodian function. This Final Report represents views from the Steering Committee on a preferred model for the Custodian, including its overarching objectives, functions, powers and governance arrangements.

The Steering Committee recommends that Government establish the "Office of the Triple Zero Custodian" within an already existing Commonwealth entity, to support the effective and continued operation, improvement, and advancement of the Triple Zero Emergency Call Service. The "Office of the Triple Zero Custodian" should be supported by appropriate powers to fulfil its overarching objective and specified functions.

A new body was not recommended due to the expected costs and time it would take to establish. Utilising an existing entity can also leverage existing expertise and relationships within the sectors.

The Steering Committee were strongly of the view that the Custodian be capable of operating 24/7/365 to ensure availability during events. For that reason, most members supported the Custodian function sitting within the National Emergency Management Agency (NEMA), which also has the required emergency operational expertise.

The proposed model leaves this as a decision for Government, noting that no matter where the Custodian sits, it will need to be appropriately resourced and staffed with expertise to undertake its functions as specified in this report. This may require additional consultation with stakeholders.

Finally, the Steering Committee recommends that an independent review of the effectiveness of the Custodian commence 12 months after its establishment, to ensure that the Custodian is meeting its overarching objectives and that its specified functions are still fit for purpose.

The Steering Committee thanks the Minister for Communications, the Hon. Michelle Rowland MP, for the opportunity to provide input into this very important work. We look forward to the Government's response to this Final Report.

<sup>1</sup> [Review into the Optus outage of 8 November 2023 - Government Response](#)

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## Acronyms and abbreviations

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<b>ACCAN</b>	Australian Communications Consumer Action Network
<b>ACMA</b>	Australian Communications and Media Authority
<b>DITRDCA</b>	The Department of Infrastructure, Transport, Regional Development, Communications and the Arts
<b>ECP</b>	Emergency Call Person
<b>ESOs</b>	Emergency Service Organisations
<b>NBN</b>	National Broadband Network
<b>NECWG</b>	National Emergency Communications Working Group
<b>NEMA</b>	National Emergency Management Agency
<b>TIO</b>	Telecommunications Industry Ombudsman
<b>TZCC</b>	Triple Zero Coordination Committee

## 1. The views of the Steering Committee

The Steering Committee met monthly between May and October 2024 and was attended by representatives across the Triple Zero ecosystem, including:

- the telecommunications industry
- the ECP
- ESOs
- ACCAN
- ACMA
- DITRDCA.

A full list of members is outlined in **Appendix B**.

The Steering Committee's work was also informed by presentations from s47F and s47F from NEMA.

This section provides an overview of the discussions held by the Steering Committee members in developing the model for the Custodian.

Detailed feedback, and how it was addressed in the final model, is outlined in **Appendix C**.

### 1.1 The need for a Custodian

Recommendation 2 of the Bean Review recommended that Government:

*Establish a Triple Zero custodian, with oversight of and overarching responsibility for the efficient functioning of the Triple Zero ecosystem, including monitoring the end-to-end performance of the ecosystem.*

*There are a number of ways this could be achieved, including by establishing a new body or enhancing the role of an existing body. It would not be a regulatory function: where matters were identified for change, existing bodies would be responsible for implementation.*

There was strong agreement from the Steering Committee on the need to establish the Custodian. Currently there is no entity or person who has overarching visibility of how all the pieces of the Triple Zero ecosystem are functioning. This means that there is no one adequately equipped to identify issues either during or outside of events, and authoritatively direct parties to take action to remediate these issues. This was seen as a weakness and risk to the effective operation of the Triple Zero call service.

Further, Steering Committee members strongly felt that the Triple Zero ecosystem would benefit from a Custodian function that would support and promote the continuous improvement and advancement of the Triple Zero call service.

The development of the Custodian should also be considered in the context of work currently underway, for example work being undertaken by cross-sector working groups already in place support the Triple Zero ecosystem<sup>1</sup> and implementation of the other recommendations of the Bean Review.

<sup>1</sup> Including the work of NECWG (which focuses on operational matters) and TZCC (which focuses on national policy direction discussion on the end-to-end delivery of Triple Zero).

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Members also discussed the current complexity of the Triple Zero ecosystem, which crosses over numerous sectors, and involves State, Territory and Commonwealth jurisdictions (and relevant Ministers). The addition of the Custodian should provide benefits in terms of a cohesive end to end system, rather than add additional complexities.

Noting this, members discussed the need for a clear scope for the Custodian, to prevent overlap and confusion with the remit and responsibilities of other stakeholders in the ecosystem.

## 1.2 A clear objective and functions

The Steering Committee supported a broad overarching objective for the Custodian, as outlined in section 2.1.

Members were of the view that the Custodian should not be a purely operational role, and that it should provide strategic leadership in improving the Triple Zero ecosystem.

In discussions with the Steering Committee, there was agreement that the Custodian must:

- have visibility over the entire Triple Zero ecosystem to identify and support remediation of issues
- have a role not just during Triple Zero disruption events, but at all times to help mitigate the risk of Triple Zero disruptions and ensure that all parties are prepared to respond in the event of a disruption
- have 24/7/365 capability, to ensure that it can respond to major Triple Zero outage events as needed
- identify and advise government on strategic opportunities to improve and progress the Triple Zero call service, including opportunities that are not related to outages
- oversee implementation of reviews relating to Triple Zero improvements or overseeing implementation of learnings following an event
- establish and maintain relationships across the various stakeholders across the Triple Zero ecosystem and government (including NEMA and the DITRDCA), participate in relevant working groups and committees, and engage with agencies outside of the Triple Zero ecosystem as needed
- support the efficient flow of information between affected ESOs, the ECP and carriers
- assist an affected carrier to coordinate and prioritise actions in initial hours of an outage to ensure ongoing provision of the Triple Zero Emergency Call Service
- offer remediation advice based on experience with similar incidents.

**Section 2.2** provides a comprehensive list of functions supported by the Steering Committee.

To ensure clarity of scope, the Steering Committee identified matters that would be clearly outside of the remit of the Custodian and currently within the responsibility of other organisations. This included communications directly to the public during an outage event, operational matters clearly within the scope of existing organisations, and regulatory and rulemaking functions.

While the Steering Committee agreed that public communications should be outside of the scope of the Custodian, they saw the Custodian as having a role in the repository of information, and supporting an efficient flow of information between ESOs, the ECP and carriers (in both upstream

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and downstream directions). This should support improved efficiency and accuracy of information being shared during an outage event.

### 1.3 Utilising an existing body

The Steering Committee considered whether a new body or organisation would need to be established for the Custodian functions or if that function can sit within an existing body. The final model presented recommends that the Custodian function be housed in an existing Commonwealth entity, with the appropriate entity being a decision for Government.

There is no existing body or organisation that is the perfect fit for the objectives, functions and powers of the Custodian. However, a new body was not recommended. There are already numerous stakeholders within the Triple Zero ecosystem, and existing expertise. Utilising an existing body was supported as:

- it is more efficient to setup when compared to a new body
- depending on the body chosen, it can utilise existing expertise and relationships to undertake the Custodian functions
- it limits complexity by not adding another body into the already complex Triple Zero ecosystem.

An existing body could undertake the proposed functions of the Custodian, subject to appropriate resourcing (including adding additional expertise) and appropriate powers.

To undertake its functions, the Custodian must have (or can build up):

- expertise and understanding of the Triple Zero ecosystem
- expertise and understanding of telco regulation and legislative frameworks
- relationships across the Triple Zero ecosystem (including Carriage Service Providers (CSPs), as well as carriers)
- independence from the ESOs, carriers and the ECP
- 24/7/365 capability

The Steering Committee considered the following bodies for the Custodian:

- ACMA
- The ECP
- DITRDCA
- NEMA

The ACMA and the ECP were not supported by the Steering Committee. The Bean Review noted that the Custodian is not a regulatory role, and members agreed. Members also agreed that the Custodian must be independent from the ESOs, carriers and the ECP, and as a result housing the Custodian within the ECP was not supported.

Most members supported NEMA due to its 24/7/365 capability and emergency expertise. If this option is chosen by Government, NEMA would require appropriate resourcing and the building of expertise in areas such as telco policy and regulation.

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While there was general support for NEMA, a number of limitations were also identified, including that Commonwealth responsibility for NEMA resides with a different Minister (than the Minister for Communications) with a different legislative remit and this would add some complexity to governance arrangements. Noting this, rather than establishing the Custodian function within NEMA, Government could consider how to leverage NEMA's existing capabilities and 24/7/365 operations to support the Custodian function.

The Chair of the Steering Committee met with NEMA on 8 October 2024 and 1 November 2024. On 7 November 2024 NEMA provided the following advice in response to the then draft Triple Zero Custodian Model:

- The National Situation Room may be able to assume 24/7 operational functions of the Triple Zero Custodian, subject to funding.
- Non-operational functions of the Custodian could be held by the DITRDCA.
- A future National Public Safety Mobile Broadband Entity (NPE) (should it be approved by Government) could assume the Custodian functions.
- If NEMA were to take on the operational role of the Custodian, there may be a requirement to amend regulations to list NEMA as an agency that can request or direct action of the telcos in relation to Triple Zero Emergency Call Service, or a streamlined approach for DITRDCA to request or direct action for NEMA.

The final advice by NEMA dated 7 November 2024 was provided after the Steering Committee's final meeting and therefore was not discussed in detail by members and will require further consideration. Consideration of the functions of the NPE (a body to oversee and manage the delivery of a service) against the Custodian (oversight and improvement of service capability and coordination of responses to outages) may be needed.

While NEMA's feedback was not discussed in a Steering Committee meeting, in providing feedback on this report, some members noted the need for the Custodian function to maintain a level of independence from the current responsibilities of DITRDCA. DITRDCA noted that the prospect of any future conflict is unlikely, given the objectives of both DITRDCA and the Custodian will be highly aligned.

Steering Committee members did discuss that, wherever the Custodian function sits, Government must consider the overarching objective and functions as outlined in this report as part of any assessment and decision making. This may require further consultation by Government with NEMA and relevant Triple Zero stakeholders.

The need for a clearly defined scope and resourcing was also discussed by the Steering Committee. The Steering Committee recommends that the "Office of the Triple Zero Custodian" be established within an existing body, in order to ensure that the Custodian function is appropriately resourced and distinct from the other functions of the chosen body.

## 1.4 Strategic planning and reporting to Government

Members of the Steering Committee highlighted the need for the Custodian to undertake strategic planning and report on the outcomes of these plans to Government. This approach would be vital to the success of the Custodian in fulfilling its functions and providing transparency of its activities



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to Government. This is an operational matter for the Government and Custodian to consider and is not outlined in the model.

## 1.5 The Custodian in action – scenario testing

The Steering Committee applied the model to case studies to test whether the model was fit for purpose. The model was found to be fit for purpose and compatible with several distinct scenarios, as outlined below.

### Business as Usual (BAU), as presented by DITRDCA

Members discussed the need for the Custodian to have a role in ensuring BAU processes are intact, and stress tested across the Triple Zero ecosystem.

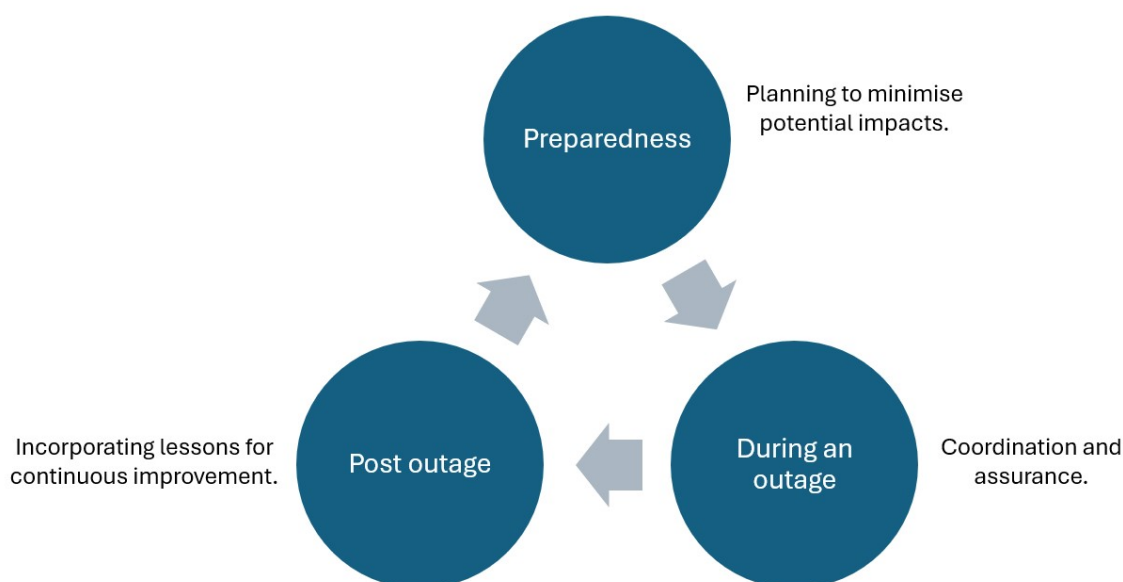
### Update in new technology, system updates or new service which interacts with Triple Zero, as presented by Triple Zero Victoria

Members discussed the Custodian's role to organise the Triple Zero ecosystem in preparation for updates in technology or new services, which interact with Triple Zero.

Members suggested the Custodian could lead a united group to encourage other stakeholders to configure technology and services in a way that works with the ecosystem. Government could also direct these stakeholders.

As part of this scenario, Triple Zero Victoria discussed the Custodian's role in ensuring that the Triple Zero ecosystem is constantly prepared for an unplanned fault, particularly with new technology or system updates.

Figure 1: Triple Zero Victoria - Role of the Custodian across multiple phases of an outage



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**Figure 1** provided by Triple Zero Victoria outlined the Custodian's role in Triple Zero policy and national preparedness activities before, during and after outage events:

- **Preparedness:** ensuring regular testing and exercises, maintaining contact details, and sharing relevant information in emergency management committees.
- **During an outage:** observe and coordinate activities with subject matter expertise, that is currently only undertaken after the fact on an ad hoc basis.
- **Incorporate lessons for continuous improvements:** post the outage, share insights after having holistic oversight and continuous assurance function.

### Significant outages, as presented by the ECP with Optus

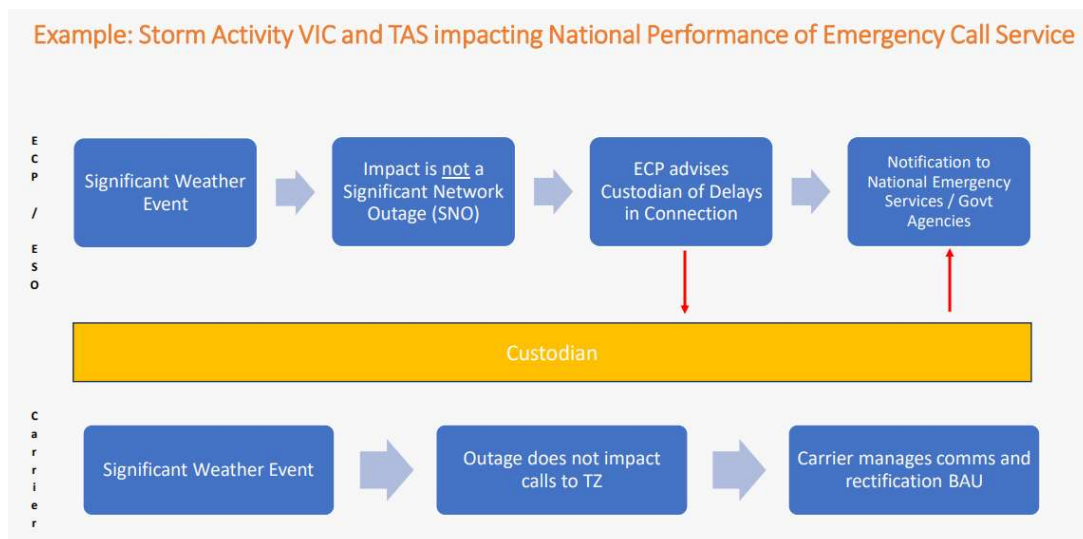
The ECP presented with Optus on two different outage scenarios across different jurisdictions.

It is important that the model supports a clear communications role for the Custodian, as distinct from other stakeholders during an event. External communications with consumers and the broader public are not the role of the Custodian. However, the Custodian does have a role in supporting coordinated and consistent communication across the stakeholders in the Triple Zero ecosystem, as demonstrated by Figures 2 and 3. For example, during an event the Custodian would be responsible for:

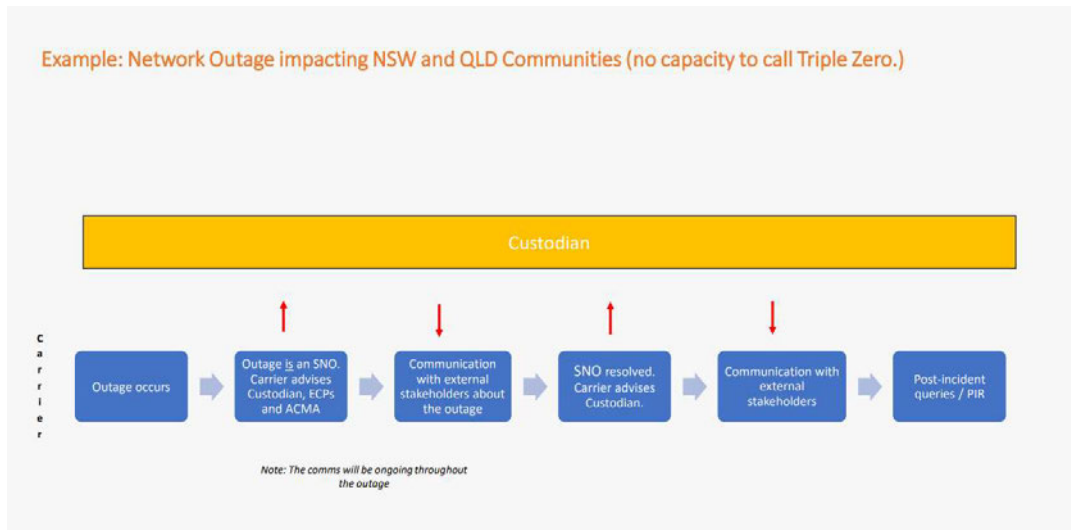
- determining whether a Partner Bridge is required (or other method of information sharing)
- respond to a request from parties to establish a Partner Bridge
- setting up a Partner Bridge
- acting as a source of information for Government entities on the outage.

Under these scenarios, carriers notify the Custodian and other entities it is tasked or required under obligations to notify.

**Figures 2 & 3: The ECP and Optus – Role of the Custodian during storm activity impacting the Emergency Call Service**



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## 2. Recommended Triple Zero Custodian Model

### 2.1 Overarching Objective

*To perform its functions to support the effective and continued operation, improvement, and advancement of the Triple Zero Emergency Call Service.*

### 2.2 Functions

The functions of the Triple Zero Custodian are:

- a. support ESOs, the ECP, carriers and CSPs to ensure the effective operation and ongoing improvement of the Triple Zero Emergency Call Service
- b. require information (either during an outage event or at other times) from carriers, the ECP, and ESOs to determine if actions are required to support the effective functioning of the Triple Zero Emergency Call Service
- c. require information and instruct the ECP and carriers (or any other parties in the ecosystem) to undertake action as necessary to support the functionality of the Triple Zero Call Service (subject to the exclusion of operational matters outlined below)
- d. facilitate and coordinate the timely sharing of information during a Triple Zero outage between CSPs, carriers, the ECP, ESOs and government agencies (e.g. NEMA)
- e. support the effective, timely and accurate flow of information during a Triple Zero outage event<sup>1</sup>, oversee and maintain a central hub of information regarding the Triple Zero ecosystem
- f. require testing and exercises of Triple Zero Emergency Call Service with the co-operation of CSPs, carriers, the ECP, and ESOs (there should be the ability for government to mandate a schedule of testing and for the Custodian to perform testing as needed)
- g. require reporting of outcomes from tests and exercises of Triple Zero Emergency Call Service, outlined in 2.2(f)
- h. identify risks to the Triple Zero Emergency Call Service and take action to mitigate risks where necessary within the scope of the Custodian's powers and functions
- i. provide timely and accurate information to the ACMA and Commonwealth Government on matters relating to the Custodian's functions and continued operation and advancement of the Triple Zero ecosystem
- j. report risks (and any planned mitigation activities) to carriers, CSPs, ESOs, the ECP, ACMA and Commonwealth Government as needed
- k. reporting on outcomes of scheduled tests and exercises to ACMA and the Commonwealth Government
- l. undertake inquiries and reviews relating to the Triple Zero Call Service as needed or directed by government

<sup>1</sup> For the purposes of the Custodian's functions, a Triple Zero outage event is any outage that impacts on the function of Triple Zero.

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- m. where required, lead or oversee implementation of outcomes and recommendations from reviews and enquiries relating to the operation and improvement of the Triple Zero Call Service
- n. either during or outside of outage events, liaise with other state or Commonwealth emergency coordination agencies/mechanisms or other industry sectors
- o. any other function as conferred by government or necessary to achieve the overarching objective of the Custodian.

The Custodian's functions will not extend to:

- a. communications with the public, media and community during an outage event (unless that function already exists), although the Custodian's role under functions (e) and (i) will support overall improved communication within the Triple Zero ecosystem during an event.
- b. providing operational directions and advice to the ECP, carriers and ESOs on how to restore the Triple Zero Emergency Call Service, related outage event or network operations
- c. overseeing compliance with regulatory obligations
- d. making rules or laws (unless the Custodian is established within the scope of a rule making body, like ACMA or government, in which case the functions would be treated separately).

## 2.3 Governance Framework

The Custodian will be established via Commonwealth legislation and supported by the Office of the Triple Zero Custodian. The Commonwealth Government will have the power to appoint, reappoint, suspend, or terminate the Custodian.

The functions of the Custodian (as detailed above) will be specified in the regulatory framework for the Custodian.

The Office of the Triple Zero Custodian will be supported by staff, in a structure to be determined by Government depending on the final functions and form. The Custodian may delegate any function or power to any person or class of persons to ensure 24/7/365 capability.

The Custodian and the Office of the Triple Zero Custodian will be responsible and accountable to the Commonwealth Government.

### Setup of the Custodian within an existing Commonwealth entity

The Office of the Triple Zero Custodian will be established within an already existing Commonwealth entity to ensure that it can commence operations efficiently and effectively.

The Steering Committee prefers that the Office of the Triple Zero Custodian sit within NEMA due to NEMA's operational expertise and 24/7/365 capability.

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**Powers**

To fulfil its objectives and undertake the above functions, the Custodian will have the power to:

- a. do all things that are necessary or convenient to be done, or in connection with, or incidental to, the performance of its functions
- b. require information from specified entities (such as the ECP, ESOs and carriers) relating to the function of the Triple Zero Call Service or for the purposes of performing its specified functions
- c. specify the timeframes for the provision of information, which can be subject to extensions granted by the Custodian on request
- d. hold and share information relating to the function of the Triple Zero Call Service
- e. require cooperation with processes related to its functions, such as instructions to the ECP and carriers to undertake action as necessary.

As part of the implementation of the Custodian's legal architecture the Government should consider how to ensure that the relevant stakeholders in the Triple Zero ecosystem can be required to cooperate with the Office of the Triple Zero Custodian. For example, the Government could impose an obligation on participants within the ecosystem to co-operate with the Custodian, which could be enforced by the ACMA.

Government will need to consider any potential legal issues with the Commonwealth Government seeking to impose obligations on state and territory government agencies.

In exercising the above powers (particularly b. and e.) the Custodian must take into account any legal or regulatory obligations that the entities are required to fulfil.

Government should also consider whether there is a need to create a "regulatory safe harbour" to support cooperation with the Custodian, especially during an incident.

**2.4 Independent Review**

The effectiveness of the Custodian will be subject to a once-off review, 12 months after its establishment. This review should be conducted by an independent entity with a final report provided to the relevant Minister.

The review will be informed by discussions with key stakeholders regarding the effectiveness of the Custodian in undertaking its functions, and whether the functions are appropriate and support the continued operation and improvement of the Triple Zero call service.

The Government could utilise existing groups for engagement on the Custodian, either in relation to its implementation or as part of the independent review process.

## Appendix A: Triple Zero Custodian Steering Committee Terms of Reference

The TIO will establish a steering committee which will consider how best to establish a Triple Zero Custodian (entity).

The Custodian will have oversight of and overarching responsibility for the efficient functioning of the Triple Zero communications ecosystem, through monitoring the end-to-end performance of the ecosystem.

Specific matters for consideration for the committee will be:

1. The role and functions of the entity and its scope of operations, including:
  - a. during crisis situations,
  - b. during non-crisis situations,
  - c. mechanisms for mutual assistance between carriers, including communication with Emergency Services Operators (ESOs) and the Emergency Call Person (ECP),
  - d. oversight of end-to-end testing
  - e. oversight of processes and procedures between telecommunications providers, the ECP and ESOs.
2. The authority of the entity
3. Whether a new body should be established or the role of an existing body or bodies be enhanced or augmented?

### Chair

The Committee will be chaired by the TIO and supported by staff from DITRDCA.

### Membership

The committee should be made of representatives from the telecommunications industry, a representative of the Emergency Call Person, a representative of Emergency Service Organisations, a representative of the ACMA, a representative from the Australian Communications Consumer Action Network and a representative of the Department of Infrastructure, Transport, Regional Development, Communications and the Arts.

The TIO may invite people with specialist knowledge or expertise to present to the committee on relevant topics.

### Meetings

The committee will meet monthly.

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**Reporting**

The TIO will provide monthly updates to the Minister for Communications on the deliberations of the committee, with a final report to be provided to the Minister on or before 29 November.



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## Appendix B: Triple Zero Custodian Steering Committee Membership

### Steering Committee Members

Representative	Name	Organisation
Chair	s47F	TIO
Secretariat support	s47F	TIO
	s47F	TIO
Telecommunications Industry	s47F	TPG Telecom
	s47F	Optus
	s47F	Telstra
	s47F	NBNco
Emergency Call Person	s47F	Telstra
Emergency Services Organisations	s47F	NECWG & QLD police
	s47F	NECWG & NSW Police
	s47F	Triple Zero Victoria
	s47F	Triple Zero Victoria
ACMA	s47F	ACMA
	s47F	ACMA
ACCAN	s47F	ACCAN
	s47F	ACCAN
Department of Infrastructure, Transport, Regional Development, Communications, and the Arts	Sam Grunhard	Department
	Kathleen Silleri	Department

### Guest attendees

Representative	Name	Meeting attended
Independent Reviewer	Richard Bean	23 May 2024
NEMA	Christopher Fields	25 June 2024

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## Appendix C: Summary of feedback from the Steering Committee

Feedback	Response
The Custodian could have oversight of work to prepare for possible Triple Zero outages, including overseeing implementation of outcomes from enquiries and reviews to support the continued improvement and advancement of Triple Zero.	Addressed in following function: <i>where required, lead or oversee implementation of outcomes and recommendations from reviews and enquiries relating to the operation and improvement of the Triple Zero Call Service</i>
The Custodian should have relationships across the Triple Zero ecosystem and attend relevant Committees and Working Groups.	Covered in functions under 2(h).
The Custodian should oversee and direct parties to undertake testing, but not be required to undertake the testing themselves.	Noted and reflected in the model under 2(g) and (k).
It should be clear that the Custodian's functions relate to any outage that impacts Triple Zero.	Noted and reflected under 2(e).
The model must capture the need for strategic leadership. It is not a purely an operational role.	Noted and reflected in Final Report.
The Custodian should be responsible for setting up the partner bridges to address a current gap.	Noted. It is intended that the functions capture this.
Powers should be broad.	A broad power has been included: <i>to do all things that are necessary or convenient to be done, or in connection with, or incidental to, the performance of its functions</i>
If there was a cyber nexus (or indeed a major natural disaster nexus) the Custodian would need to interface with other government coordination mechanisms.	Covered by the 2(n) and (o).
There may need to be thinking about how the powers are operationalised. It is important that the Custodian is meeting its operational and strategic plans.	Agree that this is important, and the importance of strategy and reporting is reflected in the Final Report.
Support 24/7 capability	Noted and reflected in the Final Report.
ECP role not supported due to current role and potential conflict of interest.	Noted. Proposed new draft model does not provide for the ECP taking on this role.

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NEMA has operational capabilities and understands flow on to other sectors in an emergency event.	Views reflected in Final report. Recommended model provides for establishment of a Custodian within an existing body (which could be NEMA).
The Custodian needs a clear role in supporting efficient communications between ESOs and carriers.	The Custodian's role under functions 2(e) and (h) will support overall improved communication within the Triple Zero ecosystem during an event