

s22(1)(a)(ii)

**From:** s47F <s47F@team.telstra.com>  
**Sent:** Monday, 20 October 2025 2:30 PM  
**To:** s47F; s47F; Grunhard, Samuel; s47F; s47F; Cathy Rainsford; s47F  
**Subject:** RE: Devices briefing  
**Attachments:** Samsung and TPG Camp-on pre November 2021 devices.pdf

Hi all,

Thank you very much for your time just now. Please see attached the slide deck as we presented.

One point of clarification – the communication that we would need to start tomorrow relates to the 27,000 customers, for which there is no firmware fix.

Thank you.

s47F

s47F  
 Head of Government Relations  
 Telstra Group Limited

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 W: [www.telstra.com](http://www.telstra.com)



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General

-----Original Appointment-----

**From:** s47F  
**Sent:** Monday, 20 October 2025 11:44 AM  
**To:** s47F; barnaby.kerdel@aph.gov.au; s22(1)(a)(ii); s47F; s47F; Grunhard, Samuel; s47F; s47F  
**Cc:** Cathy Rainsford; s22(1)(a)(ii)  
**Subject:** Devices briefing  
**When:** Monday, 20 October 2025 1:30 PM-2:00 PM (UTC+10:00) Canberra, Melbourne, Sydney.  
**Where:** Microsoft Teams Meeting

Hi all,

As discussed, setting some time up for a briefing this afternoon on the Triple Zero calling devices issue.

Thank you.

s47F

---

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# Samsung and TPG Camp-On Pre Nov 2021 devices

Confidential briefing 20 October 2025

# Normal Operation (not including Camp-On)

- Networks are identified by the Public Land Mobile Network (PLMN) Code sent on the Radio Frequency (RF) signals.
- If the PLMN Code on the RF Signal matches the SIM Card settings, the Mobile Device knows it is on the “Home” Network and applies the Carrier and SIM card settings
- It is now known that TPG had settings that forced (some) Samsung devices to only use 3G for 000 calling when the Mobile with a TPG SIM card was on the TPG network. This is because through until July 2021, TPG did not support emergency calling over 4G.
- These same devices operating on the Telstra or Optus network successfully make 000 calls on 4G.

PLMN  
505 01 = Telstra  
505 02 = Optus  
505 03 = TPG





# Issue and Finding

## Issue

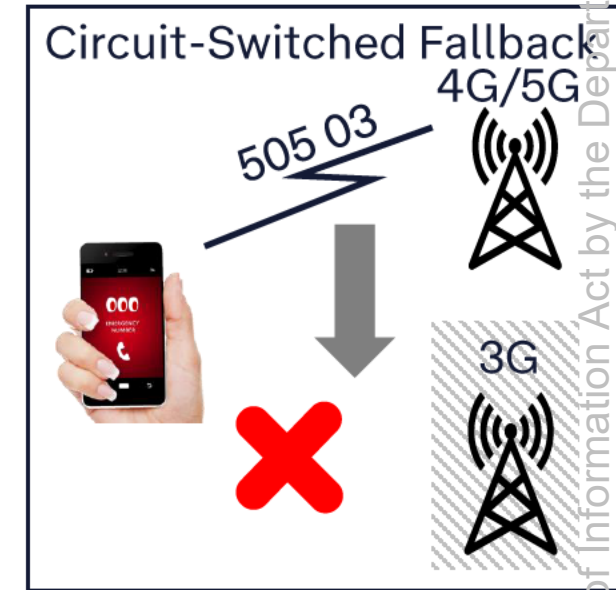
- We became aware a Samsung J2 device experienced a 000 call failure on TPG's network (with a TPG SIM Card).

## Investigation

- Telstra proactively initiated extensive testing to confirm operation of Samsung J2 with a Telstra SIM Card on the TPG Network.

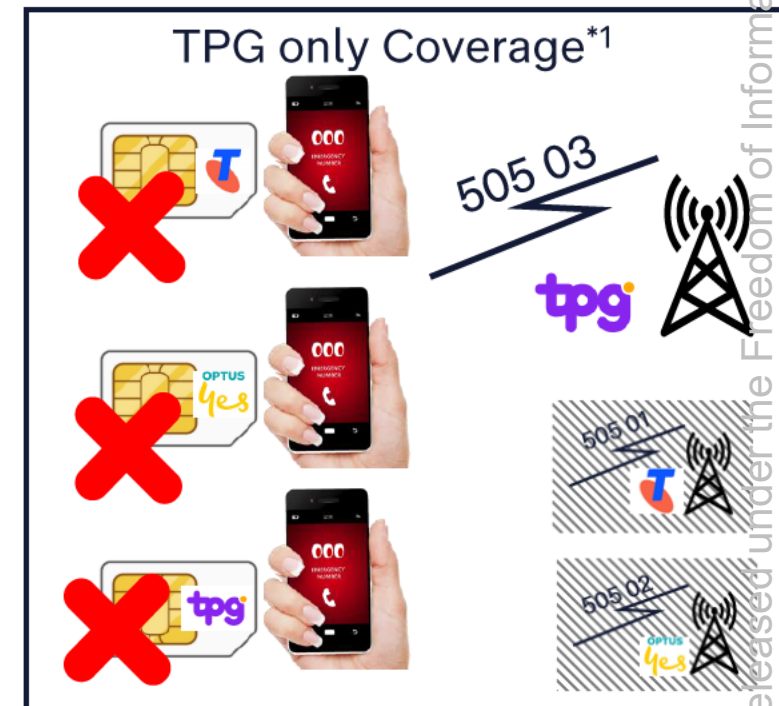
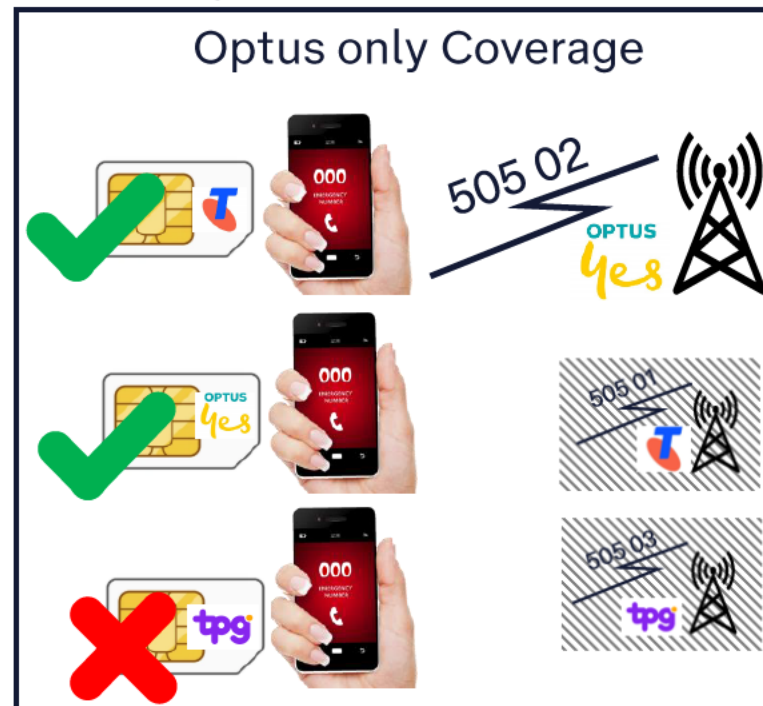
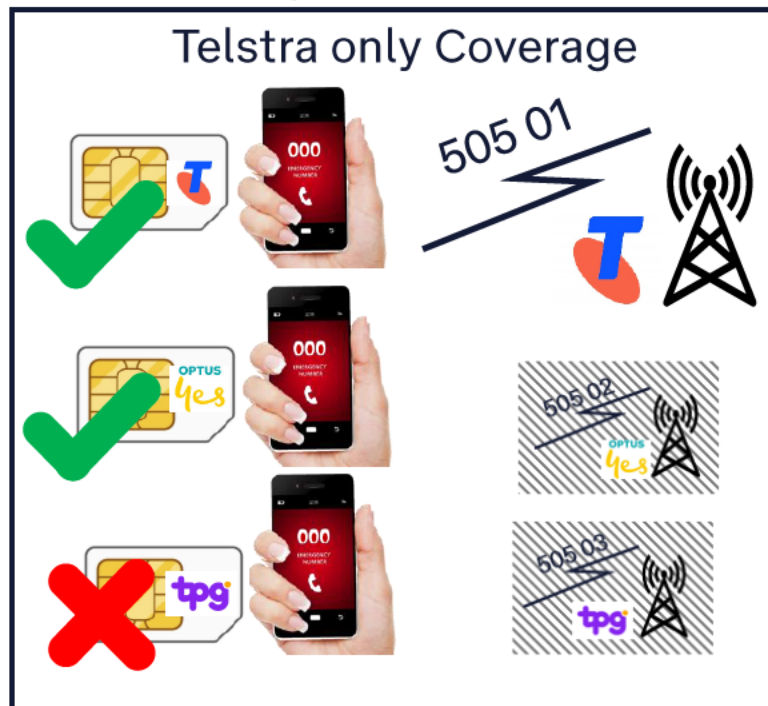
## Finding

- 000 Calls were failing when attempting to use the TPG network on a Samsung device, *even with a Telstra SIM Card*.
- Samsung has since confirmed that Software/Firmware of all devices (pre - November 2021) are coded so that whenever the TPG PLMN code is seen (505 03), 000 calls are forced to perform a "Circuit Switched Fallback" operation which requires a 3G network to be available. Because there is no 3G network, the 000 call fails.
- We have also become aware that TPG directed Samsung to implement the forced use of 3G for 000 calling when on TPG's network.
- This forced behavior, because it is in the software/firmware, ignores/overrides all Carrier and SIM card settings.



# Impact

- All Samsung Devices released prior to November 2021 have in their software/firmware the forced operation for 000 calls whenever the device sees TPG's PLMN Code, regardless of the SIM card inserted and carrier setting loaded.
- We are waiting on Samsung to advise which Device Models and Software/Firmware versions are impacted.
- To resolve, a Software/Firmware update is required (supplied by Samsung). However, not all impacted devices can be upgraded. For devices that can be upgraded, a Software/Firmware version exists to resolve the issue.









# Annexure



s22(1)(a)(ii)

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>  
**Sent:** Monday, 20 October 2025 2:47 PM  
**To:** s22(1)(a)(ii); Silleri, Kathleen; s22(1)(a)(ii); s22(1)(a)(ii); s22(1)(a)(ii)  
**Subject:** FW: Devices briefing [SEC=OFFICIAL]  
**Attachments:** Samsung and TPG Camp-on pre November 2021 devices.pdf

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Hi all,

I was asked to attend this meeting to take some notes for Sam.

I think the slides do a pretty good job at capturing the conversation. A few additional points are as follows:

- s47G(1)(a), s47G(1)(b)
- On reflection, when I was typing up my notes, s47G(1)(a), s47G(1)(b)
- s47G(1)(a), s47G(1)(b)  
 The issue has existed since TPG shutdown it's 3G network – so how could they have just done nothing to act on this given they must have known?
- Cathy Rainsford jumped into action to brief the Authority on Telstra's ask re: an extension to blocking to help upgrade customers (noting they'd be telling them with every call of the risks etc.). She was going to call TPG and Optus as well.
- Apparently TPG have blocked 6000 devices in the last two weeks and have another 2000 due shortly.

Lastly, Sam asked if we could record this in our 'Triple Zero Outage log' – either as a standalone or connected to the Wentworth Falls incident. He was pleased to hear we already have been giving 'case numbers'. Could we save this presso in our outages folder structure somewhere (probably another thing we need to think about rejigging!).

Cheers,

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**Sent:** Monday, 20 October 2025 2:30 PM  
**To:** s47F <s47F@team.telstra.com>; s47F <s47F@team.telstra.com>; Grunhard, Samuel <Samuel.Grunhard@COMMUNICATIONS.gov.au>; s47F <s47F@team.telstra.com>; Cathy Rainsford <cathy.rainsford@acma.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>  
**Subject:** RE: Devices briefing

Hi all,



Thank you very much for your time just now. Please see attached the slide deck as we presented.

One point of clarification – the communication that we would need to start tomorrow relates to the 27,000 customers, for which there is no firmware fix.

Thank you.

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-----Original Appointment-----

**From:** s47F  
**Sent:** Monday, 20 October 2025 11:44 AM  
**To:** s47F; [barnaby.kerdel@s22\(1\)\(a\)\(ii\)](mailto:barnaby.kerdel@s22(1)(a)(ii)); s22(1)(a)(ii); s47F; s47F; Grunhard, Samuel; s47F; s47F  
**Cc:** Cathy Rainsford; s22(1)(a)(ii)  
**Subject:** Devices briefing  
**When:** Monday, 20 October 2025 1:30 PM-2:00 PM (UTC+10:00) Canberra, Melbourne, Sydney.  
**Where:** Microsoft Teams Meeting

Hi all,

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**From:** Grunhard, Samuel <Samuel.Grunhard@COMMUNICATIONS.gov.au>  
**Sent:** Tuesday, 21 October 2025 5:23 PM  
**To:** CHAPPLE, Clare  
**Subject:** FW: FYI - Samsung device issue - Authority decision on forbearance for Telstra and Optus [SEC=OFFICIAL]

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FYV (FWIW)

**Sam Grunhard**

First Assistant Secretary

Communications Services and Consumer Division

Communications and Media Group

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 I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.*

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**From:** Cathy Rainsford <Cathy.Rainsford@acma.gov.au>  
**Sent:** Tuesday, 21 October 2025 5:14 PM  
**To:** Grunhard, Samuel <Samuel.Grunhard@COMMUNICATIONS.gov.au>; barnaby.kerdel@aph.gov.au; s22(1)(a)(ii) [infrastructure.gov.au](mailto:s22(1)(a)(ii)@infrastructure.gov.au)  
**Cc:** s22(1)(a)(ii) <s22(1)(a)(ii)@mo.communications.gov.au>; Silleri, Kathleen <Kathleen.Silleri@infrastructure.gov.au>; Elizabeth Quinn <elizabeth.quinn@acma.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@acma.gov.au>  
**Subject:** FYI - Samsung device issue - Authority decision on forbearance for Telstra and Optus [SEC=OFFICIAL]

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## OFFICIAL

Colleagues,

Further to yesterday's briefing from Telstra and follow-up discussions I had with Telstra, Optus and TPG, the Authority has today considered a request from Telstra and Optus for a period of forbearance.

By way of reminder in what I hope is plain English terms, the recently identified problem is that certain Samsung devices have been hard coded in such a way that if the user tried to call triple zero, and it is looking for the TPG mobile network, the call would not get through. This is because the hard coding forces the device to look for a TPG 3G network. There is a firmware/software upgrade which overrides this hard coding, but whether that has been downloaded by each user with these devices is an unknown at the moment. A subset of devices are known to be too old to be able to accommodate the upgrade.

TPG has been and is moving to block these devices for their customers, as they say, consistent with their obligations under the Telco (Emergency Call Services) Determination 2019. We will be checking for their compliance.

For Telstra and Optus customers with these devices, the risk profile is a bit different to TPG's customers. For it to materialise for Telstra and Optus customers, when the user calls triple zero, both the Telstra or Optus networks would need to be down and TPG's network would need to be the only one working. This occurs because the first point of call for any triple zero call is the customer's home network and it is only if this is down that the camp-on arrangements kick in.

Telstra and Optus are moving to block the devices for the respective sub-set of their customers who are known to have devices which are of an age that the firmware/software upgrade would not work.

Today, the Authority has granted a small period of forbearance to Telstra and Optus until 9 November to allow for them to better identify how many other customers have these devices, and what solutions they could implement (or support the customer to implement) that would address the triple zero issue and avoid potentially large numbers of customers having to buy new devices where a firmware/software upgrade would resolve the issue. The forbearance is dependent upon Telstra and Optus having a plan to the ACMA by 28 October setting out the preferred solution and customer engagement strategy, following which we will assess whether any further forbearance needs to be considered when there is more solid information to hand.

I expect we will get some media inquiries in due course, and we will prepare for those. Naturally, as this was a decision of the Authority, I'd expect any media inquiries to be referred to us.

Please let me know if you have any questions.

Regards  
Cath

**Cathy Rainsford**  
General Manager Consumer Division

Australian Communications and Media Authority  
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*strength and commitment of Aboriginal and Torres Strait Islander peoples to the land, waters and their communities. We pay our respects to Elders past and present.*



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**From:** Fogarty, Chris <Chris.Fogarty@INFRASTRUCTURE.gov.au>  
**Sent:** Wednesday, 22 October 2025 12:04 PM  
**To:** s22(1)(a)(ii) s22(1)(a)(ii) s22(1)(a)(ii) s22(1)(a)(ii) s22(1)(a)(ii) s22(1)(a)(ii)  
**Subject:** FW: info on device testing [SEC=OFFICIAL]

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FYI – this refers to the article s22(1)(a)(ii) mentioned

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**From:** Grunhard, Samuel <Samuel.Grunhard@COMMUNICATIONS.gov.au>  
**Sent:** Wednesday, 22 October 2025 11:19 AM  
**To:** barnaby.kerdel@aph.gov.au  
**Cc:** CHISHOLM, James <James.CHISHOLM@infrastructure.gov.au>; Silleri, Kathleen <Kathleen.Silleri@infrastructure.gov.au>; CHAPPLE, Clare <Clare.Chapple@infrastructure.gov.au>; Fogarty, Chris <Chris.Fogarty@INFRASTRUCTURE.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@mo.communications.gov.au>  
**Subject:** info on device testing [SEC=OFFICIAL]

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Hi Barnaby,

You asked for some information about today’s CommsDay reporting on device testing.

s47G(1)(a), s47G(1)(b)

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s47G(1)(a), s47G(1)(b)

Sam

**Sam Grunhard**

First Assistant Secretary  
Communications Services and Consumer Division  
Communications and Media Group

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**From:** s47F <s47F@optus.com.au>  
**Sent:** Wednesday, 22 October 2025 2:07 PM  
**To:** Grunhard, Samuel  
**Subject:** RE: Samsung devices

Hi Sam,

s47G(1)(a), s47G(1)(b)

Let me know if you have any other questions.

Thanks,

s47F

s47F

**Senior Director, Government and Public Affairs**

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 1 Lyonpark Road, Macquarie Park NSW 2113 Australia  
 s47F [@optus.com.au](mailto:s47F@optus.com.au)



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**From:** s47F  
**Sent:** Wednesday, 22 October 2025 1:48 PM  
**To:** sam.grunhard@infrastructure.gov.au  
**Subject:** Samsung devices

Hi Sam,

s47G(1)(a), s47G(1)(b)



s47G(1)(a), s47G(1)(b)



There may be further updates, and if so, I will let you know but, in the meantime, please let me know if you have any questions.

Thanks,

s47  
F

s47F

**Senior Director, Government and Public Affairs**

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1 Lyonpark Road, Macquarie Park NSW 2113 Australia

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**From:** s22(1)(a)(ii) <s22(1)(a)(ii)@mo.comunications.gov.au>**Sent:** Friday, 24 October 2025 1:16 PM**To:** Phelps, Ben <Ben.Phelps@communications.gov.au>; Cathy Rainsford <Cathy.Rainsford@acma.gov.au>; CHAPPLE, Clare <Clare.Chapple@infrastructure.gov.au>**Cc:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>; Silleri, Kathleen <Kathleen.Silleri@infrastructure.gov.au>; Fogarty, Chris <Chris.Fogarty@INFRASTRUCTURE.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@mo.comunications.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@mo.comunications.gov.au>**Subject:** RE: Contact details - Acting arrangements [SEC=OFFICIAL]**Importance:** High

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Ben, Clare, Cathy

Can you please fact check these Q&amp;As ASAP and provide updated facts as identified.

**How did this happen?**

When the 3G network was shutdown, industry tested devices and blocked those deemed unable to access Triple Zero, as required by law.

There were estimated to be about 276,000 devices blocked at the time.

Further proactive testing by Telstra identified an additional number of devices that should have been blocked or needed software upgrades.

Once Telstra discovered the issue through its testing, they notified ACMA, Samsung, and other mobile network operators.

ACMA will be looking into why these additional devices were not identified previously.

If telcos have breached their obligations they will face consequences.

If needed:

- The Telecommunications (Emergency Call Service) Amendment Determination 2024 (No. 1) came into effect on 24 October 2024.

- It requires telcos to identify, notify and block a devices from the network as well as give information and assistance to customers to access alternative low cost or no cost mobile phones and/or payment assistance.
- This requirement was not in place for other network shutdowns occurred (e.g. 2G) (what year/s was the 2 G shutdown)

### **Why did it take so long to identify the phones not working?**

ACMA will be looking into why these additional devices were not identified previously.

However, it should be noted that this is a very specific issue impacting a relatively small number of handsets.

We understand it was directly related to a software configuration decision made by TPG/Vodafone some years ago.

All Australian telecommunication companies are required to ensure Triple Zero access.

This includes supporting phones to fall back to other networks for emergency access, when the primary network is not available.

When this can't occur because of the phone itself, and it cannot be fixed, telcos have a regulatory responsibility to identify these phones, communicate with the customer and block the phone from the network, ensuring customers are not left with a false sense of security.

The government has also strengthened requirements for telcos to do more rigorous device testing through delivering Recommendations 3 and 4 of the Bean Review – ACMA has registered the new industry code that requires telcos to provide network equipment and support testing arrangements the Government is delivering through the University of Technology Sydney's (UTS) National Telecommunications Resilience Centre.

This will help ensure non-compliant devices continue to be identified and fixed or blocked if they can't be fixed.

The Australian Communications and Media Authority and the telcos are responsible for device testing, and telcos are responsible for notifying customers impacted.

Anyone impacted should contact their telco for support.

### **When will testing at the University of Technology Sydney begin?**

It will begin next month (is it 1 Nov?)

We expect this testing process, combined with tighter device compliance monitoring, to ensure as much as possible that phones available in Australia are able to call Triple Zero.

Already under existing rules introduced in 2024, telcos must identify mobile phones that are unable to access the emergency call service, notify affected customers and provide assistance to these customers.

This further testing will make sure more device testing is done in a range of scenarios and will ensure the system is better for all users.

### **How many devices have been affected?**

We understand from industry that about xxxx devices are affected – xxx will be able to receive a software update and xxx will need to be replaced This is a relatively small number.

When the 3G network was shut about 276,000 devices had to be blocked.

How many people haven't been able to call Triple Zero because of this issue?

There are

Do telcos need to replace people's phones?

Telcos have a moral responsibility to look after their customers. I know they are working with vulnerable customers directly to offer replacement devices as they should.

Why wasn't this sorted after the 3G shutdown?

This is obviously a concern and ACMA will be looking into why these additional devices were not identified previously, though the initial indication is that this issue has occurred due to a very specific combination of circumstances.

If telcos have breached their obligations they will face consequences.

s22(1)(a)(ii)

Advisor • Office of the Hon Anika Wells MP

Minister for Communications • Minister for Sport • Member for Lilley

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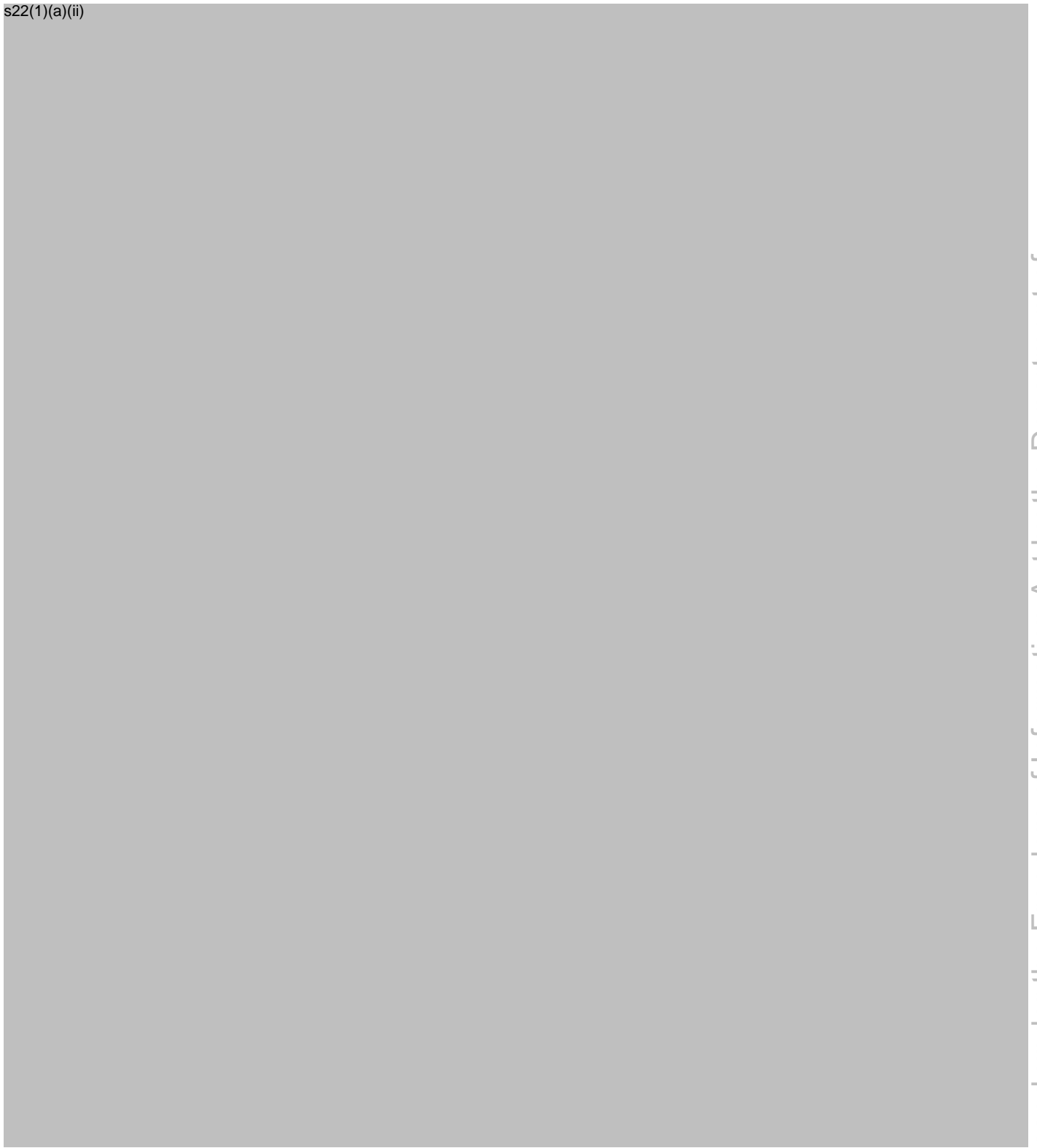
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**To: Minister Wells**

**cc:**

**Subject: MINISTER WELLS MEETING WITH TPG CEO**

<b>Date &amp; Time:</b>	10:30am, Tuesday 28 October 2025
<b>Meeting type &amp; Location:</b>	In person, M1.19, Parliament House, Canberra
<b>Traditional custodians:</b>	Include traditional custodians if not at APH or EO/CPO.
<b>Staffing:</b>	Ministerial office to include.
<b>Intended objective:</b>	Discuss the Triple Zero Optus outage, UOMO readiness, expiring spectrum licences, and infrastructure sharing
<b>Key Attendees:</b>	Mr Iñaki Berroeta, CEO, TPG Telecom s47F, Group Executive Legal & External Affairs, TPG Telecom s47F, Head of Government Relations, TPG Telecom
<b>Stakeholder's objective:</b>	TPG Telecom requested a meeting to discuss expiring spectrum licences, regional connectivity and UOMO legislation, and network resiliency measures.
<b>Media</b>	N/A

**Purpose – why you are attending:**

s22(1)(a)(ii)


- This meeting also provides an opportunity to discuss the matter Telstra raised with your office and the department on 20 October about a TPG-related device issue they have become aware of related to a Triple Zero call failure on TPG's network.

**Key Matters / Issues:**


Samsung handset issue affecting access to Triple Zero

- On Monday 20 October, Mr Sam Grunhard, First Assistant Secretary, Communications Services and Consumer Division, met with representatives from Telstra, the Australian Communications and Media Authority and staff from your office.
- Telstra requested a meeting after it became aware of a device issue related to a Triple Zero call failure on TPG's network from a Samsung J2 device using a TPG SIM card. Further information on the technical aspects of the failure is provided at **Attachment D**.
- Telstra notified your office and the department that it had become aware that TPG had (previously) directed Samsung to implement the forced use of 3G for Triple Zero calling when on TPG's network, and that this was still in place more than 18 months after the shutdown of TPG's 3G network.
- To rectify the situation, all Samsung devices released prior to November 2021 will need a software/firmware update, noting that not all impacted devices can be upgraded.
- Telstra has also asked TPG to consider additional technical solutions. Telstra also requested regulatory forbearance from the ACMA to work through this issue further with customers.


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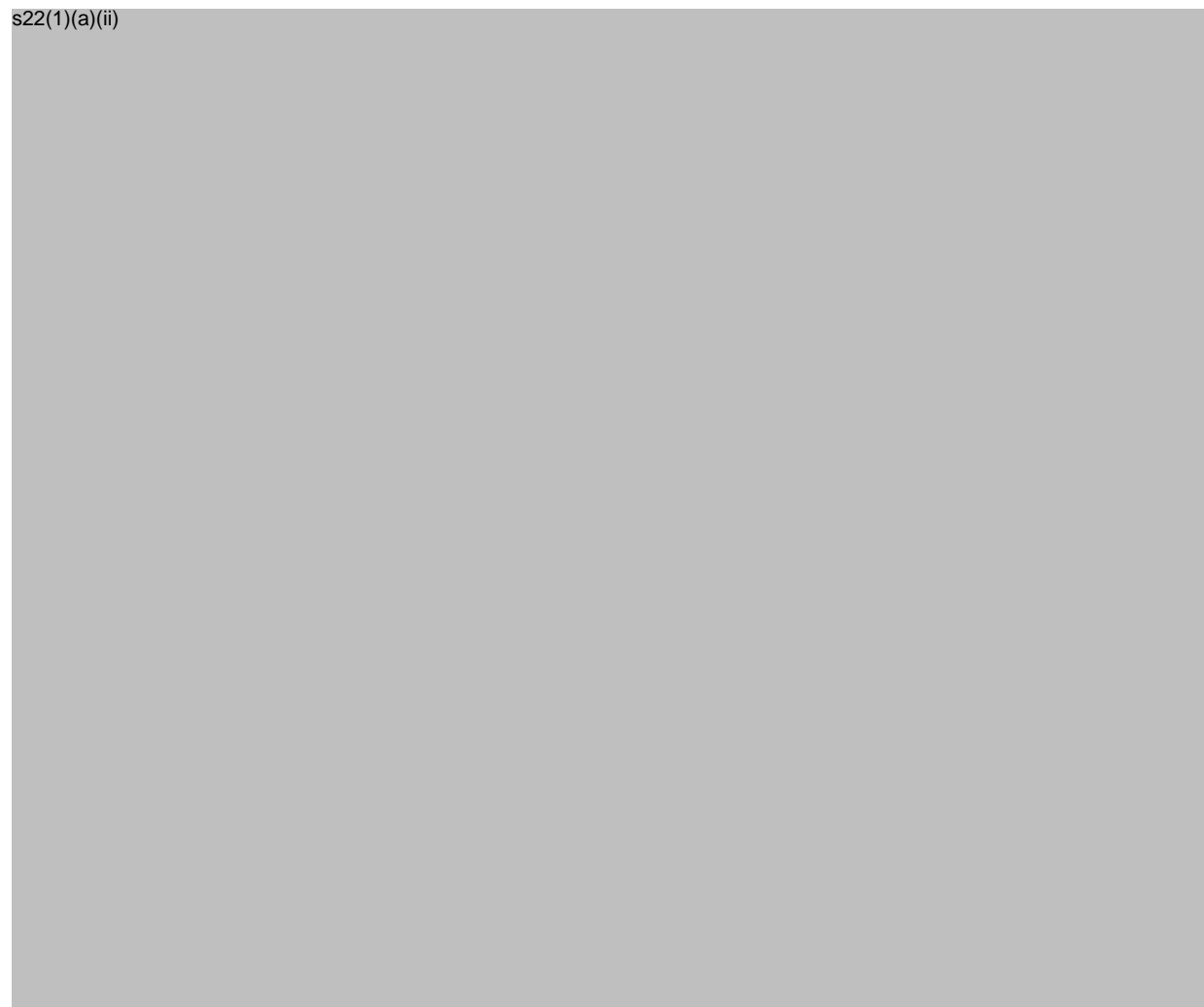
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Name: Ben Phelps  
Position: A/g First Assistant Secretary  
Division: Communications Services and Consumer  
Ph: +61 (2) §22(1)(a)(ii)  
Mob: §22(1)(a)(ii)  
Date Cleared: 24 October 2025


Contact Officer: Kathleen Silleri  
Division: Emergency Communications  
and Resilience Branch  
Mob: §22(1)(a)(ii)

**Attachments:**

- Attachment A: Logistics Summary
- Attachment B: Biographies
- Attachment C: Talking Points
- Attachment D: Samsung and TPG Camp-On Pre Nov 2021 devices

ATTACHMENT B

**BIOGRAPHIES**

	<p>Mr Iñaki Berroeta (online) CEO TPG Telecom Facebook: TPG</p> <p>Mr Berroeta has been CEO at TPG Telecom since September 2014. You most recently met with Mr Berroeta in Canberra on 7 October to discuss the recent Optus Triple Zero outage and preparations for the upcoming 2025-26 high risk weather season.</p>
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## ATTACHMENT C

TALKING POINTSTriple Zero and emergency communications resilience


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- On Monday 20 October, my department was made aware by Telstra of a device issue related to a Triple Zero call failure on TPG's network from a Samsung J2 device using a TPG SIM card.
- I understand this issue could affect a significant number of devices on your network, and expect TPG to work with Samsung and Telstra as the Emergency Call Person to rectify this issue with urgency.
- What is TPG currently doing to address this issue, and when can my department expect an update?

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**How did this happen?**

When the 3G network was shutdown, industry blocked mobile phone devices that would be unable to access Triple Zero, as required by law. That law also requires telcos to block any further devices that would not be able to connect to Triple Zero, irrespective of the reason ie it is a continuing obligation.

There were estimated to be about 276,000 devices blocked at the time.

Further proactive testing by Telstra identified an additional number of Samsung devices that should have been blocked.

Once Telstra discovered the issue through its testing, they notified ACMA, Samsung, and other mobile network operators.

ACMA will be looking into why these additional devices were not identified previously.

If telcos have breached their obligations they will face consequences.

If needed:

- The Telecommunications (Emergency Call Service) Amendment Determination 2024 (No. 1) came into effect on 24 October 2024.
- It requires telcos to block all devices from the network as well as give information and assistance to customers to access alternative low cost or no cost mobile phones and/or payment assistance.
- This requirement was not in place for previous network shutdowns e.g. when our 2G networks were shut down across 2016 and 2017

**Why did it take so long to identify the phones not working?**

ACMA will be looking into why these additional devices were not identified previously.

However, it should be noted that this is a very specific issue impacting a relatively small number of handsets.

We understand it was directly related to a software configuration decision made some years ago to accommodate the fact that Telstra and Optus turned on their 4G networks ahead of TPG/Vodafone.

All Australian telecommunication companies are required to ensure Triple Zero access.

This includes supporting phones to fall back to other networks for emergency access, when the primary network is not available.

When this can't occur because of the phone itself, and it cannot be fixed, telcos have a regulatory responsibility to communicate with the customer and block the phone from the network, ensuring customers are not left with a false sense of security.

The government has also strengthened requirements for telcos to do more rigorous device testing through delivering Recommendations 3 and 4 of the Bean Review – ACMA has registered the new industry code that requires telcos to provide network equipment and support testing arrangements the Government is delivering through the University of Technology Sydney's (UTS) National Telecommunications Resilience Centre.

This will help ensure non-compliant devices continue to be identified and fixed or blocked if they can't be fixed.

Telcos are responsible for ensuring their customers can access triple zero, including participating in the UTS testing regime, for notifying customers impacted. The ACMA is the regulator responsible for making sure they meet these responsibilities.

Anyone impacted should contact their telco for support.

**When will testing at the University of Technology Sydney begin?**

It will begin the week commencing 3 November

We expect this testing process, combined with tighter compliance monitoring, to ensure as much as possible that phones available in Australia are able to call Triple Zero.

Already under existing rules introduced in 2024, telcos must identify mobile phones that are unable to access the emergency call service, notify affected customers and provide assistance to these customers.

This further testing will make sure more device testing is done in a range of scenarios and will ensure the system is better for all users.

**How many devices have been affected?**

We understand from industry that there are 11 Samsung device models which will need to be replaced by about 70,000 customers. The telcos have already commenced notifying affected

customers. There are a further 60 odd Samsung devices for which a software update is expected to address the issue. The telcos are working as a priority to identify the numbers of customers with these device models who have not already done the software updates.

When the 3G network was shut about 276,000 devices had to be blocked.

**How many people haven't been able to call Triple Zero because of this issue?**

The recent outage at Wentworth falls brought this issue to light. Other than the report in that instance, we are not aware of any other instances, although I'm sure this will be something the ACMA is looking into.

**Do telcos need to replace people's phones?**

Telcos have a moral responsibility to look after their customers. I know they are working with vulnerable customers directly to offer replacement devices as they should.

**Why wasn't this sorted after the 3G shutdown?**

This is obviously a concern and ACMA will be looking into why these additional devices were not identified previously, though the initial indication is that this issue has occurred due to a very specific combination of circumstances.

If telcos have breached their obligations they will face consequences.

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

**To:** The Hon Anika Wells MP, Minister for Communications and Minister for Sport (for decision/for information)

**Subject:** Uplifting Mobile Phone Compliance with device standards

**Timely Date:** Routine.

**Recommendation:**

1. That you **sign** the letter to the Chair of the ACMA at **Attachment A** requesting the ACMA implement a mobile phone compliance database.

**Signed / Not Signed**

The Hon Anika Wells MP

Date: **30.10.25**

**Comments:**
**Key Points:**

1. Our experience with the 2023 and 2025 Optus Outages and 3G network closures, and recently revealed information about popular handsets operating on the TPG network, suggests a more active approach to mobile device compliance is required. The variety of mobile devices and their diverse behaviour on networks is challenging telcos' ability to ensure all devices operate effectively and most importantly, can call Triple Zero (as is required by regulation).
2. This submission recommends you request the Australian Communications and Media Authority (ACMA) use existing resources and powers to establish a baseline database of mobile phones which meet Australian technical standards. Such a database would provide critical information to telecommunications providers for network configuration and enhancing access to Triple Zero, and would provide consumers with transparency about the compliance and capability of their mobile phone. A draft letter to the ACMA Chair is at **Attachment A**.

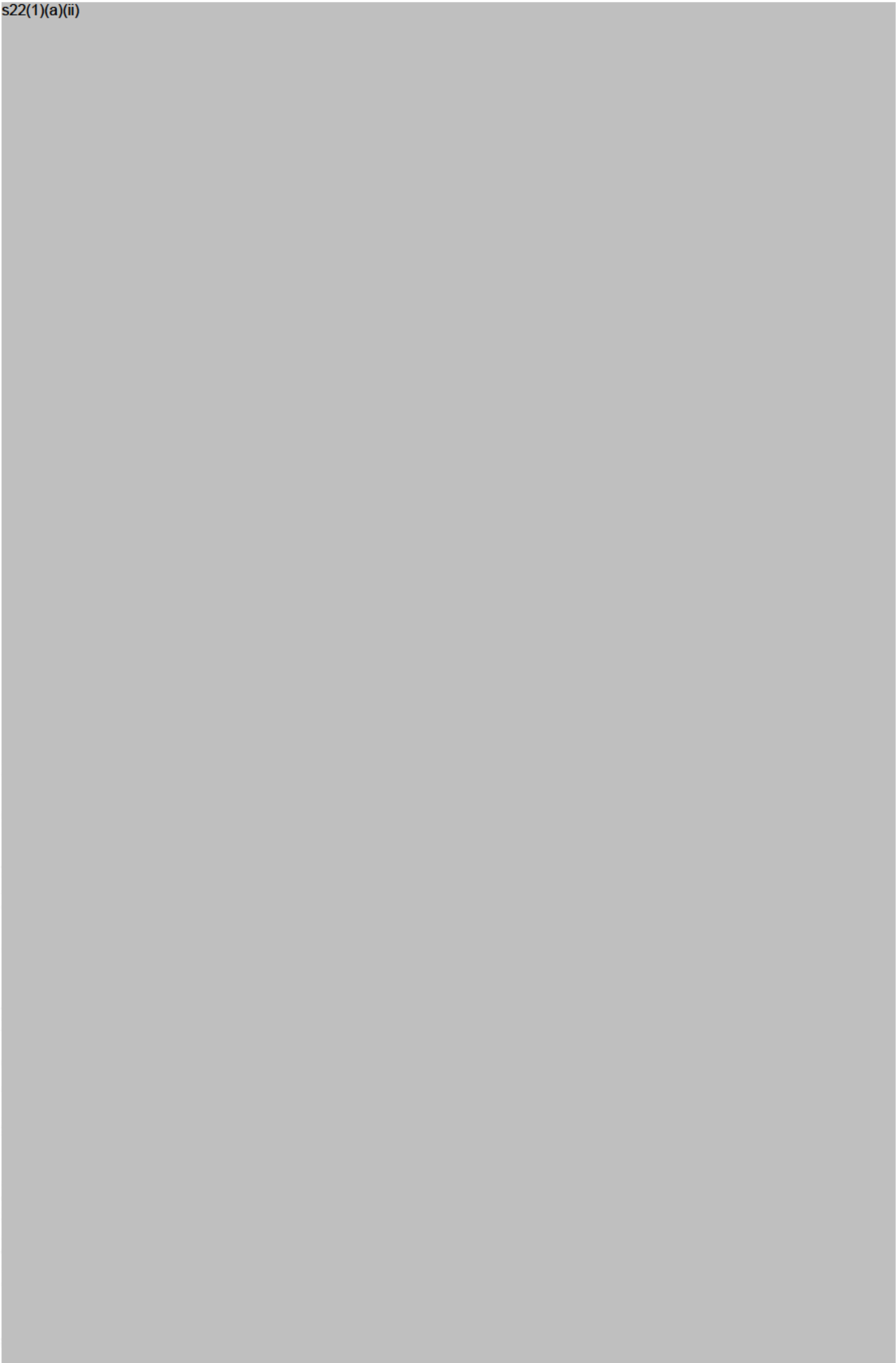
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Cleared By: Clare Chapple  
Position: FAS  
Division: Triple Zero Custodian  
Mob: s22(1)(a)(ii)  
Cleared Date: 30 October 2025

Contact Officer: Kath Silleri  
Branch: Triple Zero Operations  
Ph: 02 s22(1)(a)(ii)  
Mob: s22(1)(a)(ii)

**Instructions for Ministerial Services:** Nil

**Do you require a signed hardcopy to be returned:** No

**Responsible Adviser:** s22(1)(a)(ii)

**PDMS Distribution List:** Jim Betts, James Chisholm, Clare Chappell, Kathleen Silleri, s22(1)(a)(ii)  
s22(1)(a)(ii) Clare Chapple, Chris Fogarty

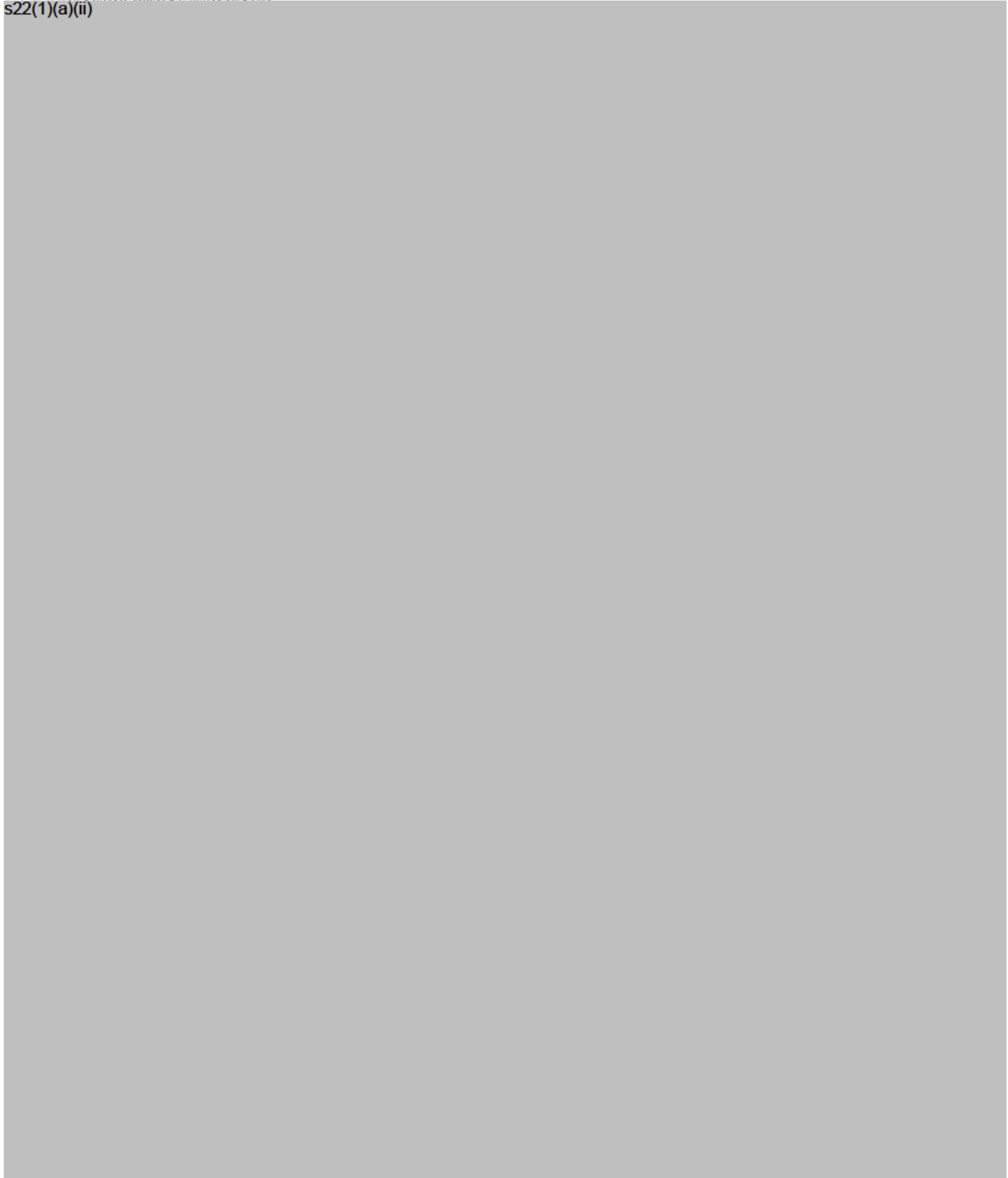
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**Additional Information:**

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**Increasing technological complexity**

- Modern mobile phones are becoming increasingly complex as new technologies are adopted. This was demonstrated during the 3G network closures, where, after the 3G networks were shutdown, certain phones could still make regular calls but would be unable to call Triple Zero.
- The department has concerns that this will be repeated in future with new technologies such as 5G Stand Alone during the eventual 4G network closures.
- In response to concerns about the 3G network closures resulting in some consumers being unable to call Triple Zero, the previous Minister for Communications directed ACMA to

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introduce requirements for telecommunications providers to not provide service to mobile phones unable to call Triple Zero.

- Unfortunately, it has become clear Telstra, Optus and TPG are unable to accurately identify these devices in all cases. The department and ACMA have received considerable correspondence from consumers noting they have been blocked on some networks, but are provided service on others. Further, many have demonstrated their mobile phone can make Triple Zero calls despite being blocked on a provider's network.
- This was covered in an ABC news article on 27 May 2025, *Telstra and Optus are inconsistently blocking phones. The regulator doesn't know how many*. You also met with a concerned constituent, <sup>s47F</sup> to discuss this matter on 17 September.

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WATCH POCKET BRIEF

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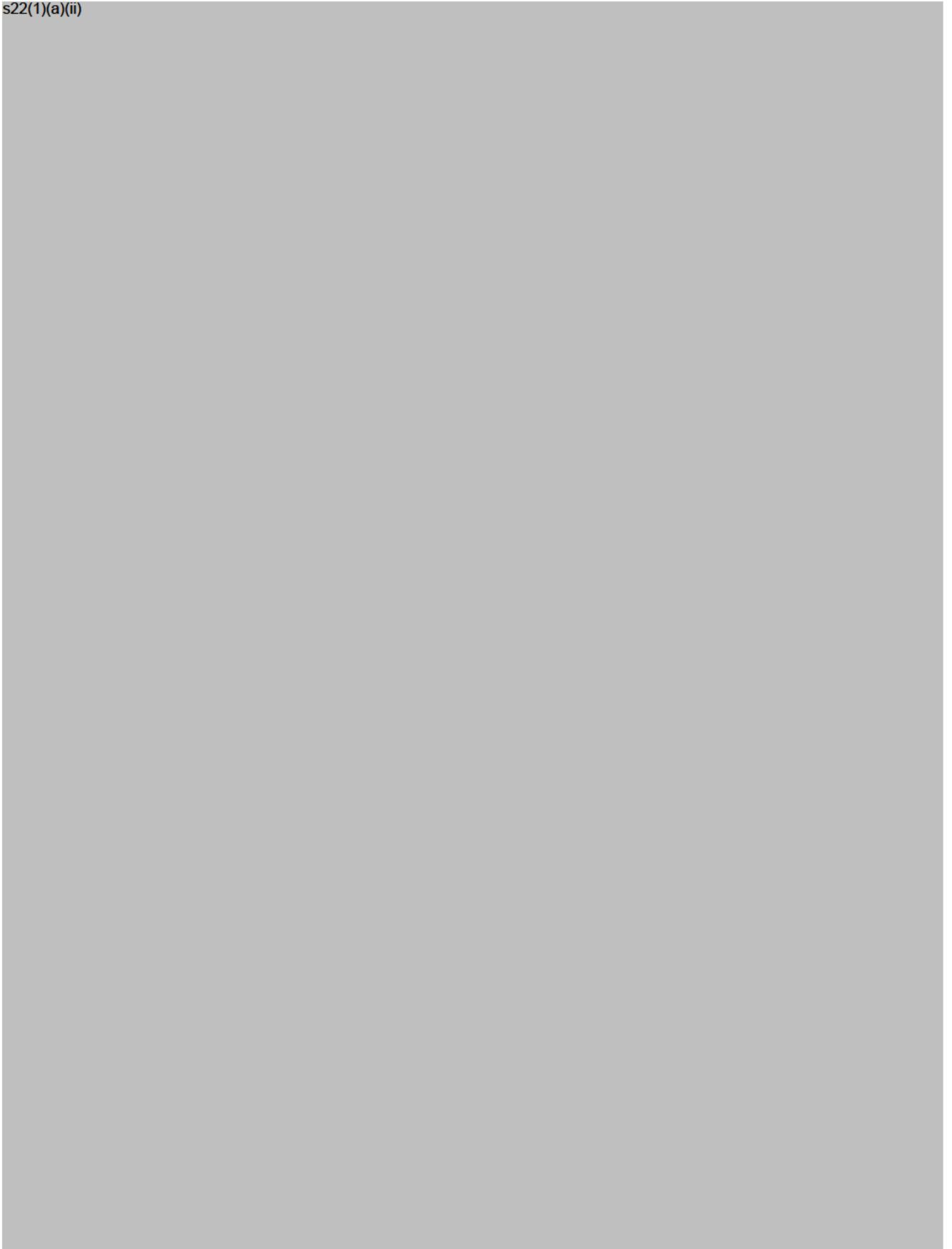
**3G switch off: Key Issues****LEAD:** Andrew Irwin**TALKING POINTS**s22(1)(a)(ii)  


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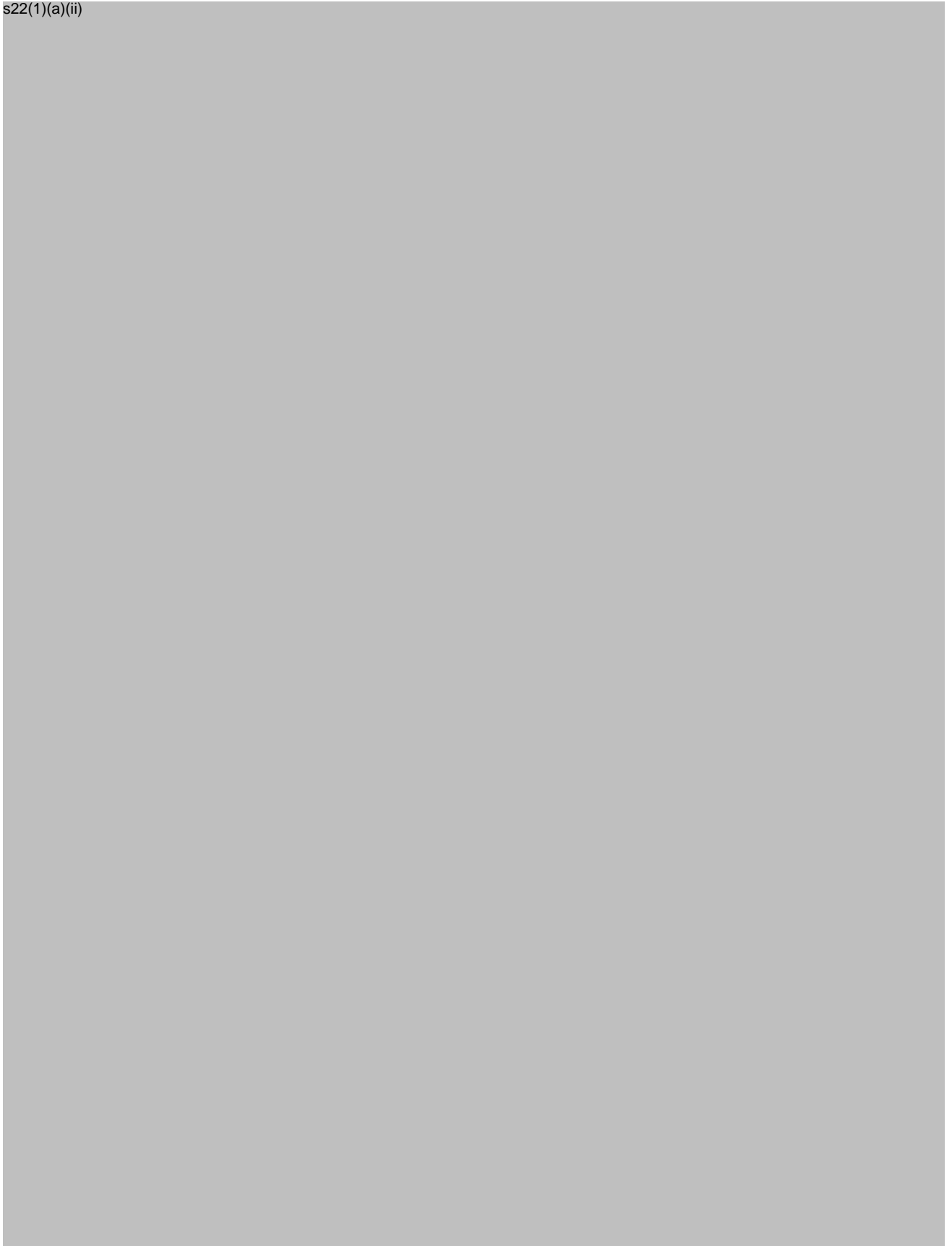


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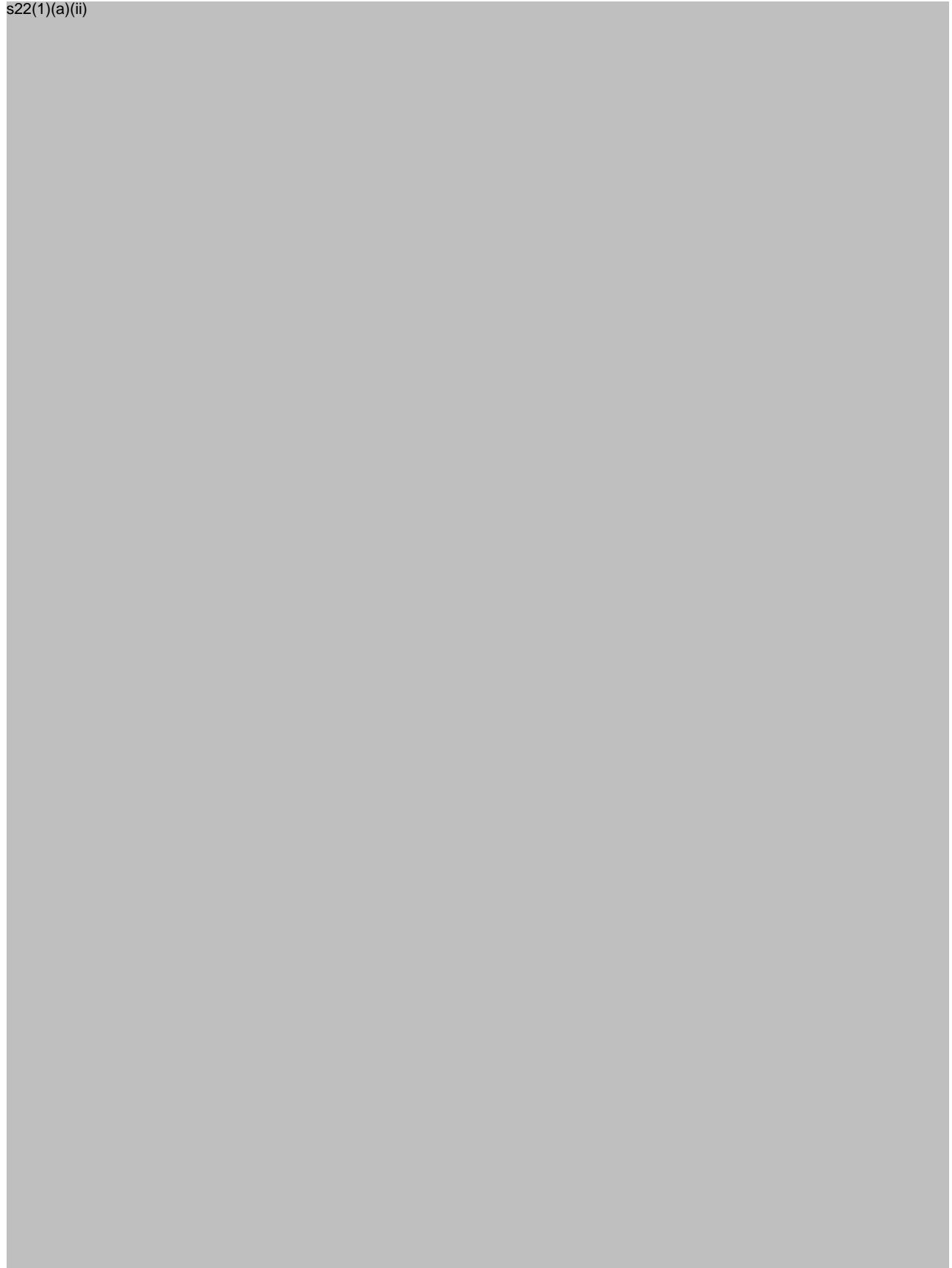


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**Device blocking****Have unaffected devices been blocked by mistake?**

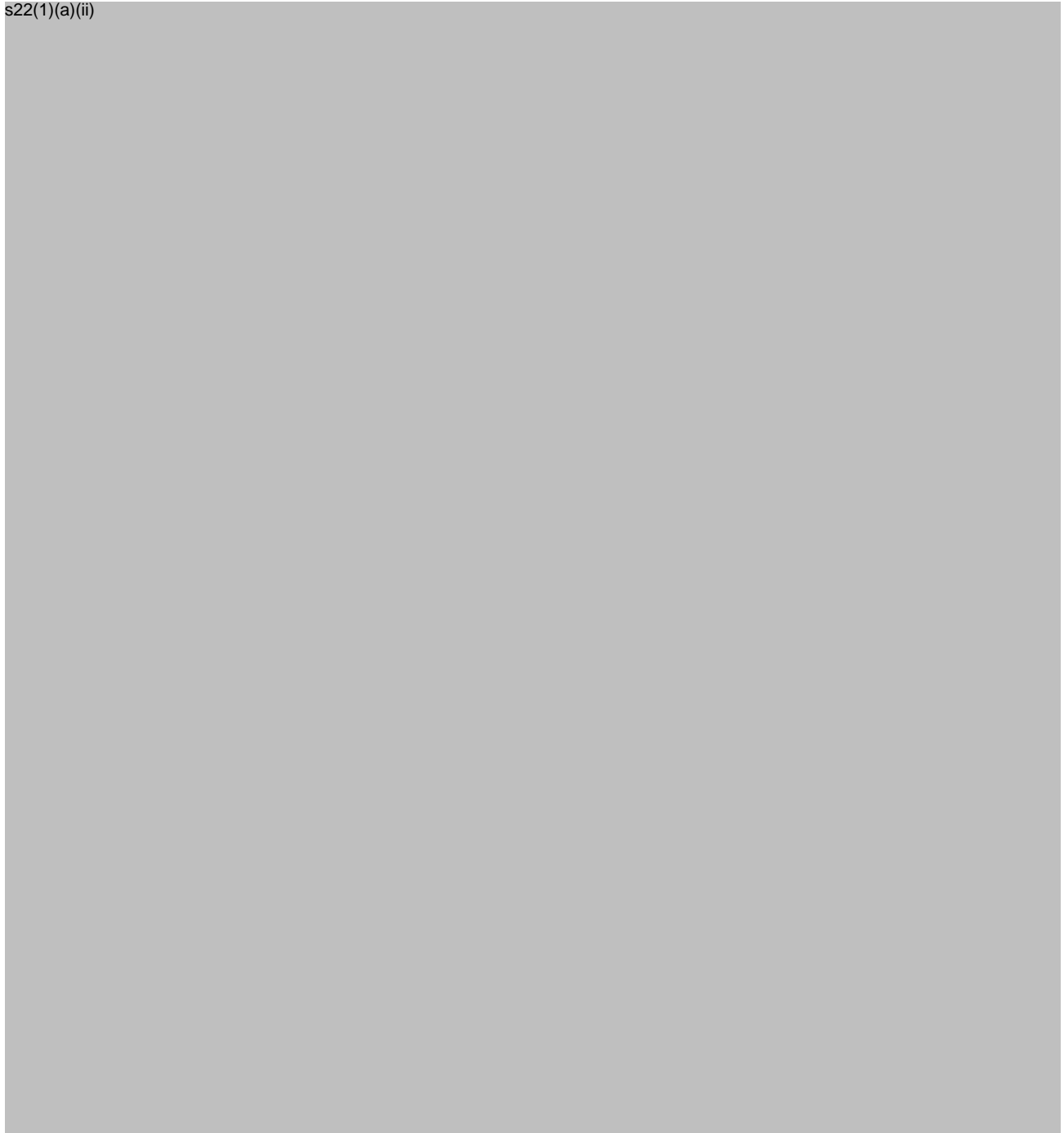
- The former Minister has made her expectation clear to the telecommunications industry that devices affected by the 3G switch off were to be reliably identified.
- The mobile network operators reviewed network data, examined past call records and engaged with international industry associations and handset manufacturers.
- Prior to the switch off, Telstra, Optus and TPG Telecom's device identification methodologies were independently verified by Mr Mike Wright, an industry expert, with over 40 years of experience in the telecommunications industry.
- The independent expert concluded that, in his professional opinion:
  - the methodologies applied by Telstra, Optus and TPG Telecom were based on sound and established industry practices
  - these methodologies are consistent with how operators in other jurisdictions would approach the issue
  - there were no material differences between the operators' approaches that raised concern, and
  - the operators have refined their methodologies and identified shortcomings to the point where remaining errors would be minor.
- If an end user believes their device has been blocked in error, their service provider is best placed to address questions regarding whether or how their device is impacted.

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- If a customer is unsatisfied with their service provider's response, they could raise their concerns with the Telecommunications Industry Ombudsman (TIO).
- Australians can also make a complaint to the ACMA about carrier non-compliance with the ECS Determination. However, the ACMA does not resolve individual complaints.
- The department has engaged the University of Technology Sydney (UTS) to assist Australian Telecommunications Alliance to produce an industry code and develop a testing regime to identify issues within their respective networks that may be a barrier to facilitating emergency call camp on functionality.

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### Phones that do not support band 28/700 MHz

- The 700MHz band is the primary frequency for Telstra and Optus to deploy 4G coverage in Australia.
- Some devices, especially some bought overseas, do not support 700MHz spectrum and therefore have reduced 4G coverage.
- In most metropolitan areas, these devices may continue to function normally or with reduced coverage by using other bands available.
- However, MNOs have notified these customers that in many regional areas, where the 700MHz band is the only frequency band available, they will not have access to any signal with these devices, including to Triple Zero.
- These devices have not been blocked under the ECS Determination.
- The former Minister asked the ACMA to consider a regulatory approach for these devices alongside its work in relation to the practicalities of exempting foreign travellers from handset blocking in line with the ECS Determination.

### Why do some devices work on some 4G networks but not others?

- At present some handset models are blocked by one provider but not others.
- These are very technical matters that depend on specific historic MNO network and device configurations, and the department recommends that detailed questions be directed to the MNOs.
- The situation is complex, but part of the reason is that over time the MNOs installed different 'carrier bundles' on devices. These carrier bundles provide the settings that dictate how a device will operate on different providers' networks, including whether a handset relies on either 3G or 4G for emergency call service access.
- From discussions in the Working Group, the department understands that from 2016 Telstra removed the 3G calling option from 4G handsets.
- By contrast, TPG Telecom relied on a global carrier bundle, which restricted emergency calls to the 3G network, which has led to that network having a higher proportion of impacted devices operating on the TPG Telecom network.
- The department has engaged the University of Technology Sydney (UTS) to assist Australian Telecommunications Alliance to produce an industry code and develop a testing regime to identify issues within their respective networks that may be a barrier to facilitating emergency call camp on functionality.

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#### Staged closures and implications for Triple Zero access

- In practice, Telstra and Optus switched off their 3G networks in phases that began shortly after 28 October 2024.
- This means that when regulated handset blocking took effect nationally on 28 October 2024, Australians with affected devices lost voice and data services but retained access to Triple Zero for a short period until the 3G network in their individual states are switched off.
- This created a strong incentive to upgrade, while protecting critical public safety services.
- Telstra switched off its 3G network in Tasmania on 30 October 2024, and the rest of Australia followed on 3 November 2024.
- Optus undertook a sequence of 3G closures in the following order:
  - Queensland, South Australia and the Northern Territory from 4 November 2024
  - Victoria and Western Australia from 11 November 2024, and
  - New South Wales, Tasmania and the ACT from 18 November 2024.
- The vast majority of Australians had somewhere between 1-3 weeks of Triple Zero-only service before the 3G networks were switched off.
- Telstra customers in Tasmania with impacted devices were able to access Triple Zero via Optus' network through camp-on, albeit with less coverage, until 18 November 2024. These customers were closely monitored by the mobile providers.
- The phased approach allowed mobile operators and the Government to monitor any unanticipated impacts and respond accordingly in the event that any issues emerge.

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**Post switch off monitoring and lessons learned****Post-switch off governance**

- The Government and department worked with MNOs to ensure that arrangements were put in place so that concerns post switch off would be identified early and resolved swiftly.
- These arrangements required Triple Zero related issues to be instantly escalated.
- Mobile operators stood up dedicated teams to support customers with affected devices.
- As the 3G switch off progressed, the mobile operators reported to the government and met with the department daily.
- A National Coordination Mechanism meeting of key stakeholders could have been convened if necessary, to communicate issues across federal, state and territory, and critical sectors. That need did not arise.
- The Department implemented a framework for assessing reports received by the department, whether from members of the public, the industry, other Government agencies or elsewhere, to determine whether incidents needed to be escalated.
- In responding to concerns raised by members of the public, the department has identified and escalated certain frequently-raised issues, for example:
  - Correspondence about mobile phone blocking often related to Sony or Xiaomi handsets. The Department has engaged with the industry and the ACMA to better understand why these handsets are disproportionately represented in concerns raised with the department.

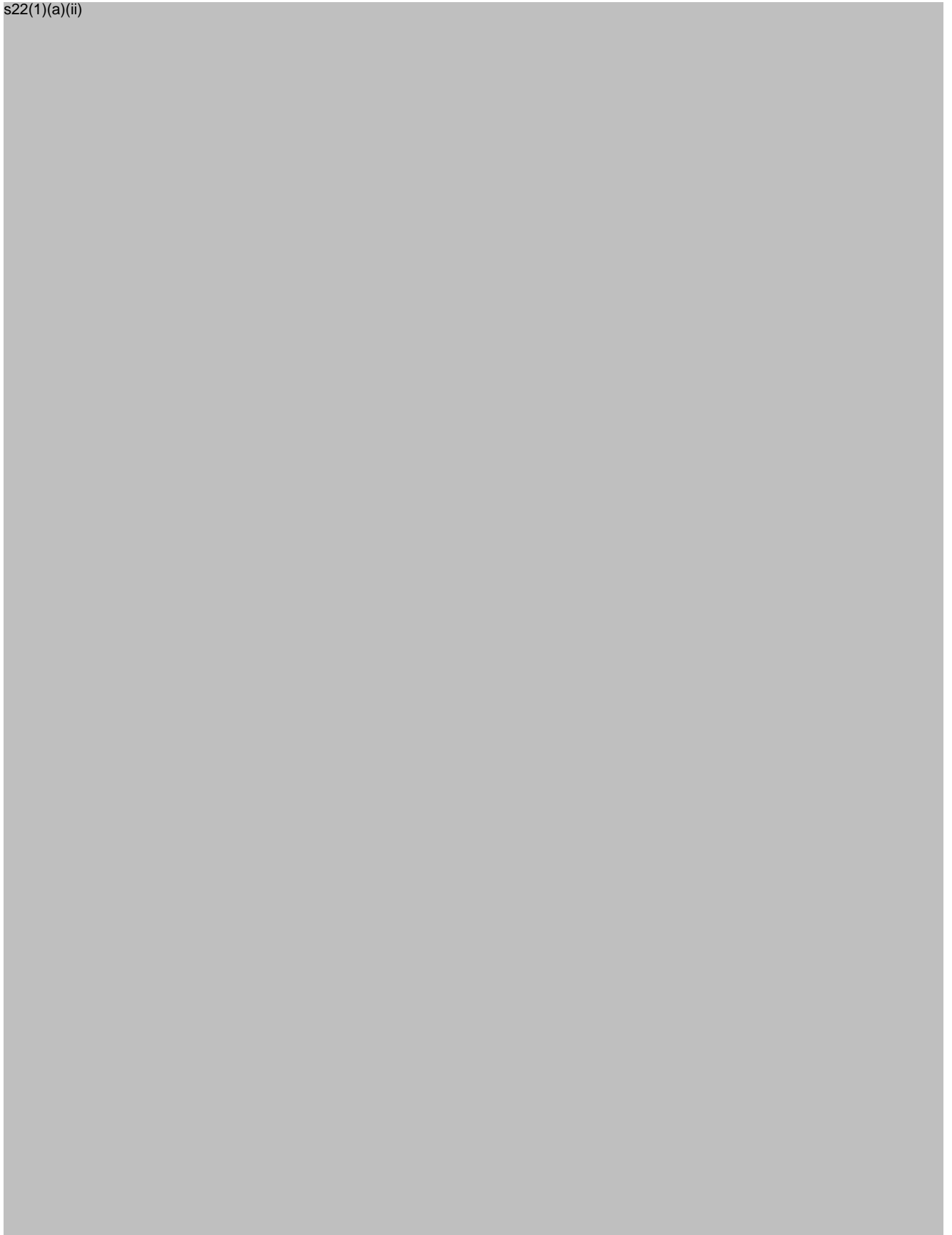
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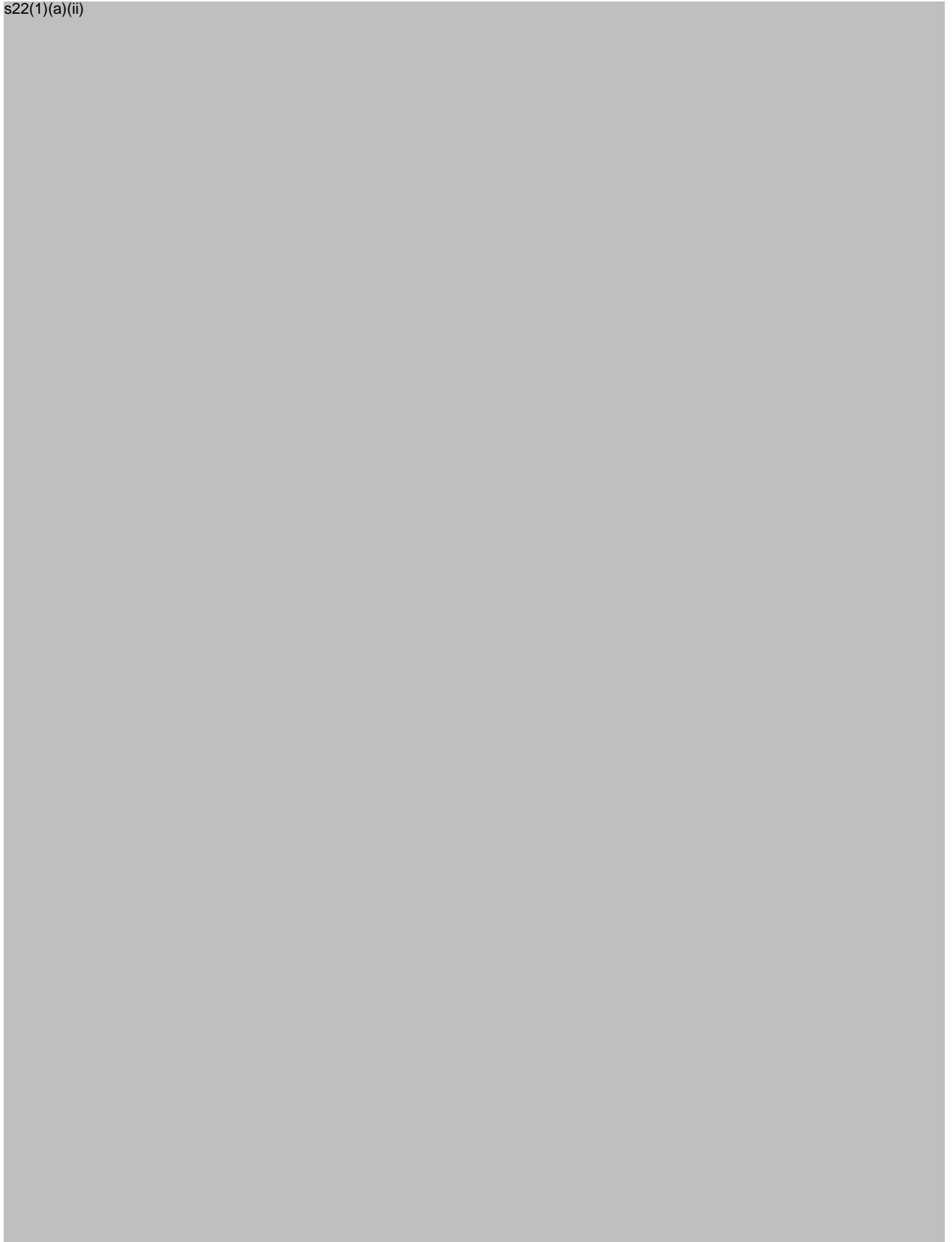


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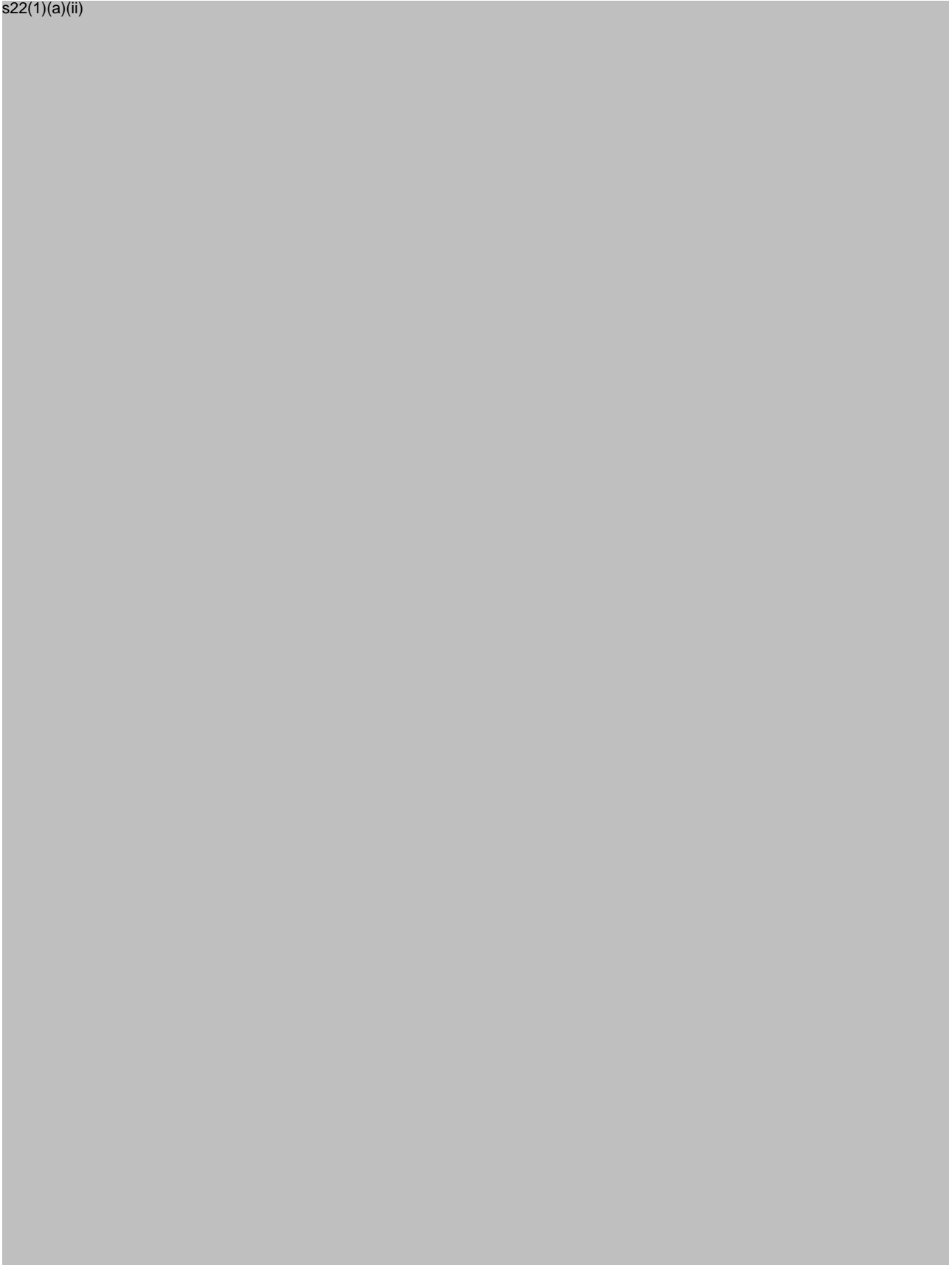


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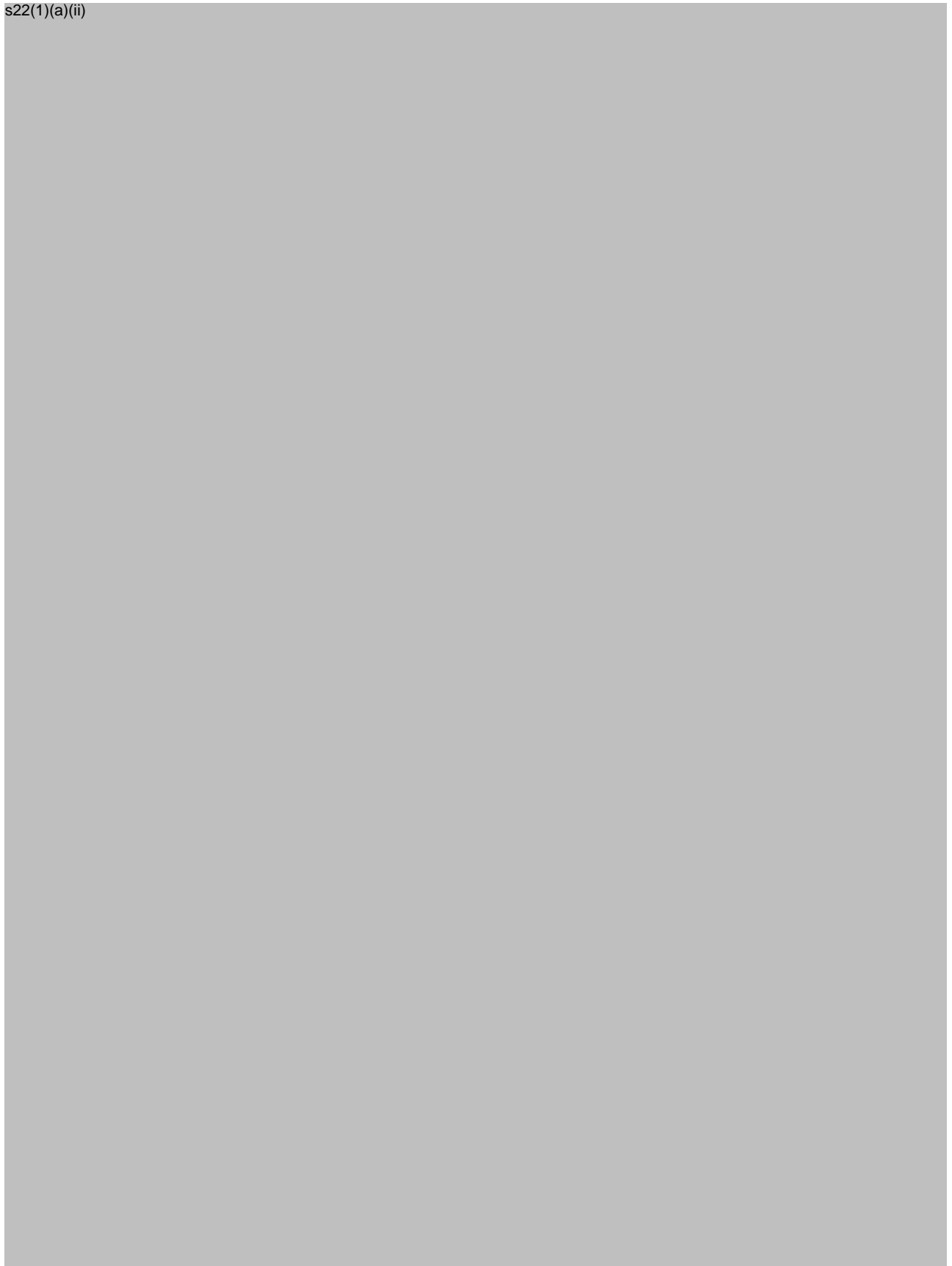


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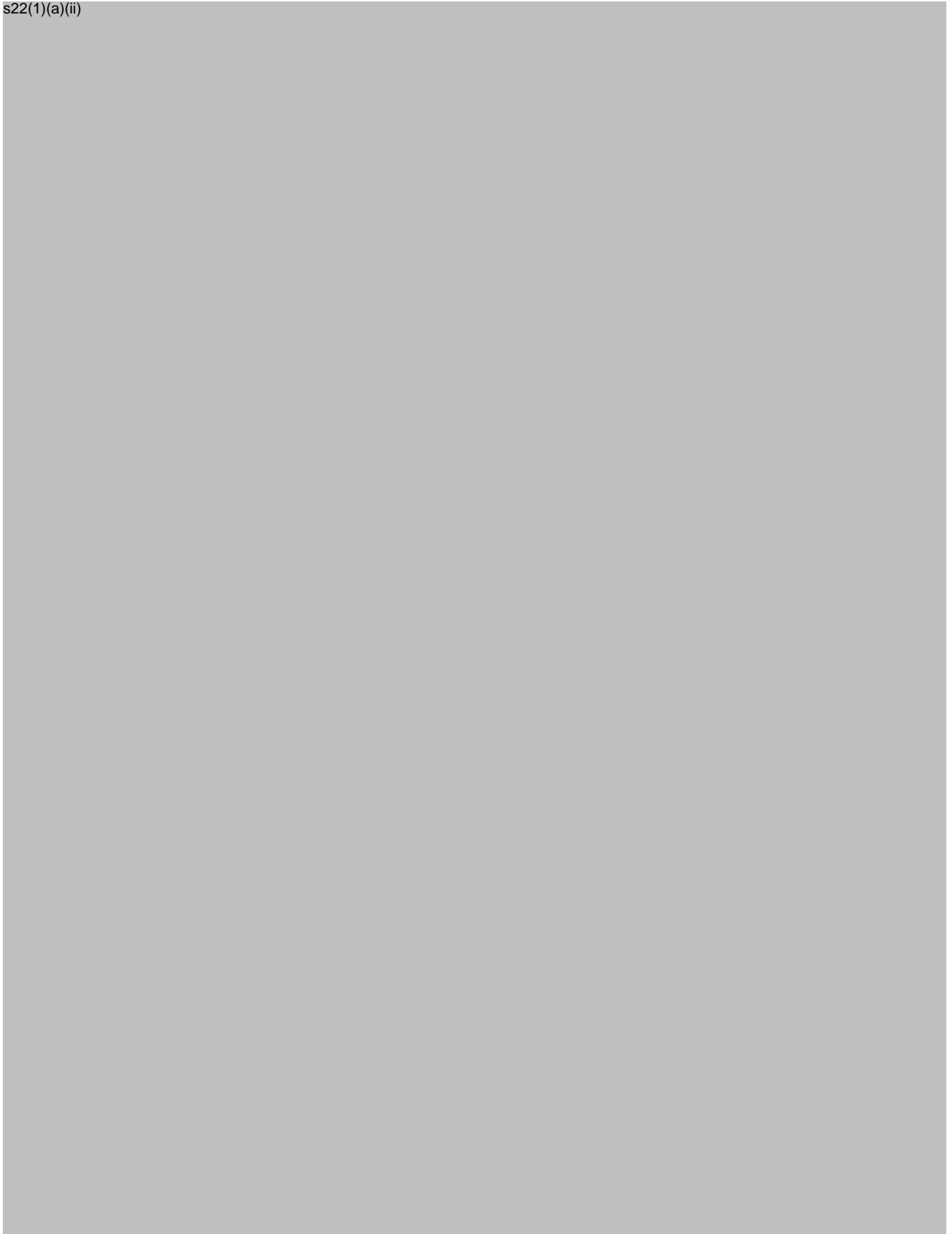
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### **Origins of the Working Group**

- The Government had been monitoring the telecommunications industry's preparations to switch off their 3G networks since Telstra announced its plans to switch off its 3G network in 2019.
- In July 2023, Optus indicated that it was undertaking analysis to identify devices that are Voice over Long-Term Evolution (VoLTE) capable but might rely on 3G for emergency calling.
- In October 2023, Optus provided updated aggregated device numbers that had increased by approximately 26,000 from July 2023. Optus attributed this increase to the identification of 4G-VoLTE devices that rely on 3G for emergency calling.
- Optus' 2 February 2024 report included that, as of the end of December 2023, the total number of impacted devices had fallen by around 101,000 since October. Optus indicated that these numbers included: 3G-only; CS fallback; VoLTE support unknown; and no LTE 700MHz band support.
- In a fact sheet released in November 2023, AMTA noted that a *very small proportion* of 4G devices that are VoLTE capable would not support calls to emergency services on the 4G network. AMTA also noted in this fact sheet that a very small number of people with 3G only handsets, tablets and connected devices would need to upgrade those devices.
- Telstra provided its quarterly report on 20 December 2023, which stated that 'some BYOD (bring your own devices) and older VoLTE handsets require 3G to make emergency calls'. Telstra stated that 'Telstra, Optus and TPG Telecom are currently working together to identify devices, to communicate with affected customers'. It also indicated that 'a subset of devices can be addressed via software and firmware upgrades over the air'.
- The department requested further briefing in early 2024. On 26 February 2024, the department was briefed in detail and the MNOs reported that up to 743,000 4G-VoLTE handsets providing Telstra and Optus services may be impacted.
- The former Minister wrote to industry (on 14 March 2024) requesting the 3G Networks Closure Working Group be established to formalise collaboration between industry, better identify impacted devices, improve the accessibility of public facing information and contact points, and amplify messages to ensure the community is aware of the switch off.
- The former Minister also requested the MNOs' action plans for addressing this issue, and fortnightly updates including a breakdown of data on affected devices.
- The Working Group first met on 22 March 2024, with meetings taking place weekly until late 2024.
- The department also met frequently with the former Minister and her Office to provide updates. From early March until late last year, the department met at least weekly with either the former Minister or her Office on this issue.

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### **Optus Outage Review - relevance to 3G Network closures**

- The Review into the Optus outage of 8 November 2023, focused on identifying gaps and flaws in the ecosystem through which access to Triple Zero is provided. The Review identified gaps in formal and informal arrangements, rules and processes. The review also determined that these gaps should be addressed to better guard against future events and ensure those events, when they occur can be handled in a manner that results in the least disruption possible.
- The majority of recommendations are now implemented.

#### ***Recommendation 1***

*Mandatory requirements should be put in place, by augmenting existing requirements or otherwise, to:*

- *More clearly and explicitly articulate precisely what is expected of network operators in regard to ensuring calls are delivered to Triple Zero*
- *Include specific obligations that network operators wilt towers in the event of loss of connectivity to a core network, ensuring calls to Triple Zero can be carried by other networks.*

- This recommendation was implemented through an amendment to the ACMA's Emergency Call Service Determination, introducing clearer requirements on carriers to ensure calls are carried to Triple Zero.

#### ***Recommendation 2***

*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.*

- This recommendation is not relevant to the 3G shut down.

#### ***Recommendation 3***

*This recommendation will mandate 6-monthly end-to-end testing of all aspects of the Triple Zero ecosystem within and across networks. This end to end detection testing includes:*

- *Network functionality and capability during outages of various types*
- *Behaviour of all known devices in different circumstances*
- *Interoperability of all parts of the ecosystem during outages*

*Any identified deficiencies must be reported to the ACMA and be accompanied by a remediation plan with a timetable.*

*This requirement should be mandated in a standard or determination.*

- This recommendation is being implemented through an industry code. Australian Telecommunications Alliance is working with AMCA to register this code.
- The department procured the services of University Technology Sydney to assist in the development of this code, utilising the technical expertise and facilities available through the university.

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*Recommendation 4*

*If this testing does not include devices supplied by the customer (i.e. 'Bring your own device') then information should be provided to those customers warning that those devices may not have been tested in emergency scenarios.*

- This recommendation follows from recommendation 3 and will require providers to supply customers with “bring your own device” (grey market, international, etc.) handsets with information warning that they may not be able to call Triple Zero.
- This recommendation is also being implemented through the industry code.

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## Concise 3G timeline

Date	Action
s22(1)(a)(ii)	
06/06/23	<p>s47F letter focused on the issue of '4G devices that are not compatible with VoLTE [Voice over Long-Term Evolution] technology'. These phones will not be able to make or receive any phone calls (including Triple Zero calls) once the 3G services are switched off. This was a known problem that was being appropriately managed by the MNOs. Each of the MNOs had specifically identified these devices on their web pages as being impacted.</p> <p>The Hon David Coleman has made reference to s47F letter in media reports, where he has been quoted:</p> <ul style="list-style-type: none"> <li>• "It's very hard to believe that the Minister did not know about the coming problems regarding triple-0 calls after the 3G networks are shut off until March of this year," Mr Coleman said.</li> <li>• "The Minister was warned in June last year, but her office did not respond, and instead fobbed off the inquiry to her department. The department then responded in September, revealing that they were receiving quarterly updates from Telstra on the 3G shutdown.</li> <li>• "Had the Minister taken action last year, we could have avoided this last-minute, desperate scramble to fix these issues. Instead, the public is now paying the price as the government tries to play catch-up."</li> </ul> <p>However, s47F letter does not refer to the devices of most concern. These devices are 4G VoLTE capable but hardwired to use 3G for Triple Zero. These devices will continue to operate normally, including making voice calls, except for calls to Triple Zero. Consumers won't know that their device is impacted until they need to call Triple Zero and can't get through.</p>
13/07/23	Optus provides first quarterly report to the department. The report indicated that it was 'performing some further analysis to identify the devices that are VoLTE capable

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Date	Action
	but might rely on 3G emergency calling'. This was the first time material provided to the department indicated the industry was investigating this as a potential issue.
05/10/23	<p>Optus provides its second quarterly report to the department, which included updated aggregate device numbers. There was a relatively modest increase of approximately 26,000 from last reporting period. Optus attributed this increase to the identification of 4G-VolTE devices that rely on 3G for emergency calling.</p> <p>Optus also indicated that further analysis was continuing on the 'Emergency call fall back' cohort and that the MNOs met regularly to collaborate and share learnings regarding Triple Zero impacted devices and that the forum would share findings with Government.</p>
s22(1)(a)(ii)	
21/11/23	Provides the department with a fact sheet (accompanied by a media release) that it intended to publish on 22 November. The fact sheet notes that a 'very small proportion of 4G devices that support voice calls over 4G VolTE do not support voice calls to emergency services over 4G.'
20/12/23	<p>Telstra provides a quarterly report update to the department. Page 12 of the report states 'Some BYOD and older VolTE handsets require 3G to make emergency calls'. Telstra states that:</p> <ul style="list-style-type: none"> <li>'It is confident that devices sold 'officially' in Australia can make emergency calls as they were tested to the Regulatory Compliance Mark'.</li> <li>'Telstra, Optus and TPG Telecom are currently working together to identify devices, to communicate to impacted customers'.</li> <li>'The GSMA [Global System for Mobile Communications Association] and Mobile Wireless Forum have been engaged to assist in developing a comprehensive list.'</li> <li>'A subset of devices can be addressed via software/firmware upgrade over the air.'</li> <li>'62,000 devices have been identified thus far'.</li> <li>'We have briefed ACMA and will continue to engage with them to strengthen customer engagement activities'</li> </ul> <p>The department asks Telstra and industry further questions about these devices in early 2024 and is briefed by industry in February 2024.</p>
30/01/24	TPG Telecom ceases the operation of its 3G network. TPG Telecom customers with impacted 4G VolTE devices should be able to camp on to either the Optus or Telstra network to make Triple Zero calls if their device requires 3G for emergency calling.
02/02/24	Optus provides an update on its 3G network switch off progress. Optus report indicates that the total number of impacted devices had fallen by around 100,000 devices.
12/02/24	Following questions from the department, Telstra confirms that some 4G VolTE-capable devices will not be able to call Triple Zero after the 3G network switch off and that this is a separate category of device.

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Date	Action
26/02/24	Telstra, Optus and TPG Telecom provide a brief to the department and the former Minister's office on the scope and consequences of issues impacting Triple Zero calls. We are informed that an estimated 740,000 devices may be impacted.
07/03/24	The department provides briefing to the former Minister in relation to the issue of 4G devices that are VoLTE capable but rely on 3G for emergency calls.
14/03/24	Former Minister Rowland writes to the MNOs and the AMTA requesting the formation of a working group to address the issue of devices that rely on 3G to make emergency calls, along with the provision of action plans for informing impacted customers and fortnightly updates.
17/03/24	Former Minister Rowland issues a media release announcing the standing up of a working group to focus on emergency call-impacted devices.
22/03/24	First meeting of the 3G Networks Closure Working Group. These meetings have since been held on a weekly basis.
25/03/24	The MNOs provide their action plans for informing impacted customers. The MNOs advise that there is estimated to be over 1 million impacted customers that could potentially be impacted. That is, they may have a 4G VoLTE capable device that uses 3G for Triple Zero calling. Estimates of impacted customers and activities to inform the owners of affected devices have since been provided on a fortnightly basis.
08/04/24	The MNOs provide the first fortnightly update on their efforts to identify and migrate customers with impacted devices. The MNOs advised that they have identified 857,559 4G VoLTE devices that may use 3G to contact Triple Zero.
16/04/24	The former Minister writes to the industry to reinforce the messaging on the gaps in the industry's action plans and reporting, and to refocus their individual and collective efforts in addressing the issues posed by 4G VoLTE—capable devices that rely on 3G to make Triple Zero calls, and 3G-reliant medical devices.
22/04/24	MNOs provide fortnightly update (365,287 4G VoLTE/ non-000 devices).
06/05/24	MNOs provide fortnightly update (534,944 4G VoLTE/ non-000 devices).
14/05/24	The former Minister writes to Telstra welcoming its decision to postpone its 3G switch off until 31 August 2024, and requests an update on progress to reduce the affected devices operating in the market and support customers.
20/05/24	MNOs provide fortnightly update (368,435 4G VoLTE/ non-000 devices).
03/06/24	MNOs provide fortnightly update (302,697 4G VoLTE/ non-000 devices).
s22(1)(a)(ii)	
17/06/24	MNOs provide fortnightly update (282,883 4G VoLTE/ non-000 devices).
20/06/24	The former Minister writes to the industry setting out a series of expectations relating to lead up to the 3G network switch offs, and requests that the MNOs provide updated action plans.
01/07/24	MNOs provide fortnightly update (205,112 4G VoLTE/non-000 devices)

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Date	Action
s22(1)(a)(ii)	
03/07/24	The MNOs provide the Former Minister with updated Action plans outlining completed and planned actions in relations to affected devices that may cease to operate as intended once the 3G networks are switched off.
s22(1)(a)(ii)	
09/07/24	The industry briefs the department on why some mobile handsets may behave differently on one MNO's network compared to another.
s22(1)(a)(ii)	
15/07/24	MNOs provide fortnightly update (102,171 4G VoLTE/ non-000 devices).
18/07/24	Meeting of the 3G Networks Closure Working Committee.
19/07/24	The department provided a written brief to the former Minister to with an update on the progress of the 3G Networks Closure Working Committee.
23/07/24	Public hearing of the Senate Inquiry into the 3G switch off in Cooma.
24/07/24	Public hearing of the Senate Inquiry into the 3G switch off in Canberra.
29/07/24	MNOs provide fortnightly update (approx. 77,000 4G VoLTE/non-000 devices)
01/08/24	The Senate Committee releases its interim report.
10-11/08/24	Telstra and Optus write to the former Minister proposing to delay their 3G network switch offs, conduct a 6-week public safety marketing campaign, and undertake a review of the industry's methodologies used to identify impacted devices.
12/08/24	MNOs provide fortnightly update (approx. 73,000 4G VoLTE/non-000 devices)
s22(1)(a)(ii)	

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Date	Action
s22(1)(a)(ii)	
14/08/24	Telstra and Optus announce the extension of their 3G network switch offs to 28 October and the accompanying public safety media campaign.
15/08/24	The department uploads to its website a short video that warns of 3G switch off and the need to check for impacted devices.
19/08/24	The government's response to the Senate Committee's interim report is tabled in the Senate.
21/08/24	The former Minister directs the ACMA to amend the Emergency Call Service Determination, such that carriage service providers must not supply carriage services to mobile phones that cannot call Triple Zero.
26/08/24	MNOs provide fortnightly update (approx. 71,000 4G VoLTE/non-000 devices)
09/09/24	MNOs provide fortnightly update (approx. 67,000 4G VoLTE/non-000 devices)
s22(1)(a)(ii)	
07/10/24	MNOs provide fortnightly update (approx. 59,000 4G VoLTE/non-000 devices)
s22(1)(a)(ii)	

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Date	Action
s22(1)(a)(ii)	
21/10/24	MNOs provide fortnightly update (approx. 53,000 4G VoLTE/non-000 devices)
23/10/24	Meeting of the 3G Networks Closure Working Committee.
s22(1)(a)(ii)	
28/10/24	The Emergency Call Service Determination is amended such that carriage service providers are now prevented from providing services to mobile phones that have been identified as being unable to call Triple Zero – including 3G-only, 4G without VoLTE and 4G VoLTE without Triple Zero access.
28/10/24 to 1/11/24	Telstra, Optus and TPG begin blocking the services associated with impacted devices.
28/10/24	Daily meetings with, and reporting from, the MNOs commence.
s22(1)(a)(ii)	

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s22(1)(a)(ii)

**Clearing Officer (Branch Head)**

Andrew Irwin

Assistant Secretary

Markets, Competition and Spectrum Branch

Ph (02) s22(1)(a)(ii)

Date 22/09/2025

**Contact Officer**

s22(1)(a)(ii)

Director

Markets and Competition

Ph (02) s22(1)(a)(ii)


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**Watch Pocket Brief –  
3G Switch Off: Key Issues**

s22(1)(a)(ii)



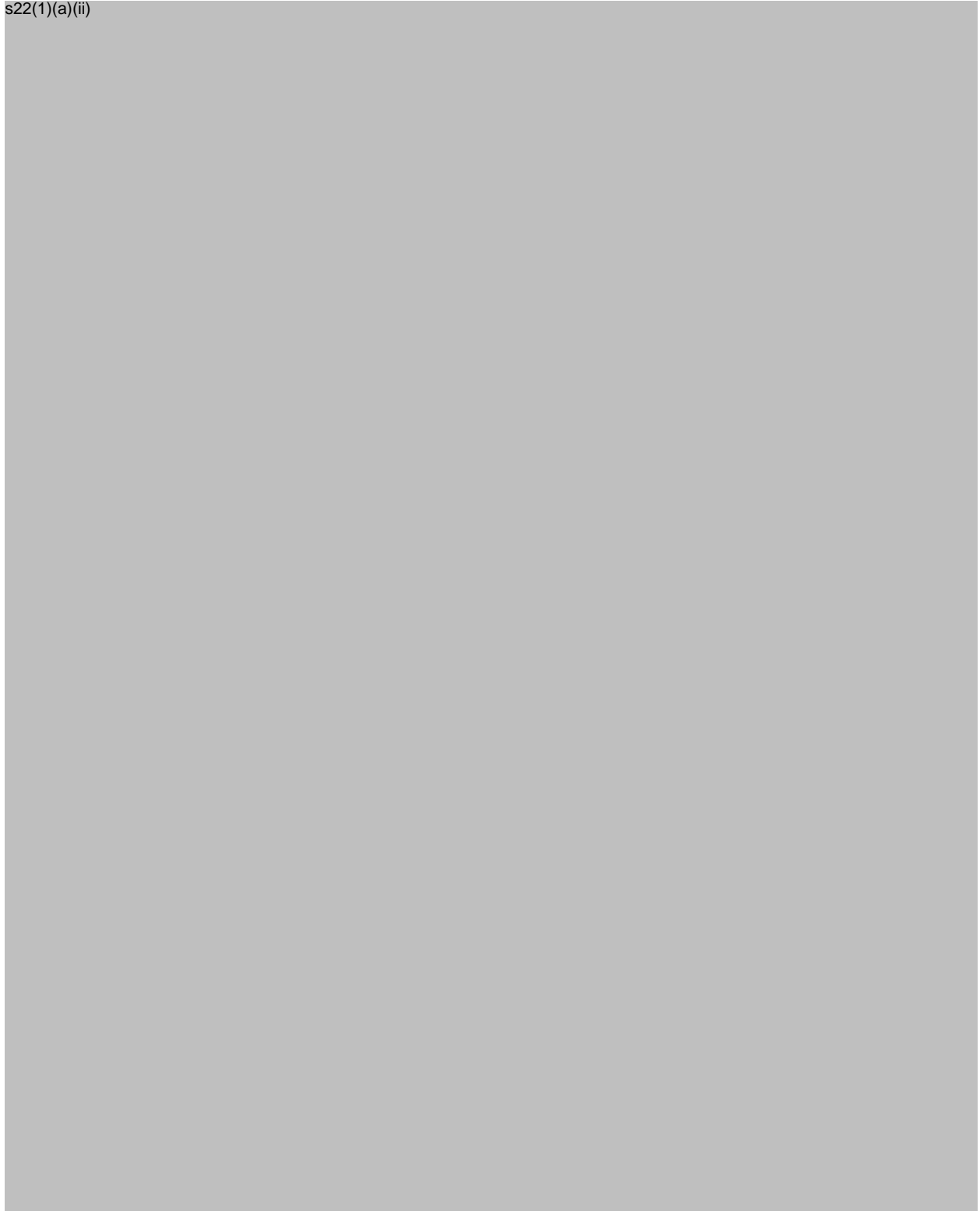
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**BACK POCKET BRIEF**

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**3G Network Switch Off****LEAD:** Andrew Irwin, Assistant Secretary**Talking Points**

s22(1)(a)(ii)



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**BACK POCKET BRIEF**

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s22(1)(a)(ii)

**Failed Vodafone Triple Zero Call**

- On 26 September 2025, the department became aware that a Vodafone customer attempted but was unable to make a Triple Zero call.
- The department has sought details of the matter with TPG Telecom and Telstra and the following has been ascertained:

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**BACK POCKET BRIEF**

- The customer was able to contact triple zero by alternative means.
- TPG Telecom confirmed that there was no evidence of network problems.
- Call volumes from Vodafone otherwise appear normal and are coming through as expected.
- Telstra advised that there was no evidence of the customer's phone camping onto the Telstra network.
- The customer's phone was a Samsung J2.
  - TPG Telecom confirmed that this is an older phone, but it was not blocked under the ECS Determination as it can make Triple Zero calls over 4G, but requires a software update or other user action to enable this functionality on the TPG network.
  - TPG Telecom advised that despite repeated messages to the specific user over many months, the functionality was not enabled, hence the phone was unable to call Triple Zero.
- The customer contacted emergency services via other means and was attended to.
- The paramedics tested the phone and confirmed it could not reach Triple Zero.
- The Department referred the matter to the ACMA for further consideration and possible investigation with respect to a possible breach or breaches, of the ECS Determination, given the person could make calls, but not Triple Zero calls
- The ACMA has subsequently advised that this matter is currently under active investigation.

**Device blocking**

- The Government's top priority in the lead up to the 3G switch off was to protect public safety by ensuring that all mobile phones connected to mobile networks are able to call Triple Zero.
- It has long been the case that any mobile phone connected to a network can call Triple Zero, even if a SIM is not connected, and in standby mode.
- On 21 August 2024, the Minister directed the ACMA to amend the *Telecommunications (Emergency Call Service) Determination 2019*, such that carriage service providers must not supply carriage services to mobile phones that cannot call the emergency call service (Triple Zero).
- On 27 September 2024, the former Minister requested that the ACMA bring into law these amendments prior to 28 October 2024.
- The amendment to the Emergency Call Service Determination commenced on 28 October 2024, the announced date for Telstra and Optus' 3G switch off.
- In practice, Telstra and Optus switched off their 3G networks in phases that began shortly after 28 October 2024.

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- This means that when regulated handset blocking took effect nationally on 28 October 2024, Australians with affected devices lost voice and data services but retained access to Triple Zero for a short period (from a few days to a few weeks) until the 3G network in their individual states were switched off.
- This created a strong incentive for remaining customers to upgrade, while protecting critical public safety services.
- Customers with an impacted handset had been contacted by their provider on multiple occasions ahead of 28 October 2024. This included through direct messages, emails, letters to registered addresses and recorded voice announcements on outgoing calls. Customers could also check if their handset was impacted by texting '3' to '3498'.

s22(1)(a)(ii)

**Lessons learned**

s22(1)(a)(ii)

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**Phone:** (02) s22(1)(a)(ii)

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- The switch offs raised questions within Government about emergency call service and device regulation in the context of network transitions.
- Similar issues relating to emergency call service regulation were examined in the Government's review of the 2023 Optus outage (referred to as the Bean Review).
- The Government agreed to the Bean Review's recommendation that the ACMA and Department review all legislation and regulation relating to Triple Zero, and work is underway to implement that recommendation.
- The former Minister has asked the ACMA to conduct a thorough review of the Emergency Call Service Determination, to ensure it remains fit for purpose in the current and emerging communications environment.
- The Minister directed ACMA to amend the Emergency Call Service regulations to address the Bean Review's recommendations. These changes came into effect on 30 April 2025.
- In its response to the 2024 Regional Telecommunications Independent Review Committee Report, the Government indicated that it is considering lessons learned from the 3G switch off and is committed to considering how to improve the oversight of major technology and network transitions in the future (such as the transition of customers from Sky Muster to Amazon Project Kuiper NBN services), to ensure they are conducted in an orderly and safe manner.

s22(1)(a)(ii)

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**Date:** 30/10/2025

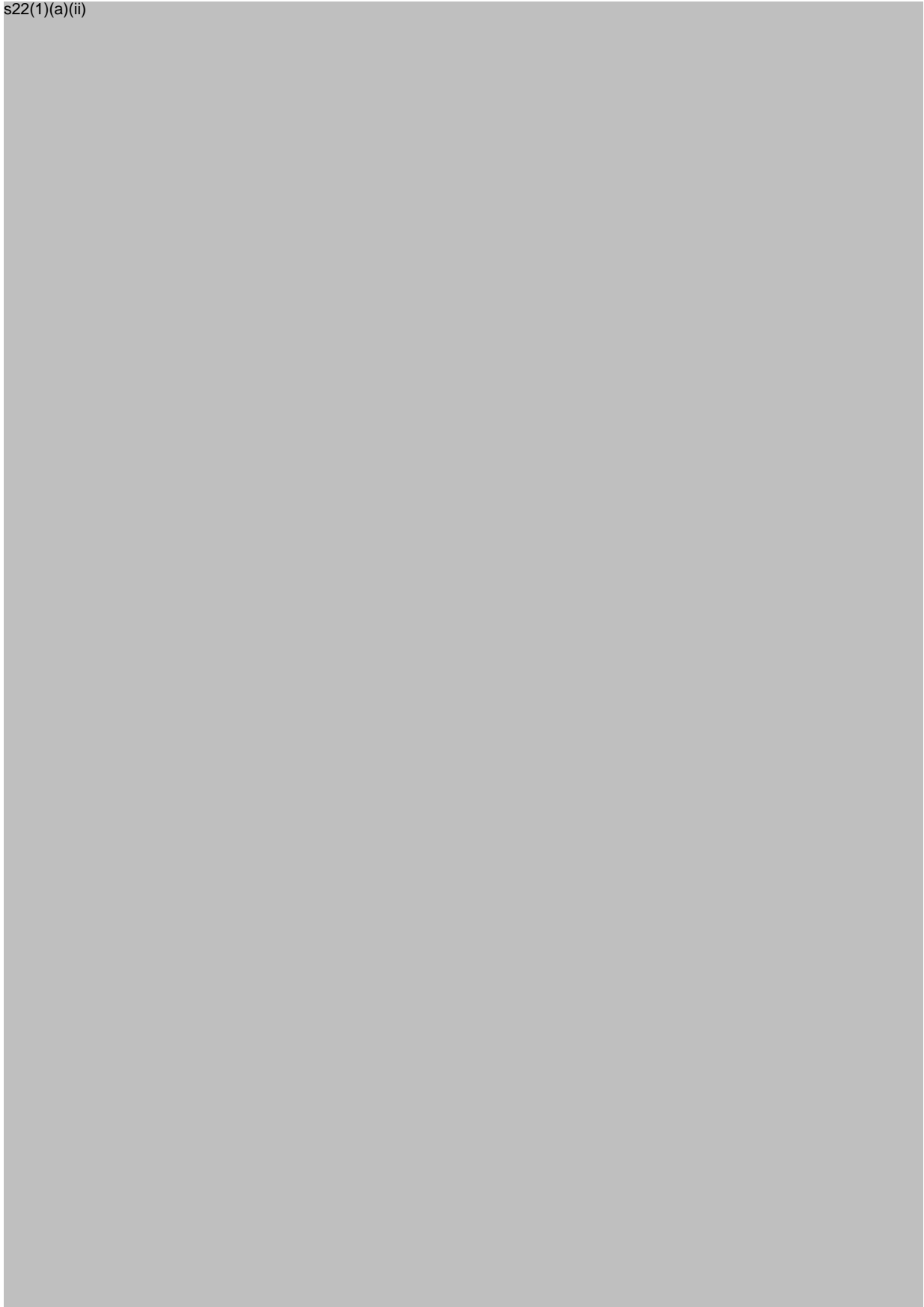
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s22(1)(a)(ii)



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s22(1)(a)(ii)

	<p>City of Busselton, WA</p> <p><i>(Source: feedback from Community Emergency Services Managers to Department of Fire and Emergency Services Superintendent)</i></p>	<p>Reports of areas that previously had coverage experiencing deteriorated coverage post-switch off. New blackspots have been identified. The Chief Bushfire Control Officer is no longer able to receive calls while on his farm and is currently exploring the installation of Starlink to ensure he can receive emergency calls through Wi-Fi calling. There have been reports of missed emergency response and 000 callouts, concerns over the system's ability to handle high-visitation periods and the ability of the public to receive emergency warnings. Also notes tower power failures that have left residents without comms for several hours.</p>	17 January 2025
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s22(1)(a)(ii)

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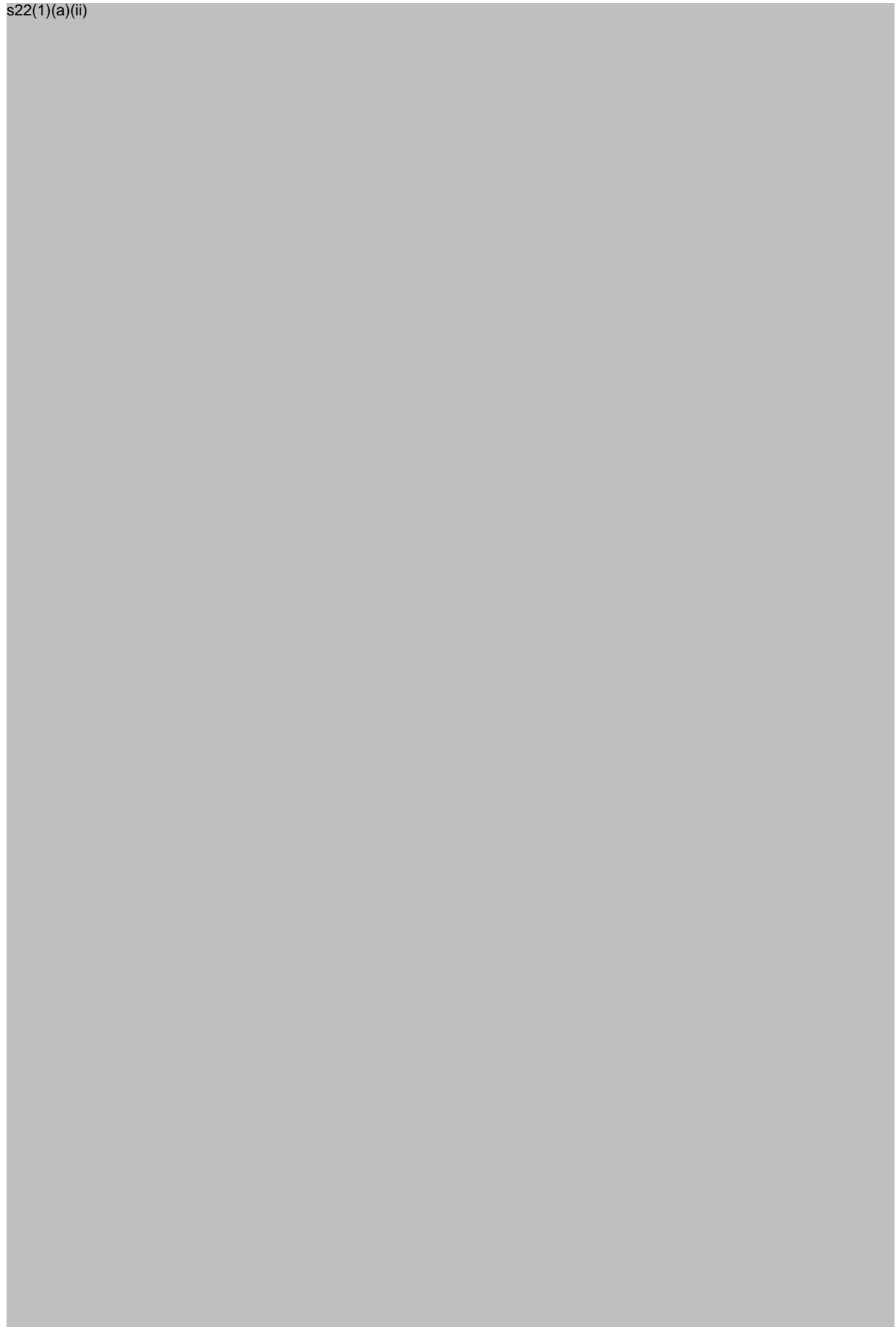
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s22(1)(a)(ii)



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s22(1)(a)(ii)



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**BACK POCKET BRIEF****3G Switch Off Roundtable – Communiqué (dated 17 December 2024)**

s22(1)(a)(ii)

The mobile network operators agreed to continue to support the Australian Communications and Media Authority in its work to implement recent changes to the Telecommunications (Emergency Call Service) Determination 2019 which came into effect in advance the switch off. This will deliver on the Government's policy that Australians' mobile handsets are able to call Triple Zero on all networks provided they are in a mobile coverage area.

The mobile network operators also agreed to work with the Communications Alliance to develop a device testing regime to determine whether a device can access the emergency call service on all networks.

This work is important to make sure that Australians can access Triple Zero in an emergency whenever there is mobile coverage available, regardless of which mobile network provider they choose.

Government and industry representatives also acknowledged the importance of technical standards and regulatory frameworks in ensuring that devices sold in Australia are compatible with Australian networks – and the risks to consumers of purchasing devices that are not designed for use in Australia.

Technological changes are based on commercial decisions. However, they have wide-ranging impacts on individual consumers and businesses. Connectivity is particularly

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**BACK POCKET BRIEF**

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important during emergencies, and it enables critical infrastructure and services to operate. Therefore, changes in technology need to be well-managed. As Australia looks towards future technology transitions, it is clear that government and industry will need to continue to work in partnership to protect the public interest, particularly public safety, and ensure positive outcomes for all Australians.

Government and industry agreed to continue to work together to embed learnings in future processes, to deliver better outcomes for Australians.

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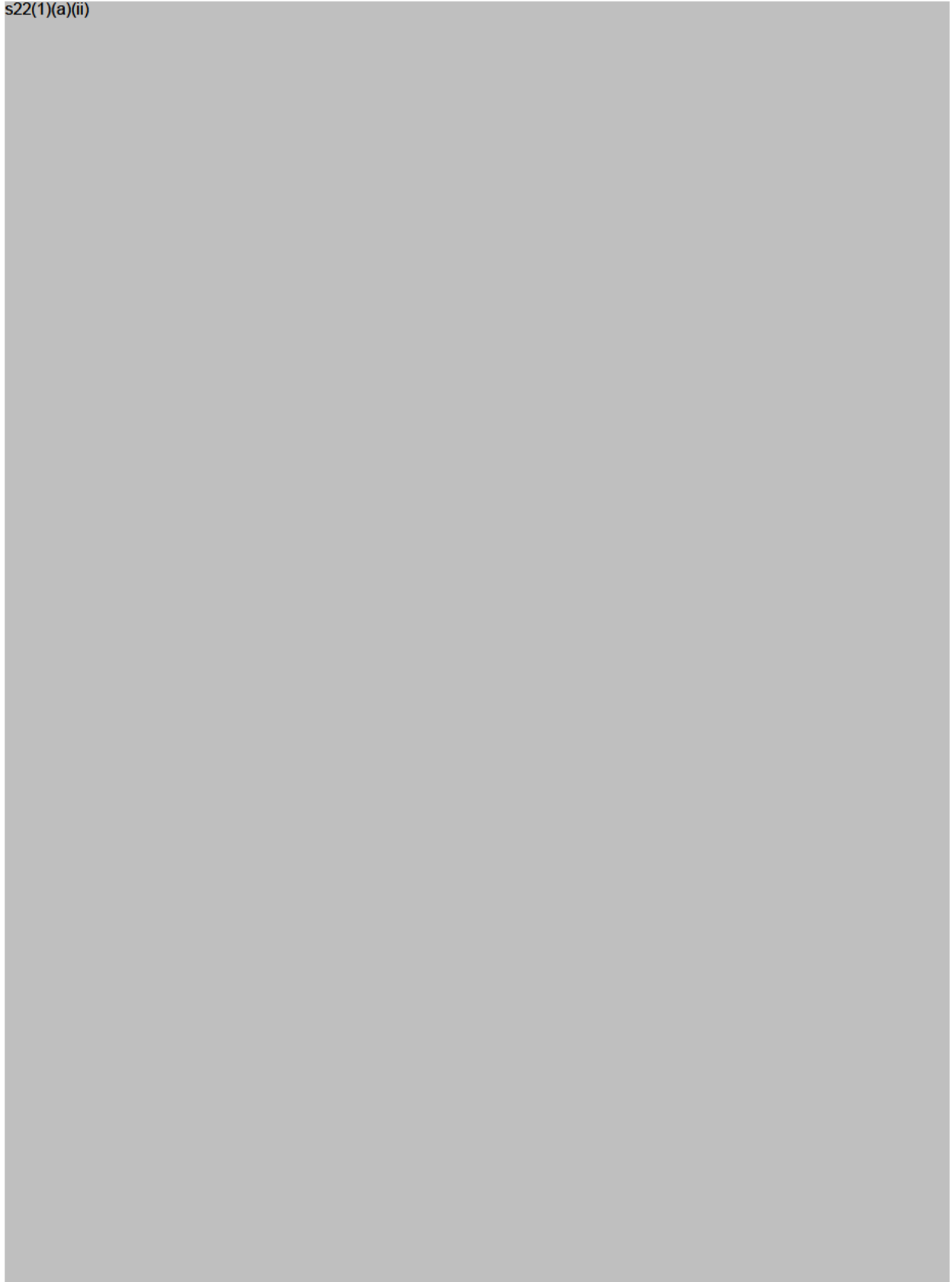
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s22(1)(a)(ii)



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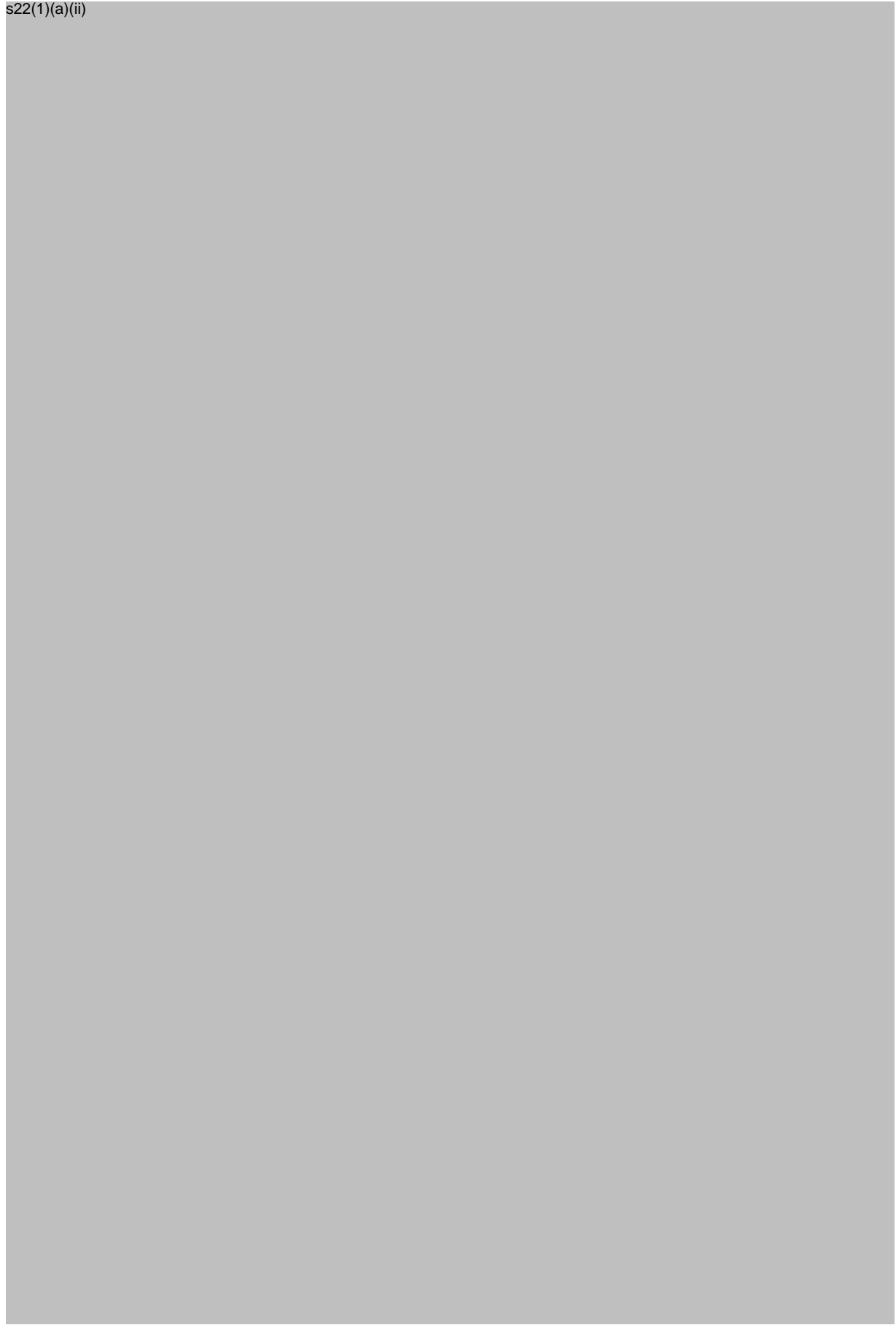
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s22(1)(a)(ii)



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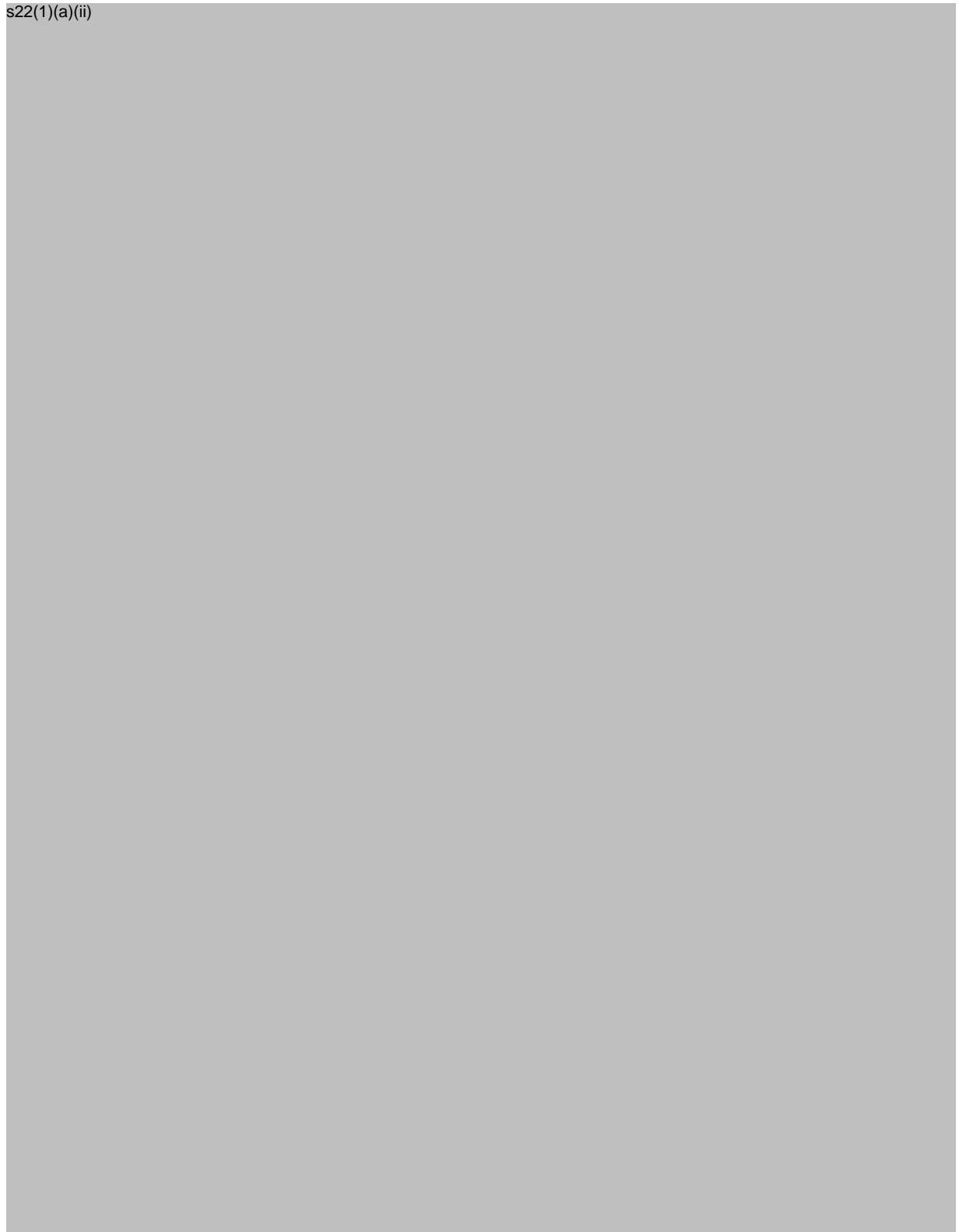
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s22(1)(a)(ii)



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s22(1)(a)(ii)



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s22(1)(a)(ii)

**From:** s22(1)(a)(ii)  
**Sent:** Tuesday, 4 November 2025 4:16 PM  
**To:** s22(1)(a)(ii) s22(1)(a)(ii)  
**Subject:** RE: Concern over Inability to call 000 [SEC=OFFICIAL:Sensitive, ACCESS=Personal-Privacy]

OFFICIAL: Sensitive // Personal-Privacy

Revised para with ACMA additions at the end:

The Department spoke with s47F on 3 November 2025. s22(1)(a)(ii)

He alleges there was a failed 000 call in the area late last year that ACMA is aware of (no further details). He also noted that there was a fire in the area in November 2024 where people had to evacuate and alleges that access to 000 was limited (no further details).

s22(1)(a)(ii)

Regarding the allegedly failed Triple Zero call, the ACMA requested s47F to provide further details.

OFFICIAL: Sensitive // Personal-Privacy

-----Original Message-----

**From:** s22(1)(a)(ii)  
**Sent:** 04 November 2025 15:55  
**To:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>  
**Cc:** s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>  
**Subject:** RE: Concern over Inability to call 000 [SEC=OFFICIAL:Sensitive, ACCESS=Personal-Privacy]

Just FYI - s47F replied to us today - attaching those emails here.

-----Original Message-----

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>  
**Sent:** 04 November 2025 10:55  
**To:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>  
**Cc:** s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>  
**Subject:** RE: Concern over Inability to call 000 [SEC=OFFICIAL:Sensitive, ACCESS=Personal-Privacy]

OFFICIAL: Sensitive // Personal-Privacy

Thanks, s22(1)(a)(ii) - I think this looks good, but I think s22(1)(a) should clear if it's going to the MO.

s22(1)(a)(ii)

OFFICIAL: Sensitive // Personal-Privacy

-----Original Message-----

From: s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>

Sent: Tuesday, 4 November 2025 10:37 AM

To: s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>; s22(1)(a)(ii)

s22(1)(a)(ii)@infrastructure.gov.au>

Subject: RE: Concern over Inability to call 000 [SEC=OFFICIAL:Sensitive, ACCESS=Personal-Privacy]

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Was chatting to DLO s22(1)(a) yesterday and he mentioned attaching a high-level summary of this call to the MO to use in a potential CoS reply. Is this para ok to send him?

s22(1)(a)(ii)

He alleges there was a failed 000 call in the area late last year that ACMA is aware of (no further details). He also noted that there was a fire in the area in November 2024 where people had to evacuate and alleges that access to 000 was limited (no further details).

s22(1)(a)(ii)

s22(1)(a)(ii)

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-----Original Message-----

From: s22(1)(a)(ii)

Sent: 03 November 2025 16:38

To: s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>; s22(1)(a)(ii)

<s22(1)(a)(ii)@infrastructure.gov.au>

Subject: RE: Concern over Inability to call 000 [SEC=OFFICIAL:Sensitive, ACCESS=Personal-Privacy]

Hi both - got in touch with s47F. Summary of call is below. s22(1)(a)(ii)

s22(1)(a)(ii)



s22(1)(a)(ii)

- Failed 000 call: ACMA is aware of this call. ACMA advised to contact Telstra however Telstra refused to provide public information regarding the details of this call.

s22(1)(a)(ii)

s22(1)

(a)(ii)

-----Original Message-----

From: s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>

Sent: 03 November 2025 14:42

To: s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>

Subject: RE: Concern over Inability to call 000 [SEC=OFFICIAL:Sensitive, ACCESS=Personal-Privacy]

OFFICIAL: Sensitive // Personal-Privacy

Thanks - when we call, it would be worth checking to see whether he has nbn and whether wifi calling inside would be an option. Unfortunately the nbn address checker doesn't seem to be working.

s22(1)(a)(ii)

Director | Markets & Competition | Markets, Competition & Spectrum Branch | Communications Infrastructure Division | Department of Infrastructure, Transport, Regional Development, Communications, Sport & The Arts  
+61 2 s22(1)(a)(ii) | +61 s22(1)(a)(ii) | s22(1)(a)(ii)@infrastructure.gov.au

I would like to acknowledge the traditional custodians of this land on which we meet, work and live. I recognise and respect their continuing connection to the land, waters and communities. I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.

LGBTIQ+ Ally

OFFICIAL: Sensitive // Personal-Privacy

-----Original Message-----

From: s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>

Sent: 03 November 2025 14:31

To: s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>; s22(1)(a)(ii)

<s22(1)(a)(ii)@infrastructure.gov.au>

Subject: RE: Concern over Inability to call 000 [SEC=OFFICIAL:Sensitive, ACCESS=Personal-Privacy]

OFFICIAL: Sensitive // Personal-Privacy

Hi both - just fyi we've written to this customer before and have sought advice from Telstra. See attached.

s22(1)(a)(ii)

OFFICIAL: Sensitive // Personal-Privacy

-----Original Message-----

From: s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>

Sent: 03 November 2025 14:23

To: s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>

Cc: s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>

Subject: FW: Concern over Inability to call 000 [SEC=OFFICIAL]

OFFICIAL

Hi s22(1)(a)(ii)

MO has requested that we call this constituent. Suggest calling just to get some facts from him and then refer to Telstra for advice.

Thanks

s22(1)(a)

s22(1)(a)(ii)

Director | Markets & Competition | Markets, Competition & Spectrum Branch | Communications Infrastructure Division | Department of Infrastructure, Transport, Regional Development, Communications, Sport & The Arts  
+61 2 s22(1)(a)(ii) | +61 s22(1)(a)(ii) | s22(1)(a)(ii)@infrastructure.gov.au

I would like to acknowledge the traditional custodians of this land on which we meet, work and live. I recognise and respect their continuing connection to the land, waters and communities. I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.

LGBTIQ+ Ally

OFFICIAL

-----Original Message-----

From: DLO Wells <DLO.Wells@mo.communications.gov.au>

Sent: 03 November 2025 14:19

To: s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>

Subject: FW: Concern over Inability to call 000 [SEC=OFFICIAL]

OFFICIAL

OFFICIAL

FYI

OFFICIAL

OFFICIAL

-----Original Message-----

From: s22(1)(a)(ii) <s22(1)(a)(ii)@mo.communications.gov.au>

Sent: Monday, 3 November 2025 1:03 PM

To: Minister.wells <Minister.wells@mo.communications.gov.au>

Cc: DLO Wells <DLO.Wells@mo.communications.gov.au>

Subject: RE: Concern over Inability to call 000 [SEC=OFFICIAL]

OFFICIAL

OFFICIAL

Can someone from the department call on Min's behalf pls. Sounds like a 3G switch off issue.

OFFICIAL

OFFICIAL

-----Original Message-----

From: Minister.wells <Minister.wells@mo.communications.gov.au>

Sent: Monday, 3 November 2025 7:59 AM

To: s22(1)(a)(ii) <s22(1)(a)(ii)@mo.communications.gov.au>

Cc: DLO Wells <DLO.Wells@mo.communications.gov.au>

Subject: FW: Concern over Inability to call 000 [SEC=OFFICIAL]

OFFICIAL

OFFICIAL

Hi s22(1)(a)

Please see the below email for your review.

Thanks,

s22(1)(a)

OFFICIAL

OFFICIAL

-----Original Message-----


From: s47F@hotmai.com>

Sent: Friday, 31 October 2025 9:16 PM

To: Minister.wells <Minister.wells@mo.communications.gov.au>

Subject: Concern over Inability to call 000

s22(1)(a)(ii)



Released under the Freedom of Information Act by the Department of  
Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

s22(1)(a)(ii)

**From:** Irwin, Andrew  
**Sent:** Tuesday, 4 November 2025 6:06 PM  
**To:** s22(1)(a)(ii)  
**Cc:** s22(1)(a)(ii) s22(1)(a)(ii)  
**Subject:** Re: Concern over Inability to call 000 [SEC=OFFICIAL:SENSITIVE, ACCESS=Personal-Privacy]

OFFICIAL: Sensitive // Personal-Privacy

OFFICIAL: SENSITIVE  
 Personal privacy

Thanks, I think at the end just put 'we will follow up with the ACMA' then good to go

OFFICIAL: Sensitive // Personal-Privacy

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>  
**Date:** Tuesday, 4 November 2025 at 4:55:14 pm  
**To:** "Irwin, Andrew" <Andrew.Irwin@infrastructure.gov.au>  
**Cc:** "Irwin, Andrew" <Andrew.Irwin@infrastructure.gov.au>, s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>, s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>  
**Subject:** FW: Concern over Inability to call 000 [SEC=OFFICIAL:Sensitive, ACCESS=Personal-Privacy]

OFFICIAL: Sensitive // Personal-Privacy

Hi Andrew, can you please review the email below to the DLO about a constituent concern. s22(1)(a)(iii) called him at the MO's request.

s22(1)(a)

OFFICIAL: Sensitive // Personal-Privacy

Hi s22(1)(a)(iii)

An officer from the Department spoke with s47F on 3 November 2025. During the call s47F conveyed several concerns, s22(1)(a)(ii)

He alleges there was a failed 000 call in the area late last year that ACMA is aware of. He also noted that there was a fire in the area in November 2024 where people had to evacuate and alleges that access to 000 was limited. s22(1)(a)(ii)

s22(1)(a)(ii)

Regarding the allegedly failed Triple Zero call, the ACMA requested s47F to provide further details.

I hope this is of assistance,

s22(1)(a)(ii)

s22(1)(a)(ii)

Director | Markets & Competition | Markets, Competition & Spectrum Branch | Communications Infrastructure Division | Department of Infrastructure, Transport, Regional Development, Communications, Sport & The Arts  
+61 2 s22(1)(a)(ii) | +61 s22(1)(a)(ii) | s22(1)(a)(ii) infrastructure.gov.au

I would like to acknowledge the traditional custodians of this land on which we meet, work and live. I recognise and respect their continuing connection to the land, waters and communities. I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.

LGBTIQ+ Ally

OFFICIAL: Sensitive // Personal-Privacy

OFFICIAL

OFFICIAL: Sensitive // Personal-Privacy

-----Original Message-----

From: DLO Wells <DLO.Wells@mo.communications.gov.au>

Sent: 03 November 2025 14:19

To: s22(1)(a)(ii) <s22(1)(a)(ii) INFRASTRUCTURE.gov.au>

Subject: FW: Concern over Inability to call 000 [SEC=OFFICIAL]

s22(1)(a)(ii) - duplicate email chain - refer Document 14 above

s22(1)(a)(ii)

**From:** DLO Wells  
**Sent:** Wednesday, 5 November 2025 1:21 PM  
**To:** s22(1)(a)(ii)  
**Cc:** s22(1)(a)(ii) s22(1)(a)(ii) Irwin, Andrew; DLO Wells  
**Subject:** RE: Concern over Inability to call 000 [SEC=OFFICIAL]

OFFICIAL

OFFICIAL

Hi s22(1)(a)

Many thanks to you and the team for making the call to s47F and for the detail provided below.

I've passed this onto s22(1)(a)(ii) for his consideration. If he requests further action, I will let you know.

Please continue following up with the ACMA.

Kind regards,

s22(1)(a)

s22(1)(a)(ii)

Department Liaison Officer • Office of the Hon Anika Wells MP • Minister for Communications and Minister for Sport

[DLO.Wells@mo.communications.gov.au](mailto:DLO.Wells@mo.communications.gov.au)

M +61 s22(1)(a)(ii)

GPO Box 594 Canberra, ACT 2601

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

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[infrastructure.gov.au](http://infrastructure.gov.au)



*I would like to acknowledge the traditional custodians of this land on which we meet, work and live.*

*I recognise and respect their continuing connection to the land, waters and communities.*

*I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.*

OFFICIAL

OFFICIAL

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)> INFRASTRUCTURE.gov.au>  
**Sent:** Wednesday, 5 November 2025 9:24 AM  
**To:** DLO Wells <DLO.Wells@mo.communications.gov.au>  
**Cc:** s22(1)(a)(ii) <s22(1)(a)(ii)> infrastructure.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)> infrastructure.gov.au>; Irwin, Andrew <Andrew.Irwin@infrastructure.gov.au>  
**Subject:** FW: Concern over Inability to call 000 [SEC=OFFICIAL:SENSITIVE, ACCESS=Personal-Privacy]

OFFICIAL: Sensitive // Personal-Privacy

Hi <sup>s22(1)(a)</sup>

An officer from the Department spoke with <sup>s47F</sup> on 3 November 2025. During the call <sup>s47F</sup> conveyed several concerns, <sup>s22(1)(a)(ii)</sup>

He alleges there was a failed 000 call in the area late last year that ACMA is aware of. He also noted that there was a fire in the area in November 2024 during which people had to evacuate and alleges that access to 000 was limited.

<sup>s22(1)(a)(ii)</sup>

<sup>s22(1)(a)(ii)</sup>. Regarding the allegedly failed Triple Zero call, the ACMA requested <sup>s47F</sup> to provide further details.

We will follow up with the ACMA.

I hope this is of assistance,

<sup>s22(1)(a)(ii)</sup>

<sup>s22(1)(a)(ii)</sup>

Director | Markets & Competition | Markets, Competition & Spectrum Branch | Communications Infrastructure Division | Department of Infrastructure, Transport, Regional Development, Communications, Sport & The Arts  
+61 2 <sup>s22(1)(a)(ii)</sup> | +61 <sup>s22(1)(a)(ii)</sup> | <sup>s22(1)(a)(ii)</sup> [infrastructure.gov.au](https://infrastructure.gov.au)

I would like to acknowledge the traditional custodians of this land on which we meet, work and live. I recognise and respect their continuing connection to the land, waters and communities. I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.

LGBTIQ+ Ally

OFFICIAL: Sensitive // Personal-Privacy

OFFICIAL

OFFICIAL: Sensitive // Personal-Privacy



**OFFICIAL: Sensitive // Personal-Privacy**

-----Original Message-----


From: DLO Wells <[DLO.Wells@mo.communications.gov.au](mailto:DLO.Wells@mo.communications.gov.au)>

Sent: 03 November 2025 14:19

To: s22(1)(a)(ii) <s22(1)(a)(ii) [INFRASTRUCTURE.gov.au](mailto:INFRASTRUCTURE.gov.au)>

Subject: FW: Concern over Inability to call 000 [SEC=OFFICIAL]

s22(1)(a)(ii) - duplicate email chain - refer Document 14 above



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

s22(1)(a)(ii)

**From:** s22(1)(a)(ii)  
**Sent:** Thursday, 13 November 2025 12:21 PM  
**To:** s22(1)(a)(ii)  
**Cc:** s22(1)(a)(ii)  
**Subject:** Re: s47F Emails [SEC=OFFICIAL:Sensitive, CAVEAT=SH:NATIONAL-CABINET, ACCESS=Personal-Privacy]

OFFICIAL: Sensitive // NATIONAL CABINET // Personal-Privacy

OFFICIAL: Sensitive // Personal-Privacy

s22(1)(a)(ii) - see below updated email to s47F :

OFFICIAL: Sensitive // NATIONAL CABINET // Personal-Privacy

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>  
**Sent:** Thursday, November 13, 2025 09:45  
**To:** s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>  
**Cc:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>  
**Subject:** Re: s47F Emails [SEC=OFFICIAL:Sensitive, CAVEAT=SH:NATIONAL-CABINET, ACCESS=Personal-Privacy]

OFFICIAL: Sensitive // Personal-Privacy

s22(1)(a)(ii) - let me know if you're happy with this.

OFFICIAL: Sensitive // Personal-Privacy

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>  
**Sent:** Monday, November 10, 2025 11:58  
**To:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>  
**Subject:** RE: s47F Emails [SEC=OFFICIAL:Sensitive, CAVEAT=SH:NATIONAL-CABINET, ACCESS=Personal-Privacy]

OFFICIAL: Sensitive // NATIONAL CABINET // Personal-Privacy

Thanks, s22(1)(a)(ii) – slight edit in red below. Happy for you to send, pending clearance from s22(1)(a)(ii)

s22(1)(a)(ii)

OFFICIAL: Sensitive // NATIONAL CABINET // Personal-Privacy

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>  
**Sent:** Monday, 10 November 2025 11:39 AM  
**To:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>  
**Subject:** s47F Emails [SEC=OFFICIAL:Sensitive, CAVEAT=SH:NATIONAL-CABINET, ACCESS=Personal-Privacy]

**OFFICIAL: Sensitive // NATIONAL CABINET // Personal-Privacy**

Hi both, am attaching all the emails s47F has sent to the 3G Switch Off inbox.

See also below an email I drafted in response to him. If you're okay with it, I'll send.

s47F


s22(1)(a)(ii)

s22(1)(a)(ii)

*In terms of access to emergency services, Australian telcos have a legal responsibility to ensure access to Triple Zero is maintained, especially during a network outage.* s22(1)(a)(ii)

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s22(1)(a)(ii)



*Kind regards,*

xxx

OFFICIAL: Sensitive // NATIONAL CABINET // Personal-Privacy

OFFICIAL: Sensitive // Personal-Privacy

Released under the Freedom of Information Act by the Department of  
Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

s22(1)(a)(ii)

**From:** CHAPPLE, Clare <Clare.Chapple@infrastructure.gov.au>  
**Sent:** Thursday, 13 November 2025 2:01 PM  
**To:** Cathy Rainsford  
**Cc:** Office of the Chair; CHISHOLM, James; Silleri, Kathleen; Fogarty, Chris; s22(1)(a)(ii)  
**Subject:** TZ Custodian - letter re immediate work priorities  
**Attachments:** 20251113 - Triple Zero Custodian to ACMA - 13 November.pdf

OFFICIAL

Hi Cath

As flagged, please find attached a letter from the Custodian outlining our immediate work priorities over the next 3-6 months. As you will see, many of these are already in train, and I look forward to working with you and your team to make significant progress over the coming months to build confidence in an effective Triple Zero ecosystem.

Cheers

Clare

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

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

Ms Cathy Rainsford  
General Manager Consumer Division  
Australian Communications and Media Authority

13 November 2025

  
Dear Ms Rainsford

I am writing to provide you with an overview of the immediate work priorities of the Triple Zero Custodian (the Custodian) which my division will be progressing over the coming months. The Custodian will seek assistance from the Australian Communications and Media Authority (ACMA) in actioning these key priorities, some of which may form the basis of formal requests from the Custodian to the ACMA to make an Emergency Call Service (ECS) direction.

**Device compliance**

Over the coming months, the Custodian will have a primary focus on improving the visibility of the compliance status of mobile phones for sale in the Australian market. The software configuration issue identified by Telstra affecting some older Samsung mobile phone models and their ability to access Triple Zero has called attention to the need for improved transparency between device manufacturers, carriers and consumers.

As mentioned in initial discussions between the Custodian and the ACMA, the Custodian is investigating the regulatory changes required to establish a device compliance database and an accompanying assurance regime. The database would provide visibility of the emergency call capability status of devices, providing a record of relevant technical specifications and compliance verification documentation. As you may be aware, other jurisdictions have similar databases, including in the United States and Canada. The Custodian's position is that establishing a similar database in Australia would provide carriers with an improved understanding of how mobile phones can be expected to operate on different networks and will provide greater clarity to carriers on the devices they are required to block under the Telecommunications (Emergency Call Service) Determination 2019 (ECSD). The database would also provide greater transparency for consumers on the ability of their devices to call Triple Zero, particularly for those who have purchased their devices outside of Australia or via grey markets.

As you are aware, the Minister for Communications the Hon Anika Wells MP has written to Ms Nerida O'Loughlin PSM (the Chair) on the practical considerations required to implement such a database. The Custodian awaits the Chair's practical advice, which may help form the basis of a Ministerial Direction under 14(1) of the *Australian Communications and Media Authority Act 2005* on the matter.

OFFICIAL



**OFFICIAL****Notification requirements regarding access to the emergency call service**

The Custodian is considering what regulatory actions could be undertaken to require carriers to notify relevant stakeholders in the event of a disruption to the emergency call service. The public scrutiny following the Optus September outage highlighted the need for requirements for carriers to notify the ACMA, the department, and others about dropped calls to Triple Zero.

While the Telecommunications (Customer Communications for Outages) Industry Standard 2024 and the ECSD provide sufficient clarity around the requirements on carriers with respect to Significant Local Outages as well as Major Outages, the Custodian is looking to progress work that would require carriers to appropriately notify relevant stakeholders on disruptions to the Triple Zero service. This reflects potential gaps in the current regulatory regime as raised in the recent Senate Inquiry into the Optus Triple Zero outage of September 2025. This would align with the work ACMA is progressing to develop and issue guidance to industry on the required content and standardised format of outage notifications, as discussed at Exercise Disconnect in Canberra on 20 October 2025.

**Transparency of information held by the Emergency Call Person (ECP)**

Initial information sought from carriers by the Custodian highlights a lack of transparency between the ECP and other stakeholders in the Triple Zero ecosystem. The Custodian is considering available options to require Telstra, as the ECP, to proactively act on and notify relevant stakeholders of any known or suspected impact on calls to the emergency call service when aware of issues impacting the ecosystem they become aware of them. The work currently being undertaken by the Custodian could be progressed alongside the regulatory updates to the ECSD or through a Custodian-requested ECS Direction to Telstra as the ECP.

**Mutual assistance arrangements**

As you may be aware, Optus has not shared the network error codes relevant to the September outage with others in the industry, even though such information, even if caveated and noting that details could change, might help prevent future disruptions to the emergency call service. There are currently no requirements on carriers and ECP to cooperate with each other during crisis times for one or all the networks.

The Custodian is considering options available to compel (or even promote) carriers, as well as the ECP, to enter into mutual assistance agreements to collectively act on and notify each other of any known impact or suspected impact on calls to Triple Zero regardless of the network the call is being carried on. This would mitigate miscommunication and improve overall awareness and responsiveness in the Triple Zero ecosystem, aligning with Recommendation 15 in the Review into the Optus outage of 8 November 2023 (the Review).

**Regular network upgrades and testing**

The September 2025 Optus outage incident has highlighted that network upgrade procedures may have adverse impacts on the ability for customers to access the emergency call service. In September, information provided to the Custodian from Telstra and TPG Telecom on processes and procedures in their respective organisations, including network testing, highlighted that each carrier has their own testing methods, and that the frequency and type of testing vary across organisations.

It is the Custodian's position that regular audited testing will provide assurance of uncertainties and increased preparedness for future incidents. The Custodian is considering requesting the ACMA to amend regulations to require telcos to undertake network upgrade testing at regular intervals of 6-months, as per Recommendation 3 in the Review, and to establish a certification regime to support this.

**Welfare checks procedures**

As discussed during Exercise Disconnect there are widely disparate processes and triggers for conducting welfare checks among carriers. Additionally, some telcos have limited interaction with the ECP, as well as vague escalation procedures.

The Custodian will continue to seek information from the carriers on their welfare check processes and procedures as part of its immediate work plan. The Custodian is also considering options for the ACMA to

OFFICIAL

amend and strengthen requirements in the Emergency Call Service Determination 2019 (ECSD) around welfare checks and would be interested in the ACMA's views on the matter.

**Next steps**

The Custodian intends to engage with the ACMA as these six work areas develop and welcomes your views on any practical considerations needing to be addressed for their actioning, including around the level of officer-to-officer relations between our organisations. We would particularly welcome your views on whether the ACMA would require a Ministerial direction to progress with any of the six work areas.

Yours sincerely  
s22(1)(a)(ii)

**Clare Chapple**  
First Assistant Secretary  
Triple Zero Custodian Division

OFFICIAL



s22(1)(a)(ii)

**From:** s22(1)(a)(ii)  
**Sent:**  
**To:**  
**Subject:**  
**Attachments:** Media release - TPG Telecom Statement on Triple Zero Incident.pdf

OFFICIAL

OFFICIAL

**From:** s47F <s47F@tpgtelecom.com.au>  
**Sent:** Tuesday, 18 November 2025 9:27 AM  
**To:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>  
**Cc:** Silleri, Kathleen <Kathleen.Silleri@infrastructure.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>; Cathy Rainsford <cathy.rainsford@acma.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@acma.gov.au>; s47F <s47F@tpgtelecom.com.au>  
**Subject:** RE: advice from TPG [SEC=OFFICIAL]

You don't often get email from s47F <s47F@tpgtelecom.com.au>. [Learn why this is important](#)

OFFICIAL

Hello s22(1)(a)(ii)

Details I have at present are:

s47G(1)(a), s47G(1)(b)

s47G(1)(a), s47G(1)(b)

We will advise as more details come to hand.

Regards,

s47F

Head of Regulatory

Mobile: +61 s47F

Email: s47F [tpgtelecom.com.au](mailto:tpgtelecom.com.au)

TPG Telecom (ASX: TPG)



I acknowledge the Traditional Custodians of the lands on which I work and reside, the Darug Peoples, and I pay my respects to their Elders, past, present, and emerging.

Confidential

Highly Sensitive

OFFICIAL

From: s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>

Sent: Tuesday, 18 November 2025 8:43 AM

To: s47F <s47F@tpgtelecom.com.au>

Cc: Silleri, Kathleen <Kathleen.Silleri@infrastructure.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>

**Subject:** advice from TPG [SEC=OFFICIAL]

**Importance:** High

**ALERT:** This email originated outside TPG Telecom's network. If you do not recognise the sender or did not expect this email then please do not open any attachments or click any link.

OFFICIAL

OFFICIAL

Hi [REDACTED]

I am following up on the advice you provided Kath last night at 10.30pm regarding an incident involving failed calls to Triple zero, and passed onto TPG from the ECP.

We are seeking some additional information please.

Can you advise whether the caller who eventually got through to the ambulance service used another number (not 000) or used another (different ) device to that which couldn't get through.

We would like to know the make and model of the device that couldn't get through to Triple Zero and would appreciate a quick response in order to brief appropriately

Thanks

[REDACTED]  
[REDACTED]

[REDACTED]

Director Triple Zero and Regulatory Reform • Custodian Operations Branch

[REDACTED] [infrastructure.gov.au](https://infrastructure.gov.au)

P 02 6136 [REDACTED]  
[REDACTED]

GPO Box 594 Canberra, ACT 2601

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*I would like to acknowledge the traditional custodians of this land on which we meet, work and live.  
I recognise and respect their continuing connection to the land, waters and communities.*

OFFICIAL

OFFICIAL

s22(1)(a)(ii)

**From:** s22(1)(a)(ii)  
**Sent:** Tuesday, 18 November 2025 11:19 AM  
**To:** s22(1)(a)(ii)  
**Subject:** RE: wentworth falls Triple Zero call matter [SEC=OFFICIAL]

Cheers thanks

s22(1)(a)(ii)

Director | Markets & Competition | Markets, Competition & Spectrum Branch | Communications Infrastructure Division | Department of Infrastructure, Transport, Regional Development, Communications, Sport & The Arts  
 +61 2 s22(1)(a) | +61 s22(1)(a)(ii) | s22(1)(a)(ii) [infrastructure.gov.au](mailto:s22(1)(a)(ii)@infrastructure.gov.au)  
 I would like to acknowledge the traditional custodians of this land on which we meet, work and live. I recognise and respect their continuing connection to the land, waters and communities. I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.  
 LGBTQ+ Ally

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>  
**Sent:** 18 November 2025 11:15  
**To:** s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>  
**Subject:** RE: wentworth falls Triple Zero call matter [SEC=OFFICIAL]

OFFICIAL

Thanks s22(1)(a)(ii) – I think Kath is going to speak with Liz Quinn today so she will probably raise it. I'll pass on any updates we get.

OFFICIAL

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>  
**Sent:** Tuesday, 18 November 2025 10:32 AM  
**To:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>  
**Subject:** RE: wentworth falls Triple Zero call matter [SEC=OFFICIAL]

OFFICIAL

Hey s22(1)(a)(ii) - No, I've not heard anything.

s22(1)(a)(ii)

Director | Markets & Competition | Markets, Competition & Spectrum Branch | Communications Infrastructure Division | Department of Infrastructure, Transport, Regional Development, Communications, Sport & The Arts  
 +61 2 s22(1)(a) | +61 s22(1)(a)(ii) | s22(1)(a)(ii) [infrastructure.gov.au](mailto:s22(1)(a)(ii)@infrastructure.gov.au)  
 I would like to acknowledge the traditional custodians of this land on which we meet, work and live. I recognise and respect their continuing connection to the land, waters and communities. I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.  
 LGBTQ+ Ally

OFFICIAL

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>  
**Sent:** 18 November 2025 10:28  
**To:** s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>  
**Subject:** FW: wentworth falls Triple Zero call matter [SEC=OFFICIAL]

OFFICIAL

Hi s22(1)(a)(ii)

Hope you are well. Just wondering if the ACMA has provided you with an update on the following Wentworth Falls investigation? We haven't heard anything but I thought I'd reach out just in case we'd dropped on the chain.

Cheers,

s22(1)(a)(ii)

OFFICIAL

OFFICIAL

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**From:** Elizabeth Quinn <[elizabeth.quinn@acma.gov.au](mailto:elizabeth.quinn@acma.gov.au)>  
**Sent:** Thursday, 2 October 2025 10:43 AM  
**To:** Irwin, Andrew <[Andrew.Irwin@infrastructure.gov.au](mailto:Andrew.Irwin@infrastructure.gov.au)>; Tanya Farrell <[Tanya.Farrell@acma.gov.au](mailto:Tanya.Farrell@acma.gov.au)>  
**Cc:** CHISHOLM, James <[James.CHISHOLM@infrastructure.gov.au](mailto:James.CHISHOLM@infrastructure.gov.au)>; Grunhard, Samuel <[Samuel.Grunhard@COMMUNICATIONS.gov.au](mailto:Samuel.Grunhard@COMMUNICATIONS.gov.au)>; LA RANCE, Lisa <[Lisa.LARance@infrastructure.gov.au](mailto:Lisa.LARance@infrastructure.gov.au)>; s22(1)(a)(ii) <s22(1)(a)(ii) [INFRASTRUCTURE.gov.au](mailto:INFRASTRUCTURE.gov.au)>; Silleri, Kathleen <[Kathleen.Silleri@infrastructure.gov.au](mailto:Kathleen.Silleri@infrastructure.gov.au)>; Paul Nicholas <[Paul.Nicholas@acma.gov.au](mailto:Paul.Nicholas@acma.gov.au)>  
**Subject:** RE: wentworth falls Triple Zero call matter [SEC=OFFICIAL]

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Hi Andrew,  
 This is under active consideration and we will be in touch when we have an update.  
 Thanks,  
 Liz

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---

**From:** Irwin, Andrew <[Andrew.Irwin@infrastructure.gov.au](mailto:Andrew.Irwin@infrastructure.gov.au)>  
**Sent:** Thursday, 2 October 2025 10:39 AM  
**To:** Elizabeth Quinn <[elizabeth.quinn@acma.gov.au](mailto:elizabeth.quinn@acma.gov.au)>; Tanya Farrell <[Tanya.Farrell@acma.gov.au](mailto:Tanya.Farrell@acma.gov.au)>  
**Cc:** CHISHOLM, James <[James.CHISHOLM@infrastructure.gov.au](mailto:James.CHISHOLM@infrastructure.gov.au)>; Grunhard, Samuel <[Samuel.Grunhard@COMMUNICATIONS.gov.au](mailto:Samuel.Grunhard@COMMUNICATIONS.gov.au)>; LA RANCE, Lisa <[Lisa.LARance@infrastructure.gov.au](mailto:Lisa.LARance@infrastructure.gov.au)>; s22(1)(a)(ii) <s22(1)(a)(ii) [INFRASTRUCTURE.gov.au](mailto:INFRASTRUCTURE.gov.au)>; Silleri, Kathleen <[Kathleen.Silleri@infrastructure.gov.au](mailto:Kathleen.Silleri@infrastructure.gov.au)>  
**Subject:** RE: wentworth falls Triple Zero call matter [SEC=OFFICIAL]

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Hi Elizabeth and Tanya,

I am writing to follow up on the matter raised by Shanyn Sparreboom in her email below, s47G(1)(a), s47G(1)(b)

s47G(1)(a), s47G(1)(b)

It is concerning to the Department that a range of end users could be continuing to use handsets that cannot call Triple Zero despite the regulatory changes that were made in preparation for the 3G switch off. It is conceivable that other less technologically literate, and potentially vulnerable, Australians may be in a similar position of having failed to make updates to the handset in response to messages from their telco.

Thanks

Andrew

#### Andrew Irwin (he/him)

Assistant Secretary • Markets, Competition and Spectrum Branch • Communications Infrastructure Division

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

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s22(1)(a)(ii)

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*I recognise and respect their continuing connection to the land, waters and communities.*

*I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.*

**Ngunnawal Country**

 LGBTI Ally

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**From:** Sparreboom, Shanyn <[shanyn.sparreboom@infrastructure.gov.au](mailto:shanyn.sparreboom@infrastructure.gov.au)>  
**Sent:** Friday, 26 September 2025 3:20 PM  
**To:** [elizabeth.quinn@acma.gov.au](mailto:elizabeth.quinn@acma.gov.au); [tanya.farrell@acma.gov.au](mailto:tanya.farrell@acma.gov.au)  
**Cc:** CHISHOLM, James <[James.CHISHOLM@infrastructure.gov.au](mailto:James.CHISHOLM@infrastructure.gov.au)>; Grunhard, Samuel <[Samuel.Grunhard@COMMUNICATIONS.gov.au](mailto:Samuel.Grunhard@COMMUNICATIONS.gov.au)>; LA RANCE, Lisa <[Lisa.LARance@infrastructure.gov.au](mailto:Lisa.LARance@infrastructure.gov.au)>; Irwin, Andrew <[Andrew.Irwin@infrastructure.gov.au](mailto:Andrew.Irwin@infrastructure.gov.au)>; §22(1)(a)(ii) <§22(1)(a)(ii)@INFRASTRUCTURE.gov.au>; Silleri, Kathleen <[Kathleen.Silleri@infrastructure.gov.au](mailto:Kathleen.Silleri@infrastructure.gov.au)>  
**Subject:** FW: wentworth falls Triple Zero call matter [SEC=OFFICIAL]  
**Importance:** High


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Hi Elizabeth and Tanya

We have become aware that a Vodafone customer tried to call Triple Zero on their phone but the call did not go through. After discussions with TPG (s47F) and Telstra (s47F), the following has been ascertained:

s47G(1)(a), s47G(1)(b)



The information points to a problem with the device as the device cannot call Triple Zero. We ask that ACMA consider:

- whether this is a breach of the ECS Determination – given the person can make other calls but not Triple Zero calls;
- the extent to which there are other devices in this category – if MNOs are sending messages to customers to update software then they would have knowledge of impacted customers and devices;
- what action should be taken by MNOs with respect to these customers; and
- if it is not a breach whether changes need to be made to the ECS Determination.

We would be grateful if the ACMA could keep the department informed of its consideration of this issue. We are deeply concerned that there may be devices that cannot call Triple Zero in the market.

For completeness, below is the email trail of information gathered after we heard about the incident for completeness. We have informed the Minister's Office.

Kind regards  
 Shanyn

**Shanyn Sparreboom**

A/g First Assistant Secretary • Communications Infrastructure Division

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**From:** Grunhard, Samuel <[Samuel.Grunhard@COMMUNICATIONS.gov.au](mailto:Samuel.Grunhard@COMMUNICATIONS.gov.au)>**Sent:** Friday, 26 September 2025 2:22 PM**To:** Kerdel, Barnaby (A. Wells, MP) <[Barnaby.Kerdel@aph.gov.au](mailto:Barnaby.Kerdel@aph.gov.au)>; Kerdel, Barnaby<[Barnaby.Kerdel@mo.communications.gov.au](mailto:Barnaby.Kerdel@mo.communications.gov.au)>**Cc:** s22(1)(a)(ii) <s22(1)(a)(ii) [mo.communications.gov.au](mailto:mo.communications.gov.au)>; CHISHOLM, James<[James.CHISHOLM@infrastructure.gov.au](mailto:James.CHISHOLM@infrastructure.gov.au)>; Silleri, Kathleen <[Kathleen.Silleri@infrastructure.gov.au](mailto:Kathleen.Silleri@infrastructure.gov.au)>; Sparreboom, Shanyn <[shanyn.sparreboom@infrastructure.gov.au](mailto:shanyn.sparreboom@infrastructure.gov.au)>**Subject:** RE: wentworth falls Triple Zero call matter [SEC=OFFICIAL]

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Barnaby, I called s47F at TPG for an update on this matter.

s47G(1)(a), s47G(1)(b)

I will pass this information on to the ACMA lest there be regulatory implications. I am unclear whether the device should or should not have been blocked under the Determination. We will also explore whether broader industry messaging is required.

Sam

**Sam Grunhard**



First Assistant Secretary  
 Communications Services and Consumer Division  
 Communications and Media Group

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From: Grunhard, Samuel <[Samuel.Grunhard@COMMUNICATIONS.gov.au](mailto:Samuel.Grunhard@COMMUNICATIONS.gov.au)>  
 Sent: Wednesday, 24 September 2025 5:03 PM  
 To: Kerdel, Barnaby (A. Wells, MP) <[Barnaby.Kerdel@aph.gov.au](mailto:Barnaby.Kerdel@aph.gov.au)>; Kerdel, Barnaby  
 <[Barnaby.Kerdel@mo.communications.gov.au](mailto:Barnaby.Kerdel@mo.communications.gov.au)>  
 Cc: s22(1)(a)(ii) <s22(1)(a)(ii) [mo.communications.gov.au](mailto:mo.communications.gov.au)>; CHISHOLM, James  
 <[James.CHISHOLM@infrastructure.gov.au](mailto:James.CHISHOLM@infrastructure.gov.au)>; Silleri, Kathleen <[Kathleen.Silleri@infrastructure.gov.au](mailto:Kathleen.Silleri@infrastructure.gov.au)>  
 Subject: wentworth falls Triple Zero call matter [SEC=OFFICIAL]

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Hi Barnaby,

An update on this matter reported earlier today:

- s47F s47G(1)(a), s47G(1)(b)
- s47G(1)(a), s47G(1)(b)
- Further from Telstra – s47F no evidence of a camp-on from that IMEI number (so camp-on did not occur). Call volumes from Vodafone otherwise appear normal and are coming through as would be expected. Can see the phone was otherwise active. Nothing else Telstra can really tell us – s47G(1)(a), s47G(1)(b).

The ACMA is aware.

Sam

**Sam Grunhard**

a/g Deputy Secretary

Communications and Media Group

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EA: s22(1)(a)(ii) • E: s22(1)(a)(ii) [@communications.gov.au](mailto:s22(1)(a)(ii)@communications.gov.au) • P +61 2 s22(1)(a)(ii)**Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts****CONNECTING AUSTRALIANS • ENRICHING COMMUNITIES • EMPOWERING REGIONS**[infrastructure.gov.au](http://infrastructure.gov.au)

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