

FOI

From: Grunhard, Samuel
Sent: Wednesday, 24 September 2025 4:44 PM
To: Kerdel, Barnaby (A. Wells, MP); Kerdel, Barnaby
Cc: CHISHOLM, James; Silleri, Kathleen; s22(1)(a)(ii)
Subject: custodian points [SEC=OFFICIAL]

OFFICIAL

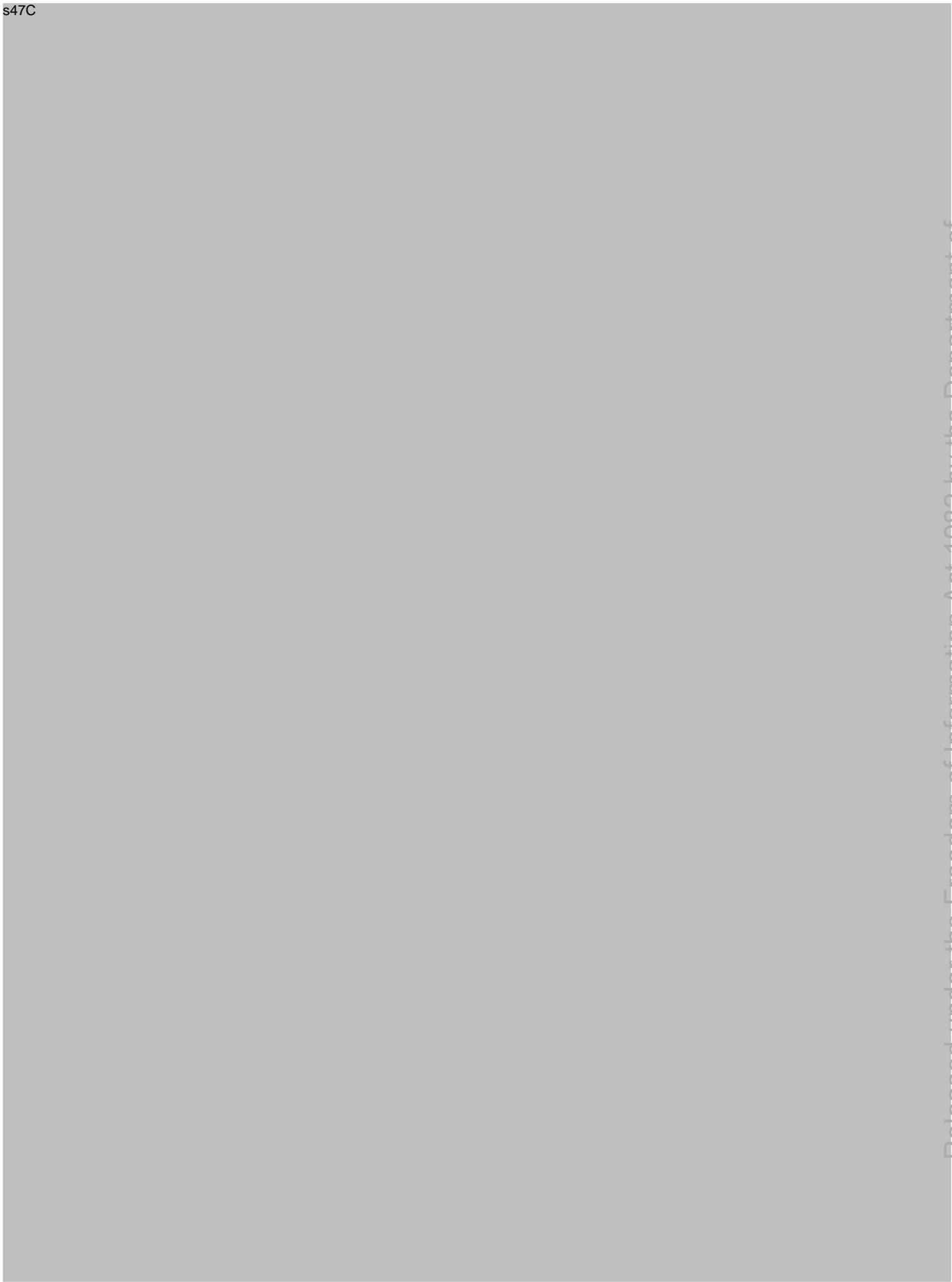
Hi Barnaby,

s47C



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Sam Grunhard

a/g Deputy Secretary

Communications and Media Group

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

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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.
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Sent: Wednesday, 24 September 2025 5:03 PM
To: Kerdel, Barnaby (A. Wells, MP); Kerdel, Barnaby
Cc: s22(1)(a)(ii) CHISHOLM, James; Silleri, Kathleen
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

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Sent: Wednesday, 24 September 2025 5:31 PM
To: Kerdel, Barnaby (A. Wells, MP); Kerdel, Barnaby
Cc: s22(1)(a)(ii); CHISHOLM, James; s22(1)(a)(ii); s22(1)(a)(ii); McMullan, Kate; Sillieri, Kathleen;
 Media
Subject: RE: Optus sitrep - 5pm 24 Sept [SEC=OFFICIAL]
Attachments: Optus sitrep 5pm 24 Sept.docx

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Barnaby, updated sitrep as at 5pm 24 September. Propose discontinuing sitrep (as opposed to other response work still underway) noting we are unlikely to continue to learn information at pace about the incident itself. Let us know if you disagree.

Sam

Sam Grunhard

a/g Deputy Secretary
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From: Grunhard, Samuel
Sent: Monday, 22 September 2025 5:37 PM
To: Kerdel, Barnaby (A. Wells, MP) ; Kerdel, Barnaby
Cc: s22(1)(a)(ii) ; CHISHOLM, James ; s22(1)(a)(ii) ; s22(1)(a)(ii) ; McMullan, Kate ; Sillieri, Kathleen
Subject: Optus sitrep - 5pm 22 Sept [SEC=OFFICIAL]

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Hi Barnaby,

Please find attached updated sitrep. Next one tomorrow or as information unfolds.

Sam

Sam Grunhard

a/g Deputy Secretary

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OFFICIAL**Optus situation report – as at 5pm 24 September 2025 (updates highlighted)****Clearance: Sam Grunhard, a/g Deputy Secretary Communications and Media Group, DITRDCA****Facts / chronology**

- Optus advises that the outage was triggered when a system upgrade was started around 12.30am on Thursday 18 September. The upgrade was related to a firewall upgrade.
- The technical failure impacted 624 Triple Zero calls in SA, NT, WA, and two calls in NSW. The duration has been reported as between 10 and 14 hours.
 - On 22 September (1:20pm) Optus advised that it has identified an additional 7 calls (3 in SA, 4 in WA), taking the number to 631. These calls occurred between 12:17am and 12:30am. Welfare checks had not been undertaken but are being done now.
- On 24 September the Optus CEO said that of the 631 calls, some were ultimately able to get through to Triple Zero (including via camp-on) but 480 did not. Investigation is needed to determine the cause.
- Optus says that they and police services have since conducted welfare checks on all missed calls.
- On 21 September the Optus CEO said that Optus has now identified five calls to its call centres raising Triple Zero concerns, but these were not acted upon; internal escalation protocols failed. Optus says it has commenced “24/7” monitoring of its Triple Zero function.
- SA Police says it has since determined that an eight-week-old boy from Gawler West and a 68-year-old woman from the Adelaide suburb of Queenstown have died. SA Police now says the infant death is unlikely to have been caused by the outage.
- The Western Australian government confirmed a 74-year-old man has died, and another person may also have died as a result of the outage.
- State investigations will be held, including possible coronial proceedings.
- The Optus CEO said on 20 September that Optus will order an independent investigation into the incident.
- It is not yet clear precisely how the outage occurred, and why internal systems within Optus failed to act faster to restore services.
- Minister Wells announced on 20 September that the ACMA will be investigating the incident. On 22 September in a joint press conference with the Minister, the ACMA Chair announced that the ACMA’s investigation would focus on (1) the requirements in the Emergency Call Service Determination, (2) outage notification requirements, and (3) welfare check obligations. The ACMA will also consider ‘whether there has been sufficient investment in Optus’ network... and the systems and processes in place to alert Optus to when things are going wrong’.
- On 24 September the Optus board announced that Dr Kerry Schott has been appointed to run Optus’ ‘independent review’ into the incident.

Background**How does Triple Zero work?**

Triple Zero is delivered in coordination across the Australian Government and State and Territory Governments. The Australian Government provides and funds call centres that undertake the initial call answering, and then transfers genuine calls to the relevant police, fire or ambulance service in the appropriate state/territory. Telstra is required by law to provide Triple Zero services, and all telecommunications carriers are required to ensure that their customers’ calls are passed through to Triple Zero.

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Isn't there a system in place for all emergency calls to be carried even when the 'home' network is down?

Yes, this is called 'camp-on'. It enables mobile calls to be carried to Triple Zero even when the home network is down, by 'camping on' to another mobile network. It is not yet clear whether this system worked in this case, and if not, why not. This will form part of the ACMA's investigation. Optus informed the Department on 21 September by phone call that it is clear some calls did not successfully camp on, though the number of calls is TBD. Telstra has told the Department it is looking into its own data and will collaborate with Optus to understand what happened.

When was the Department notified of the Outage?

The Department has a dedicated email address which is used by the telcos to notify of outages. Optus notified at 2.45pm on 18 September of an issue affecting some customers attempting to call Triple Zero. At 2.52pm Optus advised that the matter was resolved and that up to 10 calls may have been impacted.

The Department was then contacted by the ACMA at 3.29pm on 19 September (the next day) to advise that Optus had experienced a 14 hour outage and over 600 calls were impacted.

What did the Bean Review into the 2023 Optus outage find? What action has the Government taken?

- Following the November 2023 Optus outage, the Department undertook a review of the incident to uncover the lessons for Government and the telecommunications industry from the outage, with the focus on the functioning of Triple Zero during the outage.
- The Review was led by Mr Richard Bean and provided a report, making 18 recommendations to the Minister for Communications in April 2024.
- All 18 recommendations were accepted by Government.
- Completed actions include:
 - Additional regulatory obligations on the telco industry around ensuring calls are carried to Triple Zero, including technical changes to network architecture.
 - Additional regulatory obligations on the telco industry around communicating to customers and government about when outages are occurring.
 - Establishment of a testing facility at the University of Technology Sydney to test mobile devices' ability to call Triple Zero in a range of scenarios, to implement a new mandatory testing code
- Ongoing actions include work to establish a Triple Zero Custodian to oversee the end to end operation of the Triple Zero ecosystem, and a review of the Triple Zero contract with Telstra.

Bean Review Recommendations

1	Articulating Obligations and Mandatory Wiling	Complete
2	Triple Zero Custodian Legislation to empower the custodian is currently being drafted.	Ongoing

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3	Mandatory Testing Code	With ACMA to register
4	Customer Device Information Code	With ACMA to register
5	Real Time Information Sharing	Complete
6	Outage Reporting	Complete
7	Combined Protocol Documents	Complete
8	ECP Contract Review. Negotiations with Telstra are in the final stages	Under negotiation
9	Protocol for Major Service Disruption Improvement	Complete
10	Customer Communications Standard	Complete
11	Education Initiative	Complete
12	Complaints Handling Standard	Complete
13	Standardised Resolutions Approach	Complete
14	Temporary Outage Roaming The Mobile Network Operators have been working on establishing the capability to enable temporary roaming. Testing is due to commence in November 2025.	Ongoing
15	Mutual Assistance Memorandum of Understanding Industry is considering this action in conjunction with recommendation 14.	Ongoing
16	Remote Access Code	Complete
17	Government Service Continuity	Complete
18	Joint Regulatory and Legislative Review This recommendation will be used to capture emerging matters not addressed in the previous recommendations.	Ongoing

Other recent outages of this type

- 30 June 2025 - [TPG warned for failure to comply with Triple Zero rules | ACMA](#)
 - ACMA issued a formal warning to TPG for failure to notify Telstra in a timely manner that an outage had affected emergency calls from its network.
 - ACMA found the TPG network failed between 12:40am and 2am on 15 August 2024.
 - The investigation found TPG did not notify Telstra until 9:07am.
 - The majority of Triple Zero calls made during the outage were able to camp-on to other networks.
- 4 June 2025 - [Telstra penalised for disruption to emergency call support service | ACMA](#)

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- ACMA fined Telstra \$18,780 for accidentally disabling connect to 106 emergency call relay service for 12 hours and 46 minutes between 5-6 July 2024.
- 11 December 2024 - [Telstra pays \\$3 million penalty for Triple Zero outage | ACMA](#)
 - ACMA fined Telstra just over \$3M for a technical disruption to Telstra's 000 emergency call centre, lasting 90 mins.
 - ACMA found 473 separate breaches of the rules governing Triple Zero
- 8 November 2024 - [Optus pays \\$12 million penalty for Triple Zero outage | ACMA](#)
 - ACMA fined Optus for a whole-of-network outage in November 2023 causing significant disruption to millions of Australians, leaving many without the ability to call Triple Zero.
 - ACMA found Optus failed to provide access to the emergency call service for 2,145 people during the course of the outage. Optus then failed to conduct 369 welfare checks on people who had tried to make an emergency call during the outage.

Information from the ACMA on its investigation and powers – all below information provided by the ACMA on 20 September

Investigation Focus

The ACMA will investigate Optus compliance with the following regulations:

- [Telecommunications \(Emergency Call Service\) Determination 2019](#)
- [Telecommunications \(Customer Communications for Outages\) Industry Standard 2024](#)
- [Industry Code C536: Emergency Call Service Requirements](#)

Telecommunications (Emergency Call Service) Determination 2019

The ECS Determination requires telcos to ensure that emergency calls are successfully carried to the Emergency Call Service.

The investigation will examine Optus compliance with:

- **Section 11- Networks** - requires carriers and carriage service providers (CSPs) to maintain, as far as practicable, the proper and effective functioning of their controlled networks and their controlled facilities that are used for the carriage of emergency calls to the Emergency Call Service.
- **Section 14 – Carriage service providers must ensure controlled networks and controlled facilities give access to end users** – requires the network to be configured to ensure end-users have access to emergency call services (this is a single breach provision).
- **Section 15** – requirement to give every end-user who makes an emergency call access to the Emergency Call Service (this section could have multiple breaches, one breach for each customer unable to connect to Triple Zero).
- **Section 19** –requires the CSP to ensure that that an emergency call made using the service is carried to the relevant termination point for the call (the relevant termination point in this case is the point of interconnect between the Optus network and the Telstra network for receipt of emergency calls).
- **Section 27 – Notification requirements – significant network outages** - CSPs experiencing a Significant Network Outage must, as soon as possible after becoming aware of the outage, notify, or arrange to notify the Emergency Call Person for 000 and 112, and the Emergency

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Call Person for 106; and each CSP in relation to whom the carrier or CSP has an obligation to provide access under section 10 (their resellers).

- **Section 28 – Welfare checks – significant network outages** – requires a CSP, as soon as practicable after becoming aware of a Significant Network Outage, or being notified of a Significant Network Outage, to undertake, or arrange to be undertaken, a welfare check on an end-user who made an unsuccessful emergency call during the outage.

Telecommunications (Customer Communications for Outages) Industry Standard 2024

The communications for outages standard commenced on 31 December 2024 for major outages and 30 June 2025 for significant local outages.

In a major outage or a significant local outage, a telco must communicate information about the outage to:

- Customers and the public
- Other carriers and carriage service providers
- Relevant stakeholders (the ACMA, Dept, NEMA, TIO, Emergency Call Persons for 000/112 and 106).

Telcos must also:

- put relevant and up-to-date information on their website
- keep customers up to date using methods including apps, email, SMS, other media, call centres and, for major outages, social media.

Industry Code C536: Emergency Call Service Requirements

- Section 4.6 of the Code requires a carrier or CSP, after becoming aware of a Significant Network Outage in its network, must provide the ACMA via email, on or before the next Business Day with a copy of the notifications which the carrier or CSP sent to the ECP for 000/112 and ECP for 106 under section 27(2)(a) of the ECS Determination.

Background**Should camp-on and network wilting have worked during this incident?**

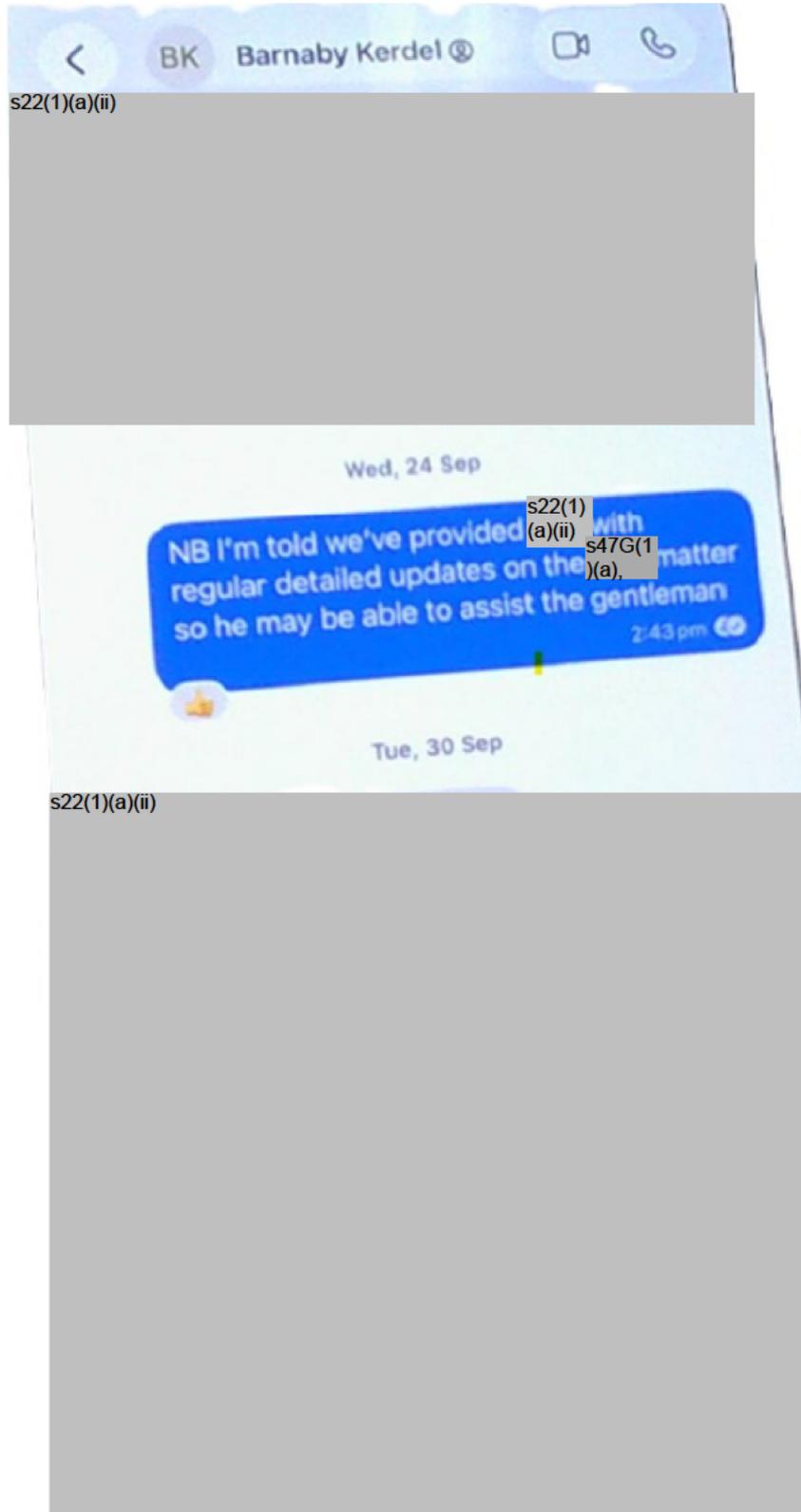
- A mobile phone will 'camp-on' to another mobile network when it is outside the mobile coverage provided by the home mobile network, including in some circumstances where its home mobile network is experiencing an outage.
- A mobile phone will attempt make a call using its own mobile network if the radio access network of that mobile network is available (if the mobile bases station/antenna are radiating a signal).
- New rules for wilting of mobile networks will commence on 1 November 2025 (when the [Telecommunications \(Emergency Call Service\) Amendment Determination 2025 No.1](#) commences).
- The new rules to commence on 1 November 2025 require a mobile carrier to 'wilt' the network if the core network is experiencing a 'core network outage'.
- We need to establish the facts of this issue to determine whether, had the new rules been in place (which they are not), whether this outage was a core network outage. On the information currently available, it may not, as all voice and data services other than Triple Zero appear to have been operating. In these circumstances, wilting the network would shutdown the network to all users in the relevant states/territories, so that could itself have

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a detrimental impact to customers and the public. It is also important to note that Optus were apparently unaware of the failure in connecting triple zero calls.

Welfare Checks

- Welfare checks are required to be undertaken under section 27 of the ECS Determination.
- A CSP must undertake a welfare check as soon as practicable after becoming aware of a Significant Network Outage, or being notified of a Significant Network Outage.
- A welfare check for mobile customers may be undertaken using an SMS that requests the customer confirms via return text if they require assistance.
- A welfare check for a fixed-line service requires a phone call to the number.





Barnaby Kerdel

Call History

s22(1)(a)(ii)



Incoming Call
3 minutes

25/9/2025 - 2:44 pm

Incoming Call
33 seconds

25/9/2025 - 12:31 pm

Incoming Call
4 minutes

24/9/2025 - 2:45 pm

Incoming Call
2 minutes

24/9/2025 - 1:54 pm

Incoming Call
1 minute

24/9/2025 - 10:37 am

s22(1)(a)(ii)



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From: Grunhard, Samuel
Sent: Thursday, 25 September 2025 1:36 PM
To: Kerdel, Barnaby (A. Wells, MP); Kerdel, Barnaby
Cc: s22(1)(a)(ii); CHISHOLM, James; s22(1)(a)(ii); Silleri, Kathleen; s22(1)(a)(ii); DLO Wells
Subject: s47C
Attachments: s47C [SEC-PROTECTED, CAVEAT-SH-CABINET, ACCESS-Legal-Privilege] s47C .docx

~~PROTECTED, SH-CABINET, Legal Privilege~~

Hi Barnaby,

s47C [Redacted]

Kind regards
Sam

Sam Grunhard

First Assistant Secretary
 Communications Services and Consumer Division
 Communications and Media Group
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~~PROTECTED, SH-CABINET, Legal Privilege~~

~~This material contains information that may be subject to legal professional privilege.~~

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From: Grunhard, Samuel
Sent: Friday, 26 September 2025 2:22 PM
To: Kerdel, Barnaby (A. Wells, MP); Kerdel, Barnaby
Cc: s22(1)(a)(ii) CHISHOLM, James; Silleri, Kathleen; Sparreboom, Shanyn
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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