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

TRIPLE ZERO CUSTODIAN

Triple Zero Legislative and Regulatory Review

Interim Report

October 2026



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1. Executive summary

The Triple Zero Legislative and Regulatory Review (the Review) is assessing whether the current legislative and regulatory framework remains fit for purpose in supporting an effective and responsive emergency call service, particularly in light of recent incidents, technological change and evolving expectations. It is examining whether the roles, obligations, powers, information flows and assurance arrangements that support Triple Zero remain clear, effective and adaptable now and into the future. The Review's Terms of Reference can be found at **Attachment A**.

This interim report outlines the current legislative framework, summarises stakeholder views, and examines recent incidents, reviews and upcoming changes affecting Triple Zero.

It also sets out a scalable range of reform pathways, from changes within existing legislative settings to targeted amendments to primary legislation supported by changes to subordinate legislation. These pathways are not mutually exclusive and could be pursued individually, together or in sequence, depending on the issues identified.

Eight emerging themes will guide the Review's next phase:

- **Public safety first:** Frame Triple Zero as an end-to-end public safety service, with clear expectations for reliability, resilience and access.
- **Broader scope:** Ensure the framework covers the participants, systems and interfaces that materially affect access to Triple Zero services, not only those entities currently captured or only services for voice-call carriage.
- **Tools for the future:** Establish adaptable, technology-neutral settings that preserve core access principles while accommodating new technologies and delivery models.
- **Future access methods:** Create a clear pathway to assess and introduce new access methods without compromising voice access, reliability or operational readiness.
- **Regulatory capacity and scope:** Strengthen proactive, risk-based oversight so systemic issues can be identified and addressed before they affect the public.
- **Information gathering and sharing:** Improve timely, trusted and actionable information flows to support incident response, oversight and whole-of-system assurance.
- **Role clarity for ACMA and the Custodian:** Clarify the respective roles of ACMA and the Custodian, including how regulatory oversight, compliance and enforcement interact with system stewardship, visibility, assurance and improvement.
- **Reporting, accountability and liability:** Clarify responsibilities across the emergency communications chain and align accountability with each participant's role and control.

The Review will now gather further evidence, test emerging reform options and undertake targeted engagement before preparing recommendations for the final report. The final report is due to be provided to the Minister for Communications by 18 March 2027.

Note: minor updates have been made to the version of the report provided to the Minister to reflect recent developments in the telecommunications legislative environment which took place in October 2026.

2. Background

2.1 Context of the Review

Triple Zero is Australia's national emergency call service (ECS), enabling the public to seek emergency assistance from police, fire and ambulance services. The service has operated in various forms for more than 60 years and is now a critical part of Australia's public safety arrangements. From its inception, access to the ECS has predominantly been delivered by public or private entities that provide telecommunications services.

Triple Zero operates through a call-centre switching model that was developed for a predominantly fixed-line voice environment. Calls are received through a central answering point and transferred to the relevant police, fire or ambulance service. While this model remains in place, the technologies and service arrangements supporting it have changed substantially since Triple Zero expanded nationally in the 1980s and the current legislative framework was established in the 1990s.

In the 1990s, Australia liberalised its telecommunications market by introducing competition and moving away from a single dominant service provider. The introduction of the *Telecommunications Act 1997* (Tel Act) and the *Telecommunications (Consumer Protection and Service Standards) Act 1999* (TCPSS Act) established the core legislative framework that underpins much of telecommunications regulation today.

The framework reflects objectives relating to the long-term interests of end users, the efficiency and competitiveness of the telecommunications industry, and the availability and affordability of carriage services that enhance the welfare of Australians.

The framework also provides that telecommunications should be regulated in a manner that promotes the greatest practicable use of industry self-regulation and avoids undue financial and administrative burdens on industry participants, while not compromising the framework's objectives.

The TCPSS Act introduced a requirement for the regulator to make a written determination specifying requirements for the provision of an ECS. The first determination, the *Telecommunications (Emergency Call Service) Determination 1999*, set the core requirement for a determination specifying ECS requirements that remain in place today.

Mobile phones entered the Australian market from the late 1980s, with SMS capability introduced in the 1990s and mobile data capability introduced in the early 2000s. By the 2010s, mobile phones had become the predominant way many Australians accessed telecommunications services, with expanded mobile data capacity leading to a surge in popular mobile applications that made mobile devices integral to everyday life. Today, more than 85 per cent of Triple Zero calls are made from mobile phones, making mobile networks, device capability and emergency calling functionality central to the reliability of the Triple Zero service.

Since the 1990s, telecommunications has become a critical component of the Australian economy. Expectations about Triple Zero have also shifted, as the service was initially limited to certain geographic regions and was only accessible via fixed-line phones. Today, Australians may access Triple Zero through mobile, fixed-line, IP-based voice, payphone services and IoT services, among other things. This has expanded practical access to Triple Zero but has also increased reliance on network availability, device compatibility and technical arrangements that support emergency calling. It has also increased both the number of entities involved in supporting access to Triple Zero and the complexity of its delivery.

The Review is therefore considering whether a framework developed for a fixed-line, voice-centric telecommunications environment remains suitable for a mobile-first emergency communications system with distributed responsibilities and changing public expectations.

2.2 The Australian delivery model

Triple Zero is provided nationally, with the Emergency Call Person (ECP) acting as the initial national answering point for calls to Triple Zero. When an end user calls Triple Zero, they are asked whether they require police, fire or ambulance assistance, and their location where possible. The caller is then transferred to the relevant state or territory Emergency Service Organisation (ESO) answering point.

The Australian Constitution empowers the Australian Parliament to make laws with respect to telecommunications. Responsibility for police, fire and ambulance services, including the handling of calls transferred by the ECP, rests with state and territory governments.

Operational and governance arrangements vary across jurisdictions. Most jurisdictions maintain separate answering points for police, fire and ambulance, while Victoria has established Triple Zero Victoria as a dedicated agency responsible for call-taking and dispatch across all three services. Nationally, Telstra, as the ECP, transfers calls to 24 state and territory ESO answering points.

The public therefore experiences Triple Zero as a single national service, although responsibility for its end-to-end delivery is distributed across telecommunications providers, the ECP, ESOs and different levels of government. This requires effective coordination between participants responsible for carrying, answering, transferring and responding to emergency calls.

Other countries, such as the United States and Canada, use decentralised models with multiple emergency service answering points distributed by geographic area. In some jurisdictions, calls may be routed directly to local or regional ESOs based on the caller's location, and emergency call numbers may differ by service or jurisdiction.

Diagram 1: Emergency Call Process in Australia



2.3 The Triple Zero legislative and regulatory framework

Triple Zero is supported by a combination of Commonwealth legislation, subordinate legislative instruments, industry codes and guidelines. These settings impose different obligations on participants according to their role in delivering the service. However, the Commonwealth telecommunications framework does not cover every part of the end-to-end pathway, particularly call-taking and dispatch functions performed by state and territory emergency services.

The *Telecommunications Act 1997* establishes the telecommunications regulatory framework, including key concepts, entities captured and enforcement powers. This includes establishing the basis for emergency calling and related definitions. The *Telecommunications (Consumer Protection and Service Standards) Act 1999* provides the legislative basis for the ECS as a public interest telecommunications service, setting out the provisions for the Telecommunications (Emergency Call Service) Determination 2019 (ECS Determination), funding arrangements, the ECP and the Custodian.

The ECS Determination sets out the obligations for carriers and CSPs to carry and transfer Triple Zero calls to support the delivery of an effective emergency call service to the public. The ECS Determination also sets out the requirements on the ECP to accept calls and transfer them to ESOs to a high standard. A number of instruments, industry codes and guidelines are also established under legislation to support the effective delivery of Triple Zero. The Triple Zero ECP function is also supported through Module E of the Telstra Universal Service Obligation Performance Agreement (TUSOPA) rather than legislation or regulation alone. A more comprehensive overview of relevant legislation and regulatory instruments is at **Attachment B**.

3. What we heard

3.1 Consultation and engagement

The Review undertook public consultation between 26 May and 30 June 2026 and received 81 submissions: 22 from organisations and 59 from members of the public.¹

Engagement to date also included meetings with a range of stakeholders whose views informed the areas of convergence and divergence below, including:

Stakeholders	
ACMA	Australian Communications Consumer Action Network
Australian Telecommunications Alliance (ATA)	Concentrix
Ericsson	National Emergency Communications Working Group Australia/New Zealand
NBN Co	Telecommunications Industry Ombudsman
Telstra	TPG Telecom
Optus	Samsung
Vocus	

¹ Public submissions can be found at <https://www.infrastructure.gov.au/have-your-say/triple-zero-legislative-and-regulatory-review>

Targeted consultation was also undertaken with relevant portfolio and departmental areas to consider intersecting work on telecommunications regulation, ACMA's powers and regulatory capacity, consumer protections and universal service arrangements.

The following sections draw on this material to summarise areas of convergence and tension identified through public submissions, stakeholder engagement and targeted consultation.

3.2 Stakeholder areas of convergence

Access and reliability: Submissions support reliable voice access as the national Triple Zero baseline, while recognising that additional access modes may improve accessibility, redundancy or both if effectively integrated. Submissions also express views on broader telecommunications access and reliability risks in regional, rural, remote and First Nations communities.

Transparency and operational visibility: Submissions support better information sharing, reporting and operational visibility, particularly during outages and service degradation, and to monitor the ongoing performance and resilience of the system. Submissions recognise that public reporting, regulatory reporting and operational information sharing may require different settings.

Accountability and assurance: Submissions recognise that Triple Zero involves carriers, CSPs, ECPs, ESOs, device manufacturers, equipment vendors and governments. They support stronger end-to-end assurance, with obligations allocated according to each participant's role, control, visibility and capability. Submissions also note that new devices, tools and services capable of connecting to Triple Zero may not fall neatly into these categories, and that further work is needed to identify how relevant suppliers or providers should understand and meet their obligations.

Modernisation and implementation: Submissions support a technology-neutral framework with clear requirements for new access modes and stronger device and network assurance that will remain fit for purpose now and into the future. They also emphasise engagement with ESOs and jurisdictions before changes are made, given implications for funding, workforce, technology, data governance and public messaging.

Coordination: Submissions support clear national coordination, including a strong Custodian role in coordination, information sharing and post-incident review, while preserving ACMA's role as regulator and enforcement body. Stakeholders also identified the need to delineate the roles of the Custodian and ACMA in the legislative and regulatory framework and through clear messaging to industry and the public.

3.3 Stakeholder areas of divergence

Expanding access: Submissions broadly support a technology-neutral framework that can accommodate new access modes, but differ on the pace and conditions for doing so. Consumer stakeholders emphasise accessibility and redundancy while industry generally emphasises staged implementation, end-to-end testing and obligations aligned to control. ESOs support expansion where it improves public safety, but emphasise the need for operational integration (i.e. readiness for ESO organisations to accept an expanded access mode), funding and readiness before new access methods are promoted or regulated. This includes ensuring regulatory settings recognise that different access modes may involve different reliability, functionality and operational requirements.

Transparency settings: Consumer stakeholders seek stronger public reporting and clearer accountability to support confidence in Triple Zero. Industry cautions that metrics must be clear, comparable and linked to each party's role, control and visibility, with safeguards against duplication and disclosure of sensitive information. Industry submissions also suggest that some information may be suitable for public reporting, while other information may be better shared through government-led arrangements with trusted stakeholders.

Accountability and control: Submissions support clearer end-to-end assurance across Triple Zero, but differ on how accountability should be allocated. Consumer stakeholders focus on public outcomes where access fails. Industry emphasises that obligations and liability should be limited to functions within each party's control or reasonable influence.

Device assurance: Many stakeholders support bringing customer equipment suppliers more clearly into the regulatory framework, including through stronger lifecycle assurance, testing and device capability information. Consumer-focused submissions highlighted the need for targeted device restrictions that avoid unnecessary costs, reduced choice, confusion or reduced trust. This includes potential interventions before mobile devices need to be blocked, such as interventions at the point of sale or clearer information to consumers. Industry stakeholders noted persistent issues with managing devices intended to be used in other markets outside of Australia, commonly known as 'grey market' devices.

Information sharing arrangements: ESOs seek timely, actionable information about outages, service degradation, affected locations, failed calls, welfare checks, device issues and operational impacts. Industry supports improved information sharing where it is purpose-driven, technically feasible, secure, non-duplicative and clearly structured, with clear boundaries between Custodian stewardship and ACMA enforcement.

Regulatory powers and system stewardship: Consumer and ESO stakeholders support stronger accountability through regulation and proactive assurance. Industry seeks evidence-based and procedurally fair powers with clear thresholds. Submissions support a stronger Custodian role in coordination, information sharing and post-incident review, but differ on whether this should remain focused on system stewardship or extend to direct information gathering powers, binding operational standards or live incident coordination authority. The Australian Government may wish to consider the appropriateness and efficiency in taking on a further role when it comes to operational coordination, especially during outages, given its lack of ownership or control of the systems which support the Triple Zero service.

National consistency: Submissions support a simple, nationally consistent public entry point. ESO and jurisdictional stakeholders emphasise that national reforms can create uneven implementation obligations across jurisdictions, and that differences in organisational capability must be taken into account when changes are made to the operational system.

4. Recent events and future developments

4.1 Recent events

Outages, emergency calling incidents, inquiries and reviews

The Review responds to the final outstanding recommendation from the Bean Review. It also sits within a broader pattern of recent outages, emergency calling failures and network transition issues affecting access to Triple Zero. The following list is not exhaustive, but provides context for the different types of issues influencing public perception of Triple Zero reliability:

- On 8 November 2023, Optus customers, including customers of Optus network resellers, were impacted by a national whole-of-network outage. The outage interrupted critical services for consumers and businesses. It also impacted essential government, public health and safety infrastructure, including calls to Triple Zero.
- On 1 March 2024, Telstra experienced a disruption that prevented ECP call-takers from transferring calls to ESOs through regular processes. A backup procedure was initiated; however, some calls could not be transferred using that process. Telstra instead provided caller details to the relevant ESO by phone or email, so the ESO could call back the end user directly.
- On 18 September 2025, an outage occurred in the Optus network that left hundreds of Optus customers, including customers of Optus network resellers, unable to connect to Triple Zero.
- On 24 September and 13 November 2025, two separate incidents involved reports that Vodafone/TPG customers were unable to reach Triple Zero using certain mobile devices following the closure of the Vodafone/TPG 3G network.
- On 18 June 2026, Vodafone/TPG experienced an intermittent national outage affecting mobile services to its retail and wholesale customers. Triple Zero calls were diverted to Telstra and Optus networks through emergency camp-on procedures.
- From 8 to 10 July 2026, Telstra experienced a major outage that affected mobile services intermittently on a national scale, including some calls to Triple Zero. A subsequent related issue affected voice calls made via fixed wireless voice services that relied on Telstra's mobile network for connectivity.

In addition to these outages and events, there have been numerous reviews that have examined the Triple Zero system, including:

- the Bean Review,
- the 2024 Senate Environment and Communications References Committee inquiry into the Optus Network Outage of 8 November 2023,
- the Senate Environment and Communications References Committee Inquiry into Triple Zero Service Disruptions, which reported on 21 September 2026.

Together, these incidents and reviews have sustained public, parliamentary and regulatory scrutiny of Triple Zero reliability, resilience and oversight. They also highlight recurring issues relevant to this Review, including network reliability, device capability, outage communications, emergency call handling, information sharing and accountability across the end-to-end pathway.

2024 closure of 3G networks in Australia

In 2024, Telstra, Optus and TPG Telecom closed their 3G networks as part of the transition to newer mobile technologies. The closures raised public safety concerns because some devices that appeared to be 4G-compatible still relied on 3G networks to make emergency calls. As the scale of the issue became clearer, government and industry worked to identify affected devices, notify customers and manage the transition.

To reduce the risk that affected mobile phones would be unable to call Triple Zero, the then Minister for Communications directed ACMA to amend the Telecommunications (Emergency Call Service) Determination

2019 (ECS Determination). The amendments required service providers to identify affected devices, notify users and cease providing service to devices unable to make emergency calls over available networks. Device blocking arrangements have since continued to address devices identified as presenting emergency calling risks, including some devices intended for overseas markets. However, submissions from members of the public raised concerns about how these arrangements operate, including their consistency across mobile network operators and the information available about why particular devices are blocked. These concerns highlight the need to consider whether device assurance and consumer information arrangements could identify and address emergency calling risks earlier, before service blocking becomes necessary.

The transition demonstrated that risks to Triple Zero may arise from interactions between network changes, device capability, technical standards and consumer information, rather than from a single decision or regulatory breach. It also highlighted the importance of identifying Triple Zero risks early, coordinating major network transitions and ensuring government has sufficient information and regulatory tools to manage public safety risks.

The experience also informed the development of the Emergency Calling – Network and Mobile Phone Testing Industry Code. Testing under the code commenced in November 2025, with results informing consideration of whether current settings provide sufficient assurance of emergency calling capability.

4.2 Future developments

Changes to universal service arrangements

On 15 October 2026, the Telecommunications Legislation Amendment (Universal Outdoor Mobile Obligation) Bill 2025 (UOMO Bill) was passed by Parliament. It amends the TCPSS Act to support baseline outdoor mobile coverage being reasonably available to people in Australia. It will provide a pathway for mobile coverage to be embedded within the existing universal service framework, which currently applies to fixed-line telephones and payphones. Ensuring access to Triple Zero is as widely available as possible is a key policy objective of the UOMO.

It is expected that MNOs will supplement existing terrestrial mobile coverage with Low Earth Orbit Satellite Direct to Device (LEOSat D2D) services to meet the reasonable mobile coverage objective, subject to relevant market developments. The Review will consider how such emerging technologies and access methods should be treated within the broader Triple Zero legislative framework.

Changes to the consumer safeguards framework

On 15 October 2026, the Telecommunications Amendment (Enhancing Consumer Safeguards) Bill 2025 (TECS Bill) was passed by Parliament, amending the Tel Act to make industry codes directly enforceable by ACMA, among other changes. This applies to industry codes relevant to emergency calling, including:

- C674:2025 (Network and Mobile Phone Testing) and
- C536:2020 (Emergency Call Service Requirements).

The final report will consider the changes made with the passage of the TECS Bill, including whether requirements across primary legislation, subordinate instruments, industry codes and standards are supported by appropriately balanced powers, responsibilities and enforcement pathways.

Emerging access and delivery modes

The technologies used in delivering telecommunications services to consumers have been changing rapidly and are likely to continue to evolve, potentially at an even faster rate. These developments are creating new access and delivery modes to the Triple Zero ecosystem. Access modes refer to those technologies that end users use to connect to emergency services, either through connection to the ECP or directly to ESOs. Delivery modes refer to those technologies that can carry emergency communications from one point to

another, with conventional delivery modes used to date including terrestrial mobile networks and fixed-line phones.

Access modes and emerging devices

Emerging access modes, devices and services capable of contacting emergency services, such as connected vehicles (eCall), wearables, medical alerts, satellite-enabled messaging and other emerging access methods, are already being sold to consumers. Although grouped as ‘access modes’ for this interim report, these devices, services and tools do not all operate in the same way or present the same opportunities and risks.

eCall uses in-vehicle sensors to detect a serious collision, such as airbag deployment, which can be subject to defined performance, testing and false-call mitigation requirements. When these sensors are triggered, the vehicle’s system notifies an emergency service or intermediary and transmits relevant incident information to support the response. Most eCall systems rely on mobile networks, although some may also use satellite communications.

Wearables include connected watches, rings and glasses that can, or may in future, connect users to emergency services. Some wearables use indicators such as fall detection or health monitoring, including heart-rate monitoring, to trigger emergency notifications. These sensors may not be as robust as those used in eCall systems. Wearables may connect through mobile or satellite networks, either through the user’s mobile device or through their own SIM.

Medical alert devices are similar to wearables but are primarily designed to connect users with health services or emergency contacts when activated. They typically include a wearable trigger and signal transmitter and connect over telecommunications networks. These devices can either involve 24-hour monitoring centres or may be unmonitored. Medical alert devices may connect through fixed-line or mobile networks.

Finally, **satellite emergency messaging** refers to built-in device functionality, such as Apple Emergency SOS and Google Pixel Emergency SOS, that allows an end user outside terrestrial mobile coverage to contact emergency services through a relay centre. This access method bypasses traditional carriers by contacting Triple Zero on the end user’s behalf. However, its availability may be affected by satellite capacity and congestion, and it relies on a relay service.

Expanding access to Triple Zero

The Custodian is undertaking a proof-of-concept activity to gather evidence and better understand how SMS-based access to emergency call services could be delivered safely and effectively. This work aims to provide evidence about whether direct SMS access could support message initiation, delivery, receipt, triage and handover in an emergency response environment, as well as identify key risks, dependencies, governance requirements and implementation options and considerations. Findings from the proof-of-concept would help inform future consideration of SMS-based access to Triple Zero, including advice on policy, regulatory, technical, jurisdictional and implementation considerations.

Emerging delivery technologies

In terms of delivery modes, LEOSat D2D technologies are expanding the geographic areas in which end users may be able to access emergency services. Over time, LEOSat D2D technologies are expected to support voice, messaging and data directly to end users’ devices. To date, LEOSat technology has been used to provide fixed broadband access. However, many global companies are pursuing LEOSat D2D services, with Starlink currently providing services to MNOs globally, including Telstra in Australia (presently Telstra offers SMS and use of some selected applications outside of terrestrial mobile coverage). Other companies, including Amazon Leo, Lynk Global, AST SpaceMobile and Iridium, have also indicated plans to provide similar services to various degrees at a global scale. While this expansion in connectivity presents a key opportunity, the ecosystem should work through any possible risks to the delivery of Triple Zero communications, including whether the technical characteristics of delivery can fully replicate those which underpin the current terrestrial telecommunications networks.

The Triple Zero service is currently voice-based, and there is no general ability to message Triple Zero (with the exception of the messaging-to-relay capabilities, delivered by the National Relay Service for people who are d/Deaf, hard of hearing and/or have a speech communications difficulty). Broader mobile access to Triple Zero through LEOSat D2D technologies would depend on those technologies supporting voice calling, or on an expansion of Triple Zero to support messaging or data-enabled communications.

The global telecommunications industry has begun developing sixth-generation mobile network technology (6G). While standards remain at an early stage, 6G is expected to build on current mobile networks through more adaptable and resilient connectivity, stronger integration of terrestrial and non-terrestrial networks, improved security and greater use of automation. For Triple Zero, these capabilities may improve service continuity during outages, disasters and periods of high demand. More dynamic network management could help prioritise emergency communications, redirect resources and reduce service degradation. Better integration with satellite and other non-terrestrial networks may also extend access in remote areas or where terrestrial infrastructure is unavailable. 6G may also support more accurate location information, richer data and greater interoperability across networks, devices and service providers. If these capabilities can be properly integrated with the ECP and ESO systems, they could help emergency services identify callers, understand incidents and coordinate responses more effectively.

However, these benefits will depend on the final standards, network and device implementations, and assurance that emergency connectivity remains reliable during the transition from existing networks, including backwards compatibility with older handsets. Whether emergency calling standards build on those used in fifth-generation mobile networks (5G) or materially replace them will have implications for the continued availability of Triple Zero. The deployment of 6G services may also require resources and infrastructure currently supporting 4G networks to be redirected. This will have further implications for device compatibility as well as more general accessibility considerations if 4G services are being used to provide connectivity in more sparsely populated areas of regional and remote Australia.

Implications for the current access model

Access modes function in different ways. While consumers may be told that they can use these devices and services to contact Triple Zero, this may not always be the case, or an access mode may connect directly to an ESO rather than through the ECP. The current emergency calling model, which is based on the carrier, CSP and ECP pathway, may not accommodate all access modes or ensure the minimum service guarantees consumers expect. These access modes are not always directly regulated under the existing framework and may affect traffic to the ECP and ESOs.

Technological change is also influencing the access and delivery modes that support Triple Zero. As access and delivery modes change, technical considerations may challenge the performance assumptions which underpin key ECS Determination requirements, particularly given uncertainties about the ability to provide camp-on functionalities, SIMless calling and transmission of location data.

As the operating environment changes, any legislative changes to accommodate new access and delivery modes will need to consider whether important safeguards can be preserved and how consumers should be informed about any limitations or trade-offs associated with alternative technologies. The Review is considering whether the current legislative and regulatory framework can accommodate these developments while preserving appropriate safeguards.

Upcoming network transitions

Future mobile network transitions are expected over time as new generations of mobile technology are deployed and spectrum is reallocated to support this deployment. Future transitions may raise similar device and emergency calling issues as those that occurred as a result of the shutdown of the 3G network, particularly where devices rely on an older network layer to make emergency calls. The Review will therefore consider whether legislative or regulatory changes could better support the safe and coordinated management of future network transitions. This includes the role ACMA should play as regulator in requiring or overseeing industry network transition plans, and how MNOs, device manufacturers and equipment suppliers should engage, coordinate and manage assessments of risks, especially those to emergency calling,

and implement appropriate mitigations to these risks. The Review will also consider whether the Australian Government has the appropriate tools to identify and manage emergency calling risks associated with future network transitions. This could include how information is shared among stakeholders with direct involvement in the system, powers to test technical assumptions or outcomes, or the ability to review risk management practices in relation to network transitions. It will also consider how consumers should be informed and protected in any transition process.

Provision of the ECP

The TUSOPA is due to end in 2032. The expiry of the current contract provides an opportunity for the Australian Government to consider whether the arrangement remains fit for purpose. This could include the Commonwealth's role in the future delivery and reform of the Triple Zero service, having regard to emerging risks and technological change. An assessment of possible future ECP models and the capabilities needed to support a modernised emergency call service is necessary, including the legislative basis required to support the deployment of alternative models of Triple Zero delivery.

This could include models that materially change the current single-ECP structure, including models with multiple ECPs or no separate ECP function. The ECP function is reflected in both legislation and the contractual arrangements between the Australian Government and Telstra. The Review will need to consider what legislative or regulatory settings would provide sufficient flexibility for future ECP arrangements.

While the Review will not consider TUSOPA reform in detail, it will consider how legislative and regulatory settings could support future contractual arrangements and the modernised delivery of the emergency call service.

5. Emerging themes

This section discusses emerging themes, including options to be explored in the final report. These options are presented to indicate the direction of further stakeholder discussions and information gathering in the next stage of the Review, and are *not* presented as recommendations. Any recommendations made in the final report will be informed by additional policy, legal and implementation analysis. Decisions on whether to progress any recommendations made in the final report will also be subject to Government agreement, and if progressing amendments to primary legislation, could include Parliamentary consideration.

The Review has identified eight emerging themes from its consideration of the current framework, stakeholder views, recent events and future developments. The themes are related but distinct and cover: the purpose and scope of the framework, the tools and powers needed to administer it, and how responsibilities, information and future access pathways should be managed across the end-to-end Triple Zero system.



5.1 Public safety first

What the Review has examined

The Review has considered whether the current framework supports Triple Zero as a public safety service. This includes whether it helps connect a person in need with the appropriate emergency service, and whether the framework remains focused on reliability, accessibility and safety as networks, devices, technologies and public expectations change.

Emerging issue

- The purpose of Triple Zero is broader than carrying an emergency call. The framework should support the full pathway from a person seeking help to the relevant emergency service receiving the communication and being able to act on it. That pathway depends on networks, devices, software, the ECP, ESOs and supporting technical arrangements working together.
- Current arrangements may not fully reflect that end-to-end public safety purpose. Existing obligations address important parts of the system but may not always make clear what level of reliability or resilience is expected across the broader emergency communications pathway. This can make it harder to assess whether the system as a whole is supporting reliable access to emergency assistance.

Stakeholder views

Submissions to the Review generally support treating Triple Zero as a public safety service, with reliability, resilience, accessibility and equitable access reflected more clearly in the framework.

Submissions:

- Stated that telecommunications services, including the ECS, should be viewed as an essential community service providing access to critical public safety services.
- Support reliability and redundancy becoming primary objectives of the Triple Zero service.
- Suggest Triple Zero is a critical national safety service and the framework should recognise Triple Zero as an end-to-end national safety system, not simply a regulated call carriage obligation.

No submission explicitly contested this framing, although industry submissions emphasise that any reforms should be proportionate, outcome-focused and capable of being implemented consistently with reliability, accountability and technical or operational constraints.

Why it matters

- Public confidence in Triple Zero depends on the service working so that people can access emergency help when needed. If the framework is not clearly directed to that outcome, there is a risk that issues with specific aspects of the system may be assessed too narrowly and by reference to individual

obligations, rather than to confirm whether the emergency communications system is appropriately enabling people to reach the right assistance when they need it.

- The final report will test whether clearer public safety objectives and role-based responsibilities are needed to support and assess reliability from a system-wide perspective. Such a framework could consider whether settings provide the safeguards needed to support reliable access to emergency assistance as technologies, delivery models and public expectations change, rather than tying delivery to general telecommunications service quality or mobile coverage.

Options to be explored in the final report include

- Appropriate mechanisms to recognise emergency communications as a public safety service.
- Reliability, resilience, accessibility and safety outcomes for the emergency communications pathway, supported by role-based obligations.



5.2 Broader scope

What the Review has examined

The Review has considered whether the current Triple Zero framework is broad enough to support reliable access to emergency services as technologies, delivery models and public expectations for how to contact Triple Zero change. This includes whether the framework should remain centred on emergency voice calls, whether it adequately reflects the wider system involved in delivering Triple Zero, and how future operational arrangements can support a modern emergency communications model.

Emerging issue

- The current framework is largely built around voice calling and the obligations needed to carry and handle emergency voice calls. That should remain the core national baseline, though this may not adequately reflect a system that now depends on multiple technical, operational and institutional interfaces. Triple Zero relies on carriers, CSPs, the ECP, devices, software, emergency service systems, regulators and governments working together. Some risks may arise at the interfaces between actors and systems, and may not sit within the direct control of a single entity. These risks may occur outside the carriage of an emergency call, including at the interfaces between device manufacturers and MNOs, MNOs and the ECP, or the ECP and ESOs.
- Broadening scope would not necessarily mean directly regulating every participant in the ecosystem. Rather, it could mean ensuring the framework captures the right actors, capabilities and delivery arrangements to support reliable emergency access across the parts of the system that affect public safety outcomes. It also includes whether the framework should move from an emergency call service concept towards a broader emergency communications model, expanding the possible pathways for connection where this would better support reliable access to emergency assistance.

Stakeholder views

Submissions received generally support modernising the framework so it better reflects the broader emergency communications ecosystem, rather than only emergency voice call carriage.

Submissions:

- Suggest the current framework is too voice-centric and carrier/CSP-focused, and that Triple Zero should be recognised as an end-to-end national safety system rather than simply a regulated call carriage obligation.
- Clarify that emergency communications operate across a multi-party ecosystem, including devices, the ECP and ESOs, with a modernised framework needing to be clear, proportionate and aligned to operational control.



5.2 Broader scope

- State that carriers, ECPs, CSPs and other entities that enable emergency communications should maintain continuous, resilient and measurable Triple Zero capability.
- Industry submissions support clearer end-to-end accountability, but emphasise that obligations should be carefully designed, proportionate and aligned to the functions each party can reasonably control.

Why it matters

- A framework that is too narrow may not reflect how Triple Zero is delivered now or how emergency communications may change over time. If responsibilities and delivery arrangements are assessed only through the lens of emergency voice call carriage, the framework may not adequately account for the wider dependencies that affect whether people can reliably access emergency assistance.

Options to be explored in the final report include

- A broader emergency communications framework, rather than just an emergency call service framework, where this would better support reliable access to emergency assistance.
- A clearer framework to capture entities providing technical capabilities which affect Triple Zero delivery.
- Role-based obligations, standards or guidance for in-scope participants, aligned to what they control, operate or materially influence.
- Review of device manufacturer regulations, ensuring these are relevant in a mobile-first telecommunications environment.
- Flexibility to accommodate future ECS contract settings.



5.3 Tools for the future

What the Review has examined

The Review has considered how the Triple Zero framework should adapt as technologies, delivery models and public expectations change. This includes whether the current framework provides the Australian Government with the right tools to manage opportunities and risks to the provision of access to the service in accordance with technological and demand changes.

Emerging issue

- Networks, devices, software and access technologies are changing, and some future pathways may not fit neatly within current regulatory concepts. ESO call-taking, dispatch and information-handling capability may also change over time. The framework may therefore need to account for both ESO readiness to receive communications and the potential for richer information flows as ESO capabilities evolve.
- Future reforms may need to modernise the principles that guide access to Triple Zero. The framework should continue to protect reasonable, equitable and reliable access to emergency assistance, but may need to express those principles in a way that is less tied to a particular technology. This could allow the framework to distinguish between enduring access principles and more detailed technical, operational or service-specific requirements that may need to evolve over time.
- The final report will assess whether a structured process is needed for considering emerging technologies and future delivery models. Future changes to emergency communications settings should be assessed through clear requirements, including reliability, operational readiness, system integrity



5.3 Tools for the future

and public safety risk. The issue is therefore the adaptability of the framework itself, including the legislative, regulatory and assurance mechanisms needed to assess and manage future technologies over time.

- The Australian Government will also need to consider whether it is able to appropriately manage the risks and opportunities associated with new technologies, demand changes and transitions in consumer services. Where the government identifies a risk to end-user safety relating to Triple Zero, it may need a range of measures to manage that risk or communicate it effectively to stakeholders and end users.

Stakeholder views

Submissions to the Review generally support modernising the framework so it can adapt as technologies, networks, devices and delivery models change.

Submissions:

- Call for the introduction of a technology-neutral, modular framework that can introduce, refine, scale, retire or transition emergency communication pathways over time, including during major technology lifecycle changes.
- Support technology neutrality and modularity, but caution that technology neutrality should not be treated as automatic technical equivalence between access modes.
- Suggest the framework is not fit for purpose in a multi-modal environment and that new communication methods would require more than incremental amendments to existing rules.
- Support modernisation where changes preserve reliability, accessibility and safety.

No submission expressly opposed future-proofing or technology-neutral reform in principle, although industry submissions emphasise reliability, technical differentiation and practical implementation.

Why it matters

- A framework that cannot adapt may become harder to administer and may require repeated ad hoc reform as technologies and delivery models change. At the same time, a framework that adapts without clear thresholds could create new risks or place pressure on ESOs and other participants before capability and readiness have been established.
- Similarly, just because consumers, device manufacturers or service providers would like to deploy a particular communications mechanism does not mean it can effectively and safely deliver emergency services to a person in need.
- A more adaptable framework could help preserve the simplicity and reliability of the national Triple Zero service while allowing the system to evolve. This may include updated access principles, technology-neutral or modular requirements, and structured processes for assessing future changes against clear public safety, reliability and operational criteria.

Options to be explored in the final report include

- Minimum emergency communications standards for proposed delivery models, services and technologies before they are introduced into the Triple Zero environment.
- Transition management requirements for major network, technology or service changes that may affect emergency communications capability.



5.4 Future access methods

What the Review has examined

The Review has considered whether the Triple Zero framework is sufficiently broad and adaptable to remain fit for purpose as emergency communications evolve. This includes the forms of emergency access the framework should cover and how it can accommodate new technologies and public expectations while preserving reliability, accessibility and safety. A central consideration has been how best to inform consumers about the relative capabilities of different methods of accessing Triple Zero.

Emerging issue

- The current framework reflects the established model of emergency access, built largely around voice calls to Triple Zero. This is consistent with how people have traditionally contacted emergency services and how technical standards have embedded emergency calling capability in networks and devices.
- That model may not be sufficient as messaging, data-enabled access and other future contact methods develop. These methods should be assessed as potential ways to improve emergency access, rather than as policy objectives in themselves. The central issue is whether the framework should move towards regulating Triple Zero as an emergency communications service, rather than solely as an emergency call service, with clear pathways for assessing and incorporating appropriate new access methods over time.
- This raises practical questions about how new or supplementary methods of contacting Triple Zero should be assessed, authorised, communicated to consumers and integrated with ECP and ESO capability. The current framework may not provide a clear and comprehensive mechanism for deciding which new access methods should be permitted, restricted or subject to conditions.
- It would also have implications for the 'single national system' objective, which has been a central tenet of the policy behind the delivery of the ECS to date. If jurisdictions have different operational capabilities as new access methods are legislated, there may be tension with maintaining the single system moving forward.
- The final report will assess whether the legislative and regulatory framework appropriately recognises that decisions about operational outcomes and conditions for providing access to Triple Zero require governance arrangements involving stakeholders across the emergency communications ecosystem.
- Without appropriate safeguards, devices, tools and services may be developed that access Triple Zero, or connect directly to ESOs, without assurance that they will operate effectively across the system. This could place additional pressure on the ECP and ESOs and create risks to service reliability that may not be clear to end users.

Stakeholder views

Submissions to the Review generally support modernising the framework to accommodate future access methods, but emphasise that new channels should preserve reliability, public safety and operational readiness.

Submissions:

- Support broader communication options, distinguishing between primary modes, such as carrier-grade voice, and secondary modes, such as messaging.
- State that new access channels should be supplementary to voice, not a replacement, and introduced only where they meet defined reliability and resilience thresholds.
- Support multi-modal access while stating that mission-critical communications must meet strict reliability thresholds and cannot compromise accessibility or safety. Multi-modal access may also enhance emergency access, particularly for regional, rural and remote Australia, but must complement reliable and resilient emergency communications.



5.4 Future access methods

- Submissions also support clearer governance over eligible devices and technologies, with views including certification-style mechanisms, ACMA identification of device or technology classes, evidence-based technical requirements and clear consumer information about capabilities and limitations.

Why it matters

- New access methods may improve accessibility and extend public reach, but they must be assessed against reliability, operational readiness and public safety risks. As emergency communications evolve, the framework will need to continue capturing the technologies and participants necessary to support reliable access to Triple Zero. Carriers, CSPs and the ECP (depending on future ECP models) will remain central, but future access methods may also depend on device manufacturers, software and platform providers, ESOs and other parties whose systems affect whether an emergency communication can be initiated, carried, received or acted upon.
- This does not assume that all such participants should be directly regulated. However, it highlights the need to determine where obligations, approval pathways or assurance mechanisms may be required. Consumers should also receive clear information about different methods of accessing emergency assistance, including those outside the traditional carrier, CSP and ECP model.
- Similarly, consumer demand for new technologies and services may push government, the regulator or service providers to use those nascent services which do not fit neatly into the current obligations, and the legislative framework should provide the ability to introduce new communications methods should they appropriately meet service outcome standards.
- The key challenge is to balance the benefits of new access methods and innovation with the need to preserve the reliability, resilience and usability of Triple Zero.

Options to be explored in the final report include

- Establishing an emergency communications service, rather than an emergency call service, supported by subordinate instruments for different access methods. This could provide a technology-neutral outcome, supported by technology-specific provisions.
- Minimum technical, operational and assurance standards for access methods outside the traditional carrier, CSP and ECP model.
- A mandatory coordination mechanism for network providers, device suppliers and equipment vendors involved in emergency calling.
- Minimum information requirements for end users about different methods of accessing Triple Zero, both inside and outside of the carrier, CSP and ECP model.



5.5 Regulatory capacity and scope

What the Review has examined

The Review has considered whether the regulatory framework supports early identification and management of risks to Triple Zero. This includes whether government entities have clear responsibility and appropriate tools to identify, assess and respond to systemic risks, whether existing powers support timely intervention, and whether the framework gives sufficient weight to Triple Zero as a core public safety service.



5.5 Regulatory capacity and scope

Emerging issue

- ACMA is responsible for regulating telecommunications, including monitoring compliance with Triple Zero obligations, investigating potential non-compliance and taking enforcement action where required. As Triple Zero delivery becomes more complex and independent, the need for a government entity to proactively identify risks before they affect the public may be increasingly important.
- Risks to the delivery of Triple Zero may not always present as a single breach by a single entity, and may become apparent through recurring patterns, technical dependencies, device or network interactions, incomplete information, or issues involving several participants. For example, the risks to Triple Zero access as the MNOs shut down the national 3G networks in 2024 arose from different decisions made by multiple actors, without a clear regulatory breach.
- However, the cumulative effect of these decisions exposed an apparent gap in the framework's capacity to manage systemic risks associated with the 3G closure. At the time, regulatory tools with the most weight, carrier licence conditions, were available to the Minister rather than ACMA. However, information gathering powers were only available to ACMA and not the Minister.
- This misalignment in information gathering and regulatory power may indicate gaps in the way risk is allocated and managed within the framework.
- End users also lacked clear information to help them understand the issue and make informed purchasing decisions.
- An approach focused mainly on after-the-fact investigation of non-compliance may not be sufficient where risks to emergency access need to be identified and addressed before they affect the public. The Review is considering whether the framework supports a more proactive regulatory approach, including earlier scrutiny of risks, stronger assurance that remediation has occurred, and clearer expectations about how public safety risks should be managed.
- The Review is also considering whether additional powers are needed, or whether some issues could be addressed through clearer regulatory expectations, stronger use of existing powers, better evidence, improved assurance practices or clearer enforcement thresholds. Any change would need to be targeted and proportionate, with appropriate safeguards and procedural fairness.
- Regulatory capacity can also be influenced by resourcing considerations. Funding of an additional \$23.4 million over four years in the 2025-26 Mid-Year Economic and Fiscal Outlook (MYEFO) has supported the establishment of a dedicated Triple Zero Branch in ACMA. The Triple Zero Branch provides additional capacity to undertake regulatory and compliance activities around Triple Zero matters. ACMA has indicated that this additional capacity will support further audits, compliance assessments, investigations and potential enforcement action.

Stakeholder views

Submissions to the Review generally support a more proactive approach to identifying and addressing Triple Zero risks, but differ on whether this requires broad new powers, targeted powers or clearer use of existing settings.

Submissions:

- Support enabling a risk-based approach, including risk assessments, independent testing and audits, improvement plans and performance and outage data.
- Identify opportunities for forward-looking technical standards, compulsory audits and interim conditions on new network technologies.
- Submit that any new powers must be targeted and anchored in evidence, process and accountability.
- Caution that any expansion of powers should be based on a clearly identified need that cannot be addressed by existing powers, and that poorly designed powers could create regulatory uncertainty, duplication and additional burden.



5.5 Regulatory capacity and scope

Why it matters

- Effective oversight of Triple Zero needs to support prevention as well as response. If systemic risks are not visible early, or if the pathway for regulatory action is unclear, issues may persist until an incident occurs and end users are affected. At the same time, poorly targeted or overly broad powers could increase burden, duplicate existing processes or create uncertainty without improving public safety outcomes.
- Without clear responsibility and effective mechanisms for identifying, testing and responding to systemic risks, issues affecting emergency access may not be identified or addressed before they result in harm. This is particularly important where risks extend across several participants or do not involve a discrete breach by a single entity.
- ACMA needs to be provided with an effective suite of tools with which to ensure the behaviour of all the participants in the system can deliver an effective and reliable Triple Zero service.

Options to be explored in the final report include

- Powers and settings that support earlier identification and management of Triple Zero risks.
- Targeted powers for ACMA to obtain evidence, test claims or require substantiation where risks to Triple Zero reliability, resilience or operational integrity are identified.
- Assurance requirements, including audits, attestations or evidence of remediation, where incidents or systemic risks affect access to emergency communications.
- Proportionate regulatory settings for systemic or recurring Triple Zero risks, including risks that may not present as a discrete breach by a single entity.
- Clear thresholds for when existing powers, additional powers or stronger assurance requirements should apply to public safety risks.



5.6 Information gathering and sharing

What the Review has examined

The Review has considered whether the regulatory framework supports early identification and management of risks to Triple Zero. This includes whether government entities have clear responsibility and appropriate tools to identify, assess and respond to systemic risks, whether existing powers support timely intervention, and whether the framework gives sufficient weight to Triple Zero as a core public safety service.

Emerging issue

- Recent regulatory changes have improved the availability of information about telecommunications outages and their potential effect on Triple Zero calls. However, information may not always be timely, accessible or sufficiently detailed to support operational decisions for ESOs. Key questions include what information should be shared with ESOs, regulators, government and other relevant stakeholders during an incident.
- Notwithstanding requirements on carriers to report network and Triple Zero disruptions, the Australian Government may not have a complete view of Triple Zero's end-to-end performance, particularly before a call reaches the ECP. This can make it difficult to communicate a shared understanding of system performance to stakeholders, including the public.



5.6 Information gathering and sharing

- Responsibility for delivering Triple Zero is also distributed across entities that may compete in other areas. This can inhibit trusted information sharing and limit visibility of emerging risks, making it more difficult for government to play its stewardship role to support the ongoing protection of Triple Zero availability.
- The Review is considering whether clearer information-sharing obligations, protected disclosure arrangements and stronger performance reporting are needed. It is also considering whether the Custodian's system stewardship, visibility, assurance and improvement role should be strengthened. This includes whether the Custodian should serve as a central point for identifying and assessing longer-term systemic risks. Any change would need appropriate privacy, confidentiality and security safeguards, and should avoid unnecessary duplication. The central issue is whether the framework provides the visibility needed to support operational response, system stewardship and assurance.
- This role is distinct from that of ACMA, which uses information to monitor compliance with telecommunications rules and laws, investigates where it suspects a breach and takes regulatory action where appropriate.

Stakeholder views

Submissions to the Review generally support stronger information sharing and operational visibility across the Triple Zero ecosystem, particularly during outages or service degradation, but differ on the appropriate model, level of detail and safeguards.

Submissions:

- Propose a Custodian-led information hub to receive, aggregate, validate and disseminate relevant operational information across the ecosystem.
- State that information-sharing should support state emergency management arrangements, including direct information flows to affected ESOs and clear roles for the Custodian, ACMA, industry and ESOs.
- Emphasise the need to distinguish information shared for ACMA regulatory oversight from information shared for Custodian stewardship, with arrangements similar to a safe harbour for specified disclosures.
- Support a trusted hub for operational coordination during unplanned outages and limited-use information-sharing obligations.

Industry submissions caution that new requirements should avoid duplication, be operationally useful and not create unnecessary burdens during live incidents. Some support a coordination role for the Custodian, particularly during outages. However, the Custodian does not own or operate the networks that carry or deliver Triple Zero calls and would not be responsible for core technical and restoration decisions.

Why it matters

- Effective incident response and system oversight depend on timely, accurate and actionable information. If relevant organisations cannot identify affected services, locations, calls or devices, operational responses may be delayed and systemic risks may remain unresolved.
- At the same time, poorly designed information requirements could duplicate existing reporting, expose sensitive information or create additional burden without improving public safety outcomes. Further work will test whether clearer requirements are needed for incident information sharing, performance reporting and protected disclosure.



5.6 Information gathering and sharing

Options to be explored in the final report include

- A real-time information gathering and sharing mechanism for live incidents affecting emergency communications.
- Defined operational and performance reporting measures for relevant entities. This could include the introduction of record-keeping rules, with the ability for government to periodically retrieve data.
- Trusted information-sharing arrangements for operational, regulatory and system-assurance information between industry, ESOs, regulators, government and the Custodian.
- Protected disclosure and safe harbour provisions for information shared for system stewardship, accountability and risk management.
- Clear separation between information provided for regulatory compliance and information shared for broader system assurance.



5.7 Role clarity for ACMA and the Custodian

What the Review has examined

The Review has considered the respective roles of the Custodian and ACMA, the arrangements for referring matters for regulatory action, and whether current oversight and compliance powers enable system-wide and compliance risks to be identified and addressed promptly.

Emerging issue

- Stakeholders have suggested that the respective roles of the Custodian and ACMA, including when matters should be referred for action, may require clarification. Current arrangements may not support early identification of system-wide or compliance risks or provide ACMA with an appropriate range of responses to non-compliance.
- There is a need to more clearly delineate ACMA as the entity responsible for regulatory oversight, compliance and enforcement and the Custodian as the entity responsible for system visibility, stewardship, assurance and improvement.

Stakeholder views

Submissions to the Review generally support clearer delineation between ACMA's regulatory and enforcement role and the Custodian's stewardship, visibility and system improvement role.

Submissions:

- State that the conceptual distinction between ACMA as regulator and the Custodian as system steward is appropriate but needs to be operationalised more clearly.
- Caution that Custodian information gathering should be clearly distinguished from formal investigation-like functions, and that duplication between ACMA and Custodian activity should be avoided.
- Recommend delineating the Custodian's role from ACMA as regulator, with the Custodian coordinating a trusted hub for information exchange and operational oversight of information provision during unplanned outages.
- Call for further clarity on how information is shared between ACMA and the Custodian, which entity is the primary contact point during an active incident, and how the entities coordinate before issuing directions or information requests.



5.7 Role clarity for ACMA and the Custodian

- Support clarification where system-wide issues require both coordination and intervention, with Custodian powers operating alongside, not instead of, ACMA's enforcement powers.

Why it matters

- Clear role delineation is important because the Custodian and ACMA perform different functions within the Triple Zero framework. ACMA is responsible for compliance and enforcement, while the Custodian's role is directed to system visibility, stewardship, assurance and improvement.
- If these roles are not clearly understood, participants may be uncertain about the purpose of information requests, when matters may be referred for regulatory action, and how information shared for system stewardship may be used.
- Clearer role definition would support trusted engagement with industry, ESOs and other participants while preserving ACMA's enforcement role. It would also help ensure that system-wide risks can be identified and escalated without creating unnecessary duplication, quasi-investigation activity or uncertainty about the respective functions of the Custodian and ACMA.

Options to be explored in the final report include

- Clearly delineating the roles and functions of the Custodian and ACMA, including how the Custodian's formal powers should operate, whether some powers should be exercised through or independently of ACMA, and how those arrangements would interact with ACMA's compliance and enforcement role.
- Information-sharing arrangements that distinguish information provided for the Custodian's stewardship and assurance functions from information provided for ACMA's compliance and enforcement functions.
- Protected disclosure and safe harbour provisions for information shared for system stewardship, accountability and risk management during outages to ensure regulatory compliance is not a barrier to clear communication during incidents.
- Consideration of how best to communicate the different roles of government entities involved in Triple Zero oversight, noting this may sit outside the Review's legislative and regulatory remit.
- Considering any new or amended powers for ACMA to regulate the entities that deliver access to Triple Zero.



5.8 Reporting, accountability and liability

What the Review has examined

The Review has examined how responsibilities are allocated across the emergency communications system and whether accountability is clear. Responsibility is distributed across several participants, and accountability may not always be well defined. The Review has also considered how risks are reported and managed. Given the number of stakeholders that directly affect the delivery of Triple Zero, protecting the public interest may depend on those stakeholders coordinating their decisions effectively.

Emerging issue

- Triple Zero exists to enable people to seek emergency assistance, but responsibility for delivering this outcome is shared across many participants. The system depends on networks, devices, software, call-handling arrangements and emergency service systems. Risks to access may arise at the points where these parts of the system interact, rather than solely within the direct control of a single provider.

Significant network, technology or service decisions may affect Triple Zero calling and require clear reporting, assurance and accountability arrangements. Without effective coordination, decisions affecting Triple Zero may be made within entity-specific operational or commercial contexts, with consequences for the service provided to end users.

- This theme is distinct from information sharing: it is concerned with how responsibility is allocated and demonstrated across the end-to-end pathway, rather than only with the movement of information between participants.
- Introducing more participants to the regulatory system also increases its complexity (including where some participants may not be domiciled in Australia).

Stakeholder views

Submissions to the Review generally support stronger visibility of Triple Zero performance and clearer accountability across the end-to-end emergency communications chain, but differ on the scope, granularity and public treatment of reporting.

Submissions:

- State that transparency and accountability should be core principles of the service and support enhanced performance reporting on matters including call completion, failed emergency call attempts, outages, network changes, systemic issues and corrective actions.
- Call for accountability across the full call chain, supported by measurable and auditable performance standards.

Industry submissions also emphasise that accountability and liability should align with each participant's role and reasonable control.

Why it matters

- Individual entities may make decisions about their networks and services based on their own operational, commercial or technical considerations. These decisions can affect Triple Zero where they are made without sufficient regard to related decisions by other participants or the cumulative effect on the emergency communications system.
- Decisions that directly or indirectly affect the carriage of Triple Zero calls should be considered with regard to their cumulative effects on public safety. Where deficiencies or risks are identified, relevant participants may need clear expectations about how those risks are reported, managed and addressed.

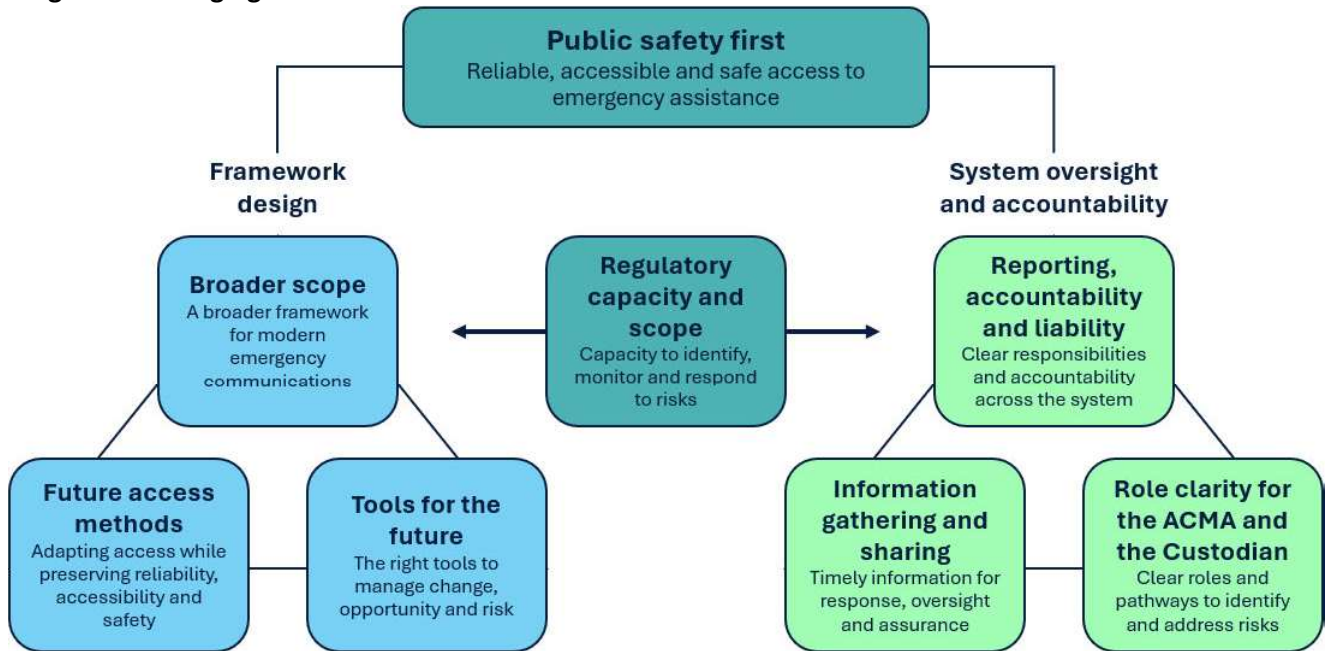
Options to be explored in the final report include

- A regular, system-wide risk management audit process to identify current and emerging risks across the end-to-end Triple Zero pathway.
- Network delivery standards to promote consistency and reliability in the delivery of Triple Zero calls.
- An expanded independent emergency call testing and research program to identify and assess emergency calling risks.
- Clearer expectations for acceptable access to and delivery of Triple Zero, including where services or devices cannot support Triple Zero calls, especially where this limitation may not be readily apparent to end users.

Themes and options for reform

These themes tie together to provide an overall framework for considering options as a collective and this is represented in Diagram 2 below.

Diagram 2: Emerging Themes



6. Scalable pathways for reform

The Review will assess each emerging theme against a scalable range of reform pathways. These pathways describe the possible scale and legislative mechanism of reform rather than discrete or mutually exclusive options. Different themes may require different levels of intervention, and reforms could be pursued individually, concurrently or in sequence.

At one end of the scale, some issues may be addressed through subordinate legislation within existing statutory settings. Broader or deeper reform may require targeted amendments to primary legislation, supported by consequential or additional changes to subordinate legislation.

The Review will use these pathways to assess the nature and scale of reform required for each emerging theme. This includes considering whether practical improvements could be made within current settings if or while more substantial legislative reforms are developed.

The final report may recommend appropriate mechanisms for implementation. Decisions on whether and how to implement those recommendations would be matters for the Australian Government, and where legislative amendment is required, the Australian Parliament.

6.1 Changes to primary and subordinate legislation

Deeper or more foundational reform may require targeted amendments to primary legislation, supported by consequential or additional changes to subordinate legislation. The Review will consider the extent to which this may be necessary to address Triple Zero-specific gaps within the existing telecommunications legislative architecture, noting decisions would ultimately be a matter for the Australian Government and Parliament.

Amendments to primary legislation could also expand or reshape the scope of subordinate legislation, including the entities, services and matters that may be regulated. Any subsequent amendments to subordinate legislation would need to be made by the relevant rule-maker, including in response to a ministerial direction where an applicable direction power exists, and within the amended statutory framework.

Amending primary legislation would require formal legislative processes, including introduction, debate and passage by Parliament. The principal Acts within the potential scope of change are the Tel Act, the TCPSS Act and the *Australian Communications and Media Authority Act 2005*. Amendments to these Acts could define entities and objectives in ways that better reflect the modern telecommunications environment or the specific policy intent of the Triple Zero service. They could also provide new legislative bases for subordinate legislation and revise the objectives, entities and policy settings applying to existing subordinate legislation.

This pathway would also allow the Australian Government to assess whether existing subordinate legislation is operating as intended or contains gaps that could be addressed alongside amendments to primary legislation. Relevant subordinate legislation includes the ECS Determination, mobile device-related instruments and the CCO Standard.

6.2 Targeted changes to subordinate legislation

This approach would involve pursuing targeted reforms across the Triple Zero framework through subordinate legislation under existing primary legislation. These reforms could be relatively broad in coverage, including changes across several instruments, but would remain within the scope and limits of current statutory authority.

Relevant subordinate legislation includes the ECS Determination, mobile device-related instruments and the Telecommunications (Customer Communications for Outages) Standard 2024. Any amendments must be made within the scope and limits of current primary legislation. ACMA may only make a determination that relates to an emergency call service and imposes requirements on carriers, CSPs and ECPs. It could not use the

ECS Determination to broaden the range of regulated entities or expand the services covered by obligations under that instrument to include messaging or video.

7. Next steps

7.1 Purpose of the next phase

The next phase will test the emerging themes outlined in Section 5 against the scalable reform pathways outlined in Section 6. This will include considering whether potential reforms would improve public safety, support reliable access to emergency assistance, clarify roles and responsibilities, and provide a framework that can adapt to future technologies and delivery models.

The Review will also consider whether potential reforms are proportionate, technically feasible and capable of being implemented without creating unnecessary duplication, burden or uncertainty for industry, emergency service organisations, regulators, governments or consumers.

7.2 Targeted engagement

The Review will undertake targeted engagement to test the feasibility, benefits, limitations and implementation implications of potential reforms.

Targeted engagement will focus on issues including public safety objectives, future access methods, regulatory powers, information gathering and sharing, role clarity between ACMA and the Custodian, reporting and accountability arrangements, and implementation considerations such as timing, transition, cost, operational readiness and interactions with related reforms.

7.3 Option development and assessment

The Review will develop and assess reform options for the final report. This will include consideration of implementation factors such as timing, cost, operational impacts, sequencing, dependencies and interaction with related reforms.

Options will be assessed against the reform pathways outlined in Section 6, including whether issues can be addressed within current settings, through targeted legislative or regulatory change, or through more foundational reform.

7.4 Final report

The final report is due by 18 March 2027. It will provide recommendations to the Minister for Communications and Sport on the changes required to establish a modern, scalable and adaptable Triple Zero legislative and regulatory framework. The final recommendations will be informed by further evidence gathering, targeted stakeholder engagement, legal and regulatory analysis, option assessment and implementation analysis.