Triple Zero Legislative and Regulatory Review
Department of Infrastructure, Transport, Regional Development, Communications, Sport & the Arts
2 Phillip Law Street
CANBERRA ACT 2601

Dear Review Team,

ANCAP SAFETY welcomes the opportunity to provide a submission to the Triple Zero Legislative and Regulatory Review.

Background

ANCAP is Australasia's independent voice on vehicle safety. ANCAP's role is to encourage vehicle brands to design and build, and consumers to purchase and use, the safest vehicles possible. Our objective is to create an environment where vehicle brands continually strive for the highest level of safety. ANCAP acknowledges brands when their vehicles meet or exceed top performance and brings awareness to those vehicle models that can improve, in an effort to reduce road trauma. ANCAP's work is supported by our members, including the Australian Government, the New Zealand Government, Australian motoring clubs, and all state and territory governments.

Since the start of 2026, ANCAP has promoted the fitment of eCall systems in passenger vehicles through our assessment protocols. These systems, also known as automatic crash notification systems, automatically transmit data and establish a voice call in the case of a major crash, and have been mandatory in the European Union since 2018. As there is currently no ability for these systems to directly connect to the Triple Zero service in Australia, ANCAP currently rewards manufacturers for providing systems that route the emergency call through a third-party service.

Recommendations

ANCAP recommends that the Australian Government:

1. support amendments to the Triple Zero legislative and regulatory framework to enable direct access to the Triple Zero service by compliant vehicle-based eCall systems;
2. establish a pathway for vehicle eCall systems to be recognised as a permitted emergency access technology, subject to technical and operational requirements; and
3. support the development of an Australian vehicle eCall data standard, including a minimum data set and requirements for call-source identification, voice-and-data linking, privacy and data sharing.

Our full submission is attached. ANCAP's staff are available to share our expertise with the Review Team or the Department at any stage.

Yours sincerely

[redacted]

Carla Hoorweg
Chief Executive Officer
30 June 2026

ANCAP submission to the Triple Zero Review

Automatic crash notification systems

eCall systems, also known as automatic crash notification (ACN) systems, use sensors built into a vehicle to detect when a serious crash has occurred. Once triggered, the system notifies emergency responders and transmits relevant crash data to assist with the response. eCall systems rely on cellular networks to communicate with emergency response services or intermediaries, although some systems also use satellite communications.

These systems should be clearly distinguished from other types of automatic emergency call systems, such as smartwatches equipped with fall detection. Vehicle-based eCall systems rely on internal sensors such as airbag deployment sensors that are highly correlated with injury, and relatively unlikely to be triggered outside of circumstances where an emergency call is appropriate.

Rapid emergency response after a crash can be critical to the survival and recovery of vehicle occupants. Timely medical assistance can reduce the severity of injuries and help prevent fatalities. Delays are particularly dangerous in remote areas or where occupants are unable to call for help themselves. In addition to supporting emergency medical response, ACN data may also assist with broader incident management, such as activating roadside warnings or in-vehicle and navigation alerts to reduce the risk of secondary crashes.

eCall has been mandatory in new passenger cars sold in the European Union since 2018. In the EU, eCall systems are able to directly contact what are known as Public Safety Answering Points (PSAPs) – public systems which route and respond to emergency calls. In Europe, calls from eCall systems are differentiated from standard public emergency calls using a flag system that allows PSAPs to respond appropriately to different types of call.

eCall in the Australian context

ACN systems are particularly crucial in the Australian context. The majority of fatal crashes in Australia are single vehicle crashes, and many of those crashes occur in regional and remote areas. Trauma specialists repeatedly say that speed of response is vital to saving lives and preventing permanent disability when responding to serious trauma. This is particularly difficult when crashes occur in remote areas. Automatic notification when a crash occurs offers the opportunity to significantly improve the speed at which emergency services can respond to crashes.

While similar systems in Europe are able to directly connect to and communicate with emergency services, Australia's emergency call system – the Triple Zero system and associated services – does not currently offer this capability. As a result, automatic crash notification systems in Australian vehicles are forced to rely on commercial networks and third-party services. Importantly, this limits the ability of vehicles in remote areas to access the enhanced connectivity offered by the Triple Zero service. Currently, the Triple Zero service offers the ability for calls to be connected through any telecommunications network ("Camp-On") – while commercial providers, such as third-party intermediaries, are limited to the coverage of their network partner. This means that an autonomous crash notification made by a vehicle using an Optus SIM card, in an area with only Telstra coverage, may not be appropriately connected to emergency services.

ANCAP's existing work on eCall

ANCAP has collected information on the fitment of eCall systems to assessed vehicles since 2019. At the latest estimate, according to confidential market data, at least 40% of all new cars sold in Australia are fitted with some form of eCall technology.

At the start of 2026, ANCAP updated its assessment protocols to award points to vehicles with eCall and advanced eCall functionality. ANCAP awards points to systems that:

- send a data packet to a Third Party Service (TPS) provider advising that a vehicle has crashed, and at a minimum including the current latitude and longitude of the vehicle;

- establish a voice call in conjunction with the data packet;
- comply with the guidelines provided by the National Emergency Communications Working Group[1]; and
- are available to vehicle owners/users without any additional fees or charges for six years after vehicle purchase.

While ANCAP currently only rewards eCall systems that connect to a TPS provider, our protocol allows for points to be awarded to systems that connect directly to the public emergency call system when that functionality becomes available in Australia (or New Zealand for New Zealand market vehicles). Systems that connect to the public emergency call system may be preferable for a range of reasons, noting in particular that TPS providers may not continue to provide free services indefinitely.

A direct, standards-based pathway to Triple Zero would also reduce reliance on subscription-based or proprietary third-party service arrangements, supporting more equitable access to eCall benefits across vehicle owners.

The risk of non-genuine calls

Non-genuine calls are a consistent concern among emergency services and network operators in relation to the Triple Zero service. These calls impose real costs on the system and can cause capacity constraints. This has been regularly raised in relation to both vehicle emergency call systems and fall detection wearables.

ANCAP acknowledges that non-genuine calls impose real costs on the Triple Zero system and must be carefully managed. However, the risk profile of compliant in-vehicle eCall systems should be distinguished from personal-device automatic calling technologies. Vehicle eCall systems can be tied to robust crash indicators, such as airbag deployment or other vehicle crash sensor data, and can be subject to defined performance, testing and false-call mitigation requirements. This means direct access by compliant vehicle eCall systems can be managed through standards and approval conditions, rather than being treated in the same way as all autonomous contact technologies.

Reforms required to the Triple Zero system

There are regulatory and practical barriers that should be addressed to allow for the use of the Triple Zero system by eCall systems in connected vehicles. As a starting point, the principles guiding Triple Zero should be amended to support access to the Triple Zero service by vehicle emergency calls.

Regulatory barriers

The relevant regulations (the *Telecommunications (Emergency Call Service) Determination 2019* and related instruments) should be amended to create explicit pathways for direct eCall from vehicle systems. The following processes and requirements should be formally set out in regulation or associated guidance:

- Recognition of vehicular eCall as a permitted emergency call type, allowing for automatically activated calls from compliant vehicle eCall systems to access the Triple Zero service.
- Mandated data standards for eCall, including protocols to allow for the transmission of location, vehicle information, crash severity, number of occupants, and call type alongside a voice call.
- Obligations for the Triple Zero operator (currently Telstra) and for cellular service providers in relation to receiving and prioritising eCall connections.
- Specific guidance for vehicle manufacturers and system providers to ensure that the risk of false calls through autonomous contacts is minimised.

Addressing these regulatory barriers should be a priority for any reforms to the Triple Zero framework. The technical feasibility of these systems is not in question, as they have been operating successfully in Europe for more than seven years.

[1] NECWG National Guidelines for Autonomous Contact with Triple Zero (000) are found at https://necwg-anz.org/standards-and-guidelines/

Practical barriers

The uptake of eCall systems will require practical upgrades to emergency call systems and standards, alongside regulatory changes. Emergency call systems are primarily voice-only, and have limited capacity to receive the data provided by eCall systems – which is particularly vital in the context of location data where vehicle occupants have been incapacitated in a crash, and are unable to talk to the system operator.

In terms of Telstra as the current Triple Zero operator, upgrades to the system would be necessary to enable receiving, storing, and transmitting data from eCall systems. This would require an appropriate data standard, as well as updates to Telstra's infrastructure.

Emergency response centres and dispatch systems would also need to be updated to deal with the incoming eCall data provided to them by an updated Triple Zero system. This would likely mean incorporating data automatically into systems on receipt from the Triple Zero operator, and would again rely on the establishment of appropriate data standards. In the recent Austroads report into eCall systems[2] in Australia and New Zealand, these upgrades were noted as being technically feasible, with an indicative up-front cost in the vicinity of $5 million and ongoing maintenance costs of $1.25 million per system.

ANCAP understands that many of the hardware upgrades required are already planned at both the Triple Zero operator and emergency service organisation level, but configuration and software changes may be needed to support eCall.

Data standards and privacy

The benefits of vehicle-based eCall are best achieved when important data can be provided directly to emergency services. Location data is vital, but other data can provide valuable information to first responders. Australia does not need to replicate the European system in full, but the European Minimum Set of Data provides a useful starting point for an Australian vehicle eCall data standard. The European Union currently requires the following information to be provided through eCall as part of the Minimum Set of Data:

- whether the call was automatically or manually triggered;
- whether the call is a test call or a real emergency call;
- vehicle type;
- vehicle identification number (VIN);
- vehicle propulsion type;
- the time the eCall data message was generated;
- the vehicle's last known latitude and longitude; and
- the vehicle's last known direction of travel.

Advanced eCall systems may also use in-vehicle sensors to identify additional data about the vehicle and the crash, including (but not limited to):

- potential number of occupants;
- direction of impact and/or rollover;
- speed of impact;
- hazard identification – for example, fire or thermal runaway;
- transfer of paired mobile information (for example, a phone connected to the vehicle via Bluetooth);
- vehicle information including make, model and colour; and
- vehicle final position after crash.

All of this data can provide valuable information to first responders prior to arrival at the crash site. For example, information about vehicle propulsion type and potential thermal runaway can alert responders to specific types of fire or explosion risk.

---

[2] *AP-R737-25 eCall: Possible Approaches for Australia and New Zealand*, Austroads, August 2025 - https://austroads.gov.au/publications/connected-and-automated-vehicles/ap-r737-25

This data can only be used by emergency services if there are standardised data protocols in place for transmitting, storing, receiving, and using the data. There is an appropriate role for government in ensuring that there is a clear minimum data standard. However, any such standard should also be set in such a way as to not limit additional data being supplied where systems allow for it.

Governments will also need to consider privacy when designing standards and regulations for eCall data. Emergency call operators, vehicle manufacturers, and other partners will need clear rules around the appropriate use, disclosure, transmission, and storage of eCall data. Equally, consumers should be able to trust that the data collected as part of eCall systems is used for intended purposes.

Summary of ANCAP responses to consultation questions

Consultation question	ANCAP view
1. What principles should guide Triple Zero service regulation in the contemporary telecommunications environment? How should these be reflected in the legislative and regulatory framework?	The framework should support safe, reliable and standards-based access to Triple Zero by compliant vehicle eCall systems.
2. Are there any barriers in the current legislative and regulatory framework blocking access to the benefits of new delivery technologies which could be used to contact Triple Zero? If so, what aspects of the legislative and regulatory framework need to be amended to increase flexibility?	Yes. The current framework does not provide a clear pathway for direct vehicle eCall access to Triple Zero or for the receipt and transfer of eCall crash data. The *Telecommunications (Emergency Call Service) Determination 2019* and related instruments should be amended to recognise compliant vehicle eCall as a permitted emergency access method.
3. How should the legislative and regulatory framework balance multi-modal access to Triple Zero, when compared to reliability and redundancy?	The framework should allow new access methods where they can be delivered safely and reliably. Vehicle eCall should be considered separately from higher-risk autonomous calling technologies because it can be linked to robust vehicle crash triggers and technical standards.
4. Should the legislative and regulatory framework allow for the ACMA, and/or the Minister, to determine which class of devices or technologies should or should not be able to reach Triple Zero, in order to safeguard the integrity of access for the system?	Yes, for eCall-related purposes. ACMA and/or the Minister should be able to approve compliant vehicle eCall systems as a permitted class of technology, subject to technical, operational and false-call mitigation requirements.
5. Should mobile device manufacturers be considered more centrally in the Triple Zero legislative and regulatory framework? What, if any, additional requirements should apply to mobile device manufacturers to ensure mobile devices can reliably contact Triple Zero on Australian networks?	ANCAP's interest is in vehicle eCall rather than mobile devices. To the extent the framework addresses device-side emergency calling, it should also recognise the role of vehicle manufacturers and in-vehicle system providers where their systems initiate eCall contact.
6. What outcomes should carriers, CSPs and ECPs be accountable for in delivering Triple Zero calls, and what minimum requirements are needed to achieve those outcomes?	For vehicle eCall, the framework should require reliable carriage, recognition and transfer of compliant eCall contacts, including the ability to link the voice call with associated crash data and route both to the relevant emergency service organisation.
7. How could the framework be amended to further provide obligations to support the proactive identification and rectification of systemic issues? What mechanisms are most effective, and why?	For vehicle eCall, the framework should support pre-deployment testing, certification or approval of compliant vehicle eCall systems, monitoring of false-call rates, and remediation where technical or operational issues affect Triple Zero access.
8. Should new and ongoing performance reporting for carriers and/or CSPs providing access to Triple Zero be introduced? If yes, what metrics should be reported and how often?	ANCAP supports vehicle eCall-specific reporting where direct vehicle eCall access is enabled. Relevant metrics could include eCall volumes, successful and failed transfers, data transfer success, call-source identification, and non-genuine call rates where known.
9. What information is and should be shared across industry and/or ESOs to support the proactive, reliable and future-proof delivery of Triple Zero? What governance	For vehicle eCall, emergency services should receive the minimum crash data needed to support rapid response, including location, direction of travel or recent locations, trigger mode, vehicle type or

Consultation question	ANCAP view
arrangements are needed to enable timely, secure and usable information sharing?	identity, propulsion type, crash severity indicators and number of occupants where available.
10. Does the objective of the single national emergency call system encourage, or hinder, the ability for state and territory organisations to innovate in their delivery of emergency calling and dispatch services?	A single national baseline is important for vehicle eCall because vehicles operate across jurisdictions and manufacturers need consistent requirements.
11. Is there information that carriers, CSPs, and ECPs hold which is not currently, but should be made available to ESOs through regulation to support the delivery of emergency services?	Where direct vehicle eCall is enabled, ESOs should receive the relevant eCall minimum data set in real time, alongside the associated voice call, to support triage and dispatch.
12. Are there any additional regulatory powers and mechanisms the ACMA requires to regulate Triple Zero, especially to support a framework which is proactive and future-focused?	For eCall, ACMA should have sufficient powers to support direct vehicle eCall access, including testing, approval, reporting and remediation requirements if needed.
13. Are there barriers to the ACMA considering systemic Triple Zero issues, or linking related infringements, to ensure issues indicating broader problems are addressed appropriately? If yes, what should change?	*No ANCAP position.*
14. Do recent changes to the TCPSS Act effectively balance the role of the ACMA as a regulator with the role of the Custodian as an entity which oversees the Triple Zero ecosystem as a whole?	*No ANCAP position.*
15. Does the Triple Zero Custodian have all the powers needed to fulfil its functions under the TCPSS Act?	*No ANCAP position.*