Australian Telecommunications Alliance

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AUSTRALIAN TELECOMMUNICATIONS ALLIANCE SUBMISSION

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

Re: Triple Zero Legislative and Regulatory Review

30 June 2026

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1. AUSTRALIAN TELECOMMUNICATIONS ALLIANCE

The Australian Telecommunications Alliance (ATA) is the peak body of the Australian telecommunications industry. We are the trusted voice at the intersection of industry, government, regulators, and consumers. Through collaboration and leadership, we shape initiatives that grow the Australian telecommunications industry, enhance connectivity for all Australians, and foster the highest standards of business behaviour. For more details, visit www.austelco.org.au.

For questions on this submission, please contact info@austelco.org.au.

2. RESPONSE TO THE CONSULTATION – SUMMARY

2.1 SUMMARY

The Australian Telecommunications Alliance (ATA) welcomes the opportunity to provide this submission in response to the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (DITRDCSA) public consultation paper on the *Triple Zero Legislative and Regulatory Review*.

The main themes in the submission are:

(a) An adherence to the long-standing principle of technology neutrality in legislation and not regulating speculative or unknown technologies until there is sufficient clarity on them, along with creating a modular framework which allows changes in technologies to be accommodated over time.

(b) The importance of end user device compatibility in the end-to-end Triple Zero ecosystem including the need to strengthen the compliance of the device supply chain and to establish a public register of compliant end user devices, consistent with earlier submissions from the ATA on the subject.

(c) Continuing reforms of the *Telecommunications (Emergency Call Service) Determination 2019* (ECSD). This is a key part of this general review of legislation and regulation related to Triple Zero services.

(d) Optimise reporting requirements. The ATA is not opposed to modified reporting requirements for its members but there must be demonstrable benefits and they must also be practical and not create an undue compliance burden.

(e) The opportunity for the Triple Zero Custodian (Custodian) to become a central operational hub for gathering and sharing information across the ecosystem (from device suppliers through to Emergency Service Organisations (ESOs)) and with external parties, coordinating responses to incidents involving multiple parties, and running post incident reviews and similar forums to improve the ecosystem.

3. AUSTRALIAN TELECOMMUNICATIONS ALLIANCE

The ATA responds to the questions posed in the Consultation Paper with each question from the consultation paper reproduced under the corresponding heading in italics, followed by the ATA response as numbered paragraphs.

The ATA also makes points relevant to the review that are not addressed directly in the consultation paper.

3.1 LEGISLATIVE PRINCIPLES FOR ACCESS

Question 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?

3.1.1 The ATA submits that the legislative and regulatory framework for Triple Zero (the framework) should be guided by the principles of technology neutrality, reliability, integrity, clarity of accountability, proportionality, national consistency, transparency and adaptability. The current environment is no longer characterised by a single network operator and a uniform customer device base. Instead, emergency service access depends on an increasingly complex ecosystem which includes various transmission paths (e.g. fixed, mobile and satellite) in which the device capability, software behaviour, network operation and coordination across multiple actors may all affect outcomes.

3.1.2 In the ATA's opinion, the framework should remain focused on end-user outcomes of genuine public significance: enabling the ability to contact emergency services via various communication paths, using various devices and multiple contact solutions including voice, messaging and data to provide an appropriate access path to all users, reliably, free of charge, and in a manner that supports public confidence in the system.

3.1.3 The ATA also submits that technology neutrality (i.e. applying the same principles to a range of existing and future technologies) should not be misunderstood as automatic technical equivalence (i.e. expecting all technologies to perform at the same level) between all current and emerging access modes.

Question 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?

3.1.4 The ATA considers that the current framework retains assumptions and structural features inherited from an earlier era in which access to Triple Zero was delivered using voice communications through fixed-line and conventional mobile voice telephony services. The consultation paper correctly identifies that new access technologies such as LEOSat direct-to-device services and various devices, including vehicle emergency calls, wearables, satellite-enabled emergency messaging, using various forms of communication such as voice, messaging and data are not fully contemplated by the legacy framing of the current arrangements.

3.1.5 The ATA submits that reform is required to enable the framework to recognise, assess and, where appropriate, support new access technologies, device access and forms of communication in a staged and evidence-based manner. A key barrier is the absence of a clear mechanism for treating new access technologies as potential emergency access pathways while still preserving a disciplined assessment of whether new access technologies are fit for purpose, reliable can be integrated operationally. In the ATA's view, flexibility should be increased via clearer powers and processes for testing and review, rather than by assuming that all technically possible access methods should be treated as an equivalent emergency access channel by default.

3.1.6 The ATA also notes that the regulatory framework should account for all elements of the end-to-end Triple Zero ecosystem. The ATA's work on a device register has highlighted that current point-of-supply arrangements under the Telecommunications Labelling Notice (TLN) and Regulatory Compliance Mark (RCM) regime do not adequately address post-supply software changes, refurbished devices, or grey-market imports, nor the various other types of access tools that an emergency service caller might use

(e.g. medical alert dongles, connected vehicles, IoT devices, etc.). In that respect, the TLN / RCM arrangements must incorporate improved device lifecycle visibility and assurance. Consideration should be given to updating the *Telecommunications (Consumer Protection and Service Standards) Act 1999* (TCPSS Act) to allow the ECSD (and other regulatory instruments if required) to address device suppliers for matters that cannot be adequately addressed in the TLN.

3.1.7 The ATA considers it important to set minimum standards for new access technologies and guardrails for automated/device-initiated calling to manage false activations, non-genuine traffic, and ESO demand.

3.1.8 A modular approach to the future framework would also be helpful for enabling it to adapt as new and existing technologies evolve, e.g. use the core ECSD to establish generic principles and outcomes and then provide specific requirements for each technology in subordinate instruments.

Question 3. How should the legislative and regulatory framework balance multi-modal access to Triple Zero, when compared to reliability and redundancy?

3.1.9 Additional modes of access can improve reach, empower non voice-first generations, strengthen access for people with disabilities and provide consumer convenience, but only where they are sufficiently reliable, understandable to users, operationally integrated, and do not introduce a net reduction in system integrity (where technically feasible). The existence of a technically possible access mode does not establish that it should be treated as a fully equivalent emergency access pathway. Any new mode of access is not automatically substitutable for voice calls to Triple Zero but might help as an alternative option relative to such calls. Each new mode would require assessment of its benefits and whether it should be part of the existing framework or sit outside it.

3.1.10 Section 11(2)(a) of the ECSD relates to the diversity and redundancy of carriers and CSPs when it comes to emergency calling; this aspect of the ECSD would need to be updated to reflect appropriate and proportionate requirements for new and emerging technologies. In addition, this section would need to be aligned to reflect what is realistically achievable across different network components today, recognising that full access network redundancy is not viable.

3.1.11 In the ATA's view, the framework should distinguish between core national baseline access technologies (e.g. existing voice services for emergency calls, supported by all states and territories) and supplementary or emerging access technologies (e.g. Emergency Plus app, BluLink) and their associated devices. Supplementary access modalities may be beneficial, but the law and related public communications should avoid creating user assumptions that all access modalities provide the same level of assurance. This is especially important in an environment where emergency service access may now depend on varying device configurations, software states, coverage conditions and operational dependencies.

3.1.12 As mentioned in 3.1.9, a modular approach to the future framework would be helpful for enabling it to adapt as new and existing technologies evolve.

Question 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?

3.1.13 The ATA supports, in principle, a framework in which the regulator has the ability to determine that particular classes of devices or access technologies should be restricted or subject to conditions where there is credible evidence that they present a material risk to the integrity of emergency access.

3.1.14 The existing framework already includes proactive device-blocking and risk management concepts, and the ATA has engaged with ACMA on improvements to the ECSD in this area. An ACMA-led framework would support practical decisions and technical alignment, with policy set by the DITRDCSA and Minister.

3.1.15 However, the ATA considers that such powers should be constrained by clear technical criteria, robust evidence, appropriate consultation, remediation pathways and transparency of decision-making. A broad or opaque power to exclude technologies or device classes would risk arbitrary outcomes, market uncertainty and poor incentives.

3.1.16 The ATA's work on a device compliance register is relevant here because exclusion or blocking powers are

significantly more effective and proportionate when supported by an authoritative compliance and status information base and public awareness.

3.1.17 Consideration should be given to including device(s) in a proposed register where they are capable of initiating a request for emergency assistance via the ECP. This device register is discussed in more detail in sections 3.1.6, 3.6.3 and 4.1.

3.2 THE INTERDEPENDENCY OF MOBILE DEVICES AND NETWORKS

Question 5. Should mobile device manufacturers be considered more centrally in the Triple Zero legislative and regulatory framework (such as under the ECS Determination)? What, if any, additional requirements should apply to mobile device manufacturers to ensure mobile devices can reliably contact Triple Zero on Australian networks?

3.2.1 The ATA considers that all aspects of the Triple Zero ecosystem, including device manufacturers, importers, distributors, retailers, refurbishers and Carriers/CSPs, should be covered by the framework. Software updates, spectrum changes and network reconfiguration can all affect emergency calling outcomes.

3.2.2 The ATA's recent policy work has likewise identified that post-supply software behaviour and mobile device lifecycle issues create risks that are not well addressed by the existing point-of-supply compliance model alone. We also propose the regulation of refurbishers as accountable supply chain entities, with enforceable obligations to ensure devices re-entering the Australian market - including those sourced from jurisdictions without the RCM - continue to meet emergency calling and technical compliance requirements.

3.2.3 In the ATA's view, the objective should not be to impose an unbounded or bespoke Australia-only device liability regime. Rather, the objective should be to improve transparency, accountability and lifecycle assurance in relation to device compliance and emergency calling capability.

3.2.4 The ATA also submits that the regulatory framework should better reflect the distinction between point-of-supply compliance and ongoing in-market suitability. The current TLN / RCM arrangements are capable of demonstrating compliance at supply, but they are not, by design, a complete lifecycle assurance regime. That is a material weakness in an environment where post-supply software changes and network evolution can affect emergency calling behaviour and where there is a retail path supplying end of life and non-Australian Standards approved devices to consumers.

3.2.5 While mobile phones are the current focus, other devices intended to provide access to emergency services (e.g. eCall, fall detection devices, wearables and other connected emergency communication devices) should also be held to the same lifecycle assurance considerations and therefore be included in any device compliance register.

3.3 PRINCIPLES-BASED APPROACH TO ENSURING TRIPLE ZERO CALLS ARE SUCCESSFULLY CARRIED

Question 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?

3.3.1 The ATA submits that accountability should continue to attach to the parts of the emergency calling chain that each entity delivers and can reasonably control. For example, Carriers and CSPs who currently supply voice services enable emergency access on their networks, carry calls to the relevant termination point, manage material network changes, prioritisation and continuity planning, and provide relevant operational information.

3.3.2 The framework should allow flexibility, including exemptions or safe harbours for planned maintenance and factors beyond reasonable control.

3.3.3 Recognising end-user devices and suppliers as integral to the Triple Zero ecosystem, and ensure relevant parties are appropriately captured under legislation such as the ECSD where device behaviour affects emergency communications outcomes.

3.3.4 In the ATA's view, minimum requirements should be practical and evidence-based. Recent work undertaken by the ATA and industry members has delivered a useful foundation, including the C674:2025 Emergency Calling – Network and Mobile Phone Testing Industry Code, revisions to customer equipment standards under AS/CA S042, and code/guideline changes relating to remote network management tools and redundancy for emergency calls (refer to section 5 for a list of ATA documents related to emergency communications). These mechanisms are stronger and more useful than general obligations because they impose observable, testable controls and enable proactive risk management.

3.3.5 The ATA also submits that the framework should avoid creating an unrealistic impression that Carriers or CSPs can guarantee call completion in every scenario involving unsupported customer-supplied devices, unknown software states, or non-compliant imported equipment. The current ecosystem involves multiple actors and technical dependencies. Accountability should therefore be clear, but it should not be built on false assumptions about control.

Question 7. How could the framework be amended to further provide obligations to support the proactive identification and rectification of systemic issues? What mechanisms (for example, incident learnings, mandatory improvement plans, directions, audits) are most effective, and why?

3.3.6 The ATA supports a framework for identifying and rectifying systemic emergency-calling risks. In the ATA's view, the most effective mechanisms include those that move beyond post-incident diagnosis and instead build structured prevention, independent testing, risk visibility and remediation pathways into the framework itself.

3.3.7 The ATA considers that the most useful mechanisms include periodic independent end-to-end testing in a controlled test facility, sharing of technical information about identified device issues (e.g. via timely updates of a proposed device register), clear remediation pathways where software fixes are available, and feedback mechanisms that allow identified issues to inform standards evolution and regulatory improvement. The ATA's prior submissions and correspondence to the Custodian describe ongoing work in these areas, including C674:2025 testing, information-sharing by the DETEST Working Committee and ECSD reform proposals.

3.3.8 Incident learnings are important, but the ATA cautions against a regime that relies too heavily on ex post reviews without a clear path to make use of the review output. A report that identifies a systemic weakness but does not trigger measurable remediation is of limited preventive value. The framework should therefore support investigation and structured implementation and review of corrective action where systemic issues are identified.

3.3.9 A possible model for proactive management of systems within the control of a Carrier or CSP to consider is that of risk management plans that are aligned with an end-to-end risk management plan for the ecosystem by the Custodian, without duplicating other, similar obligations e.g. risk management plan as required under the *Security of Critical Infrastructure Act 2018*. This would allow for an appropriate, proportionate assessment of what risks might exist and how to manage them.

3.3.10 Before:
(a) any new risk management obligations are introduced, and
(b) the Custodian adopts a risk management framework that outlines how it supervises/mitigates risks across the end-to-end delivery of emergency communications,
Carriers and CSPs need greater clarity on:
(c) role clarity for the Custodian (and other stakeholders) on the operational boundaries between the Custodian and other government entities (also refer to similar comments in section 4), and
(d) expectations under the *Security of Critical Infrastructure (Telecommunications Security and Risk Management Program) Rules 2025*. Specifically, relevant guidance (https://www.cisc.gov.au/resources-subsite/Documents/telecommunications-guidance.pdf) indicates the scope of these obligations includes managing the risk of an impairment to critical assets, including emergency services.

3.4 REPORTING

Question 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?

3.4.1 The ATA supports, in principle, the development of meaningful supplementary performance reporting in relation to the parts of the emergency access chain controlled by carriers and CSPs. The consultation paper correctly observes that current mandatory performance reporting focuses heavily on ECPs and does not provide visibility of other aspects of the broader delivery chain for emergency calls.

3.4.2 That said, the ATA cautions that reporting obligations should be designed to produce useful and credible information, with a clear purpose in mind. Without a clear purpose and careful checking and design to ensure the reporting is fit for that purpose, there is a risk of burdening industry with additional obligations that are of very limited public or practical benefit. Metrics, definitions, thresholds and reporting formats should be objective and standardised, ensuring that information is reported consistently across carriers.

3.4.3 Care also needs to be taken in the exercise of translating the data industry provides to the Custodian or ACMA into information suitable for publication (as well as on what should be confidential and what should be public). Otherwise, there is a risk of the public being confused or misled or the reporting having other unintended consequences. For example, the ATA notes from earlier work that not all device-related conclusions can be robustly inferred from network data alone, especially where device populations are small or physical testing is not feasible. Accordingly, any new reporting obligations should be tested against operational utility, technical feasibility and the risk of false precision.

3.4.4 As a matter of general principle, based on our experience of device related reporting to date, we recommend that reporting by Carriers/CSPs is confined to the network side of the air interface (i.e., not device-side performance/assumptions). We also recommend that any public reporting on network performance is done by the Custodian and on an aggregated basis, rather than Carrier by Carrier. Interrogation and consolidation of reporting data by the Custodian will be important to ensure consistency of reporting methodology across networks. Aggregation is appropriate given the ability of end-users to make emergency calls from any available mobile network, not just their own, and should help to improve public confidence in the overall Triple Zero network ecosystem in Australia.

3.4.5 The ATA notes that the current ECS Directions process may provide a practical basis for testing which metrics are genuinely informative before embedding permanent prescriptive reporting requirements.

Question 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 arrangements are needed to enable timely, secure and usable information sharing?

3.4.6 The ATA supports improved and better-governed information-sharing across the Triple Zero ecosystem. The ATA's own recent work demonstrates both the value of such sharing and the importance of governance. The DETEST group has evolved to support the sharing of technical information about identified device behaviours and test results, and the ATA has also proposed a more authoritative information base through a device compliance register model.

3.4.7 The ATA also notes from recent experience that poor visibility and weak coordination of material technical or operational changes can themselves create significant risk. The ATA's recent correspondence on the proposed AusAlert Android restart mechanism highlighted concerns including limited visibility of rollout methodology, inadequate advance engagement with operators, lack of clear pause or halt mechanisms, and the possibility of network and consumer impacts from poorly governed implementation at scale. In the ATA's view, this example demonstrates why information-sharing obligations must be timely, operationally useful and tied to defined governance arrangements, rather than treated as a generic aspiration.

3.4.8 The ATA submits that information-sharing arrangements should be governed by defined purpose, secure handling arrangements, role-based access, escalation pathways for time-critical issues, and clear accountability for data quality and actionability. "More sharing" is not enough. The framework should identify what is to be shared, with whom, for what operational or regulatory purpose, and under what controls.

3.4.9 The ATA would support the Custodian taking a more active role in acting as a centralised hub, where it could manage and facilitate the exchange of information between all stakeholders with the Custodian collecting, validating and sharing operational information, replacing fragmented approaches (especially during an outage event). An existing governance model for this type of coordination role is the National Cyber Security Coordinator (NCSC) established by the *Cyber Security Act 2024* (Cth). The limited-use obligations associated with the NCSC support better information sharing practices during time sensitive events. This would involve the definition of clear, standardised information flowing into the Custodian from all participants (e.g. carriers, CSPs, the ECP, ESOs, ACMA and government), using agreed triggers, data fields and formats. This would position the Custodian as the single source of truth for system status, outages, risks, incidents, planned changes and key communications. This would allow the creation of a Custodian-managed online dashboard, providing a controlled end-to-end view of system status, outages, risks and incidents. A trusted information sharing/learning environment should be created where potential compliance issues are not automatically escalated to ACMA.

3.4.10 To facilitate "timely, secure and usable information sharing" the framework should include exemptions or safe harbours for planned maintenance and factors beyond reasonable control (as mentioned above in 3.3.2).

3.5 THE LEGISLATIVE FRAMEWORK'S IMPACT ON ESOS

Question 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?

3.5.1 The ATA supports the continued objective of maintaining a national emergency call system that delivers consistent outcomes for all Australians. That objective remains important for consumer understanding, baseline national consistency and public confidence. The ATA does not consider that this objective should be abandoned or diluted. Whether that might be achieved by a centralised call answering model, a distributed call delivery model or some hybrid model is something to explore with stakeholders, including ESOs, in the coming years.

3.5.2 However, the ATA also considers that the framework should better accommodate structured and complementary state or territory innovation where such innovation can improve emergency response outcomes without fragmenting the national baseline or confusing end users. The consultation paper acknowledges examples such as BluLink operating outside the native Triple Zero call process. The ATA's view is that the national baseline should remain intact, while mechanisms for interoperability, supplementation and managed innovation should be improved where appropriate.

3.5.3 New access technologies should be supported by minimum national standards and should only be launched where ESOs can operationalise them and a clear, funded implementation roadmap exists. There should be more co-ordinations between the National Emergency Communications Working Group (NECWG), ECP, government and industry to develop and co-ordinate future access technology solutions.

3.5.4 The ATA notes that end-to-end visibility and outcomes can be enhanced by formally including ESOs through appropriate agreements e.g. through a Memorandum of Understanding (MoU) between the relevant federal and state/territory organisations.

Question 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?

3.5.5 The consultation paper notes that recent reforms have already strengthened certain outage-related information-sharing requirements.

3.5.6 In the ATA's view, any expansion of mandatory information-sharing with Emergency Service Organisations (ESOs) should be grounded in operational utility, technical feasibility, secure handling and clearly defined purpose. The objective should be to provide ESOs with information that supports timely operational decisions, not to create undefined or open-ended access obligations.

3.5.7 As mentioned earlier, to facilitate "timely, secure and usable information sharing" the framework should include exemptions or safe harbours for planned maintenance and factors beyond reasonable control (as mentioned above in 3.3.2 and 3.4.10).

3.5.8 In the ATA's experience, system effectiveness is improved when information is timely, usable and directed to a clear operational need.

3.5.9 The ATA sees benefits in developing a standardised template to assist in welfare checks to ensure the supply of relevant information is consistently implemented between carriers, the ECP and ESOs.

3.5.10 As per the proposal in 3.4.9 under Question 9, enabling the Custodian to play the role of a centralised hub would allow ESOs access to system-level operational detail that would be beneficial for them in terms of having awareness of the end-to-end emergency services environment.

3.5.11 The ATA does not, at this stage, propose a definitive list of additional data fields or categories that should be mandated across the entire ecosystem. This is an area where further focused engagement between industry, ECPs, ESOs, ACMA and the Custodian would be valuable before developing more prescriptive obligations.

3.6 ACMA'S POWERS TO PROACTIVELY REGULATE ACCESS TO TRIPLE ZERO

Question 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?

3.6.1 The ATA submits that the core issue is not simply whether ACMA should have additional powers, but whether the framework equips ACMA to identify, assess and respond to systemic risk in a disciplined and future-focused manner. Effective proactive oversight depends on visibility, testing, structured reporting, and the ability to require meaningful remediation where risks are identified.

3.6.2 The ATA supports ACMA having powers sufficient to obtain relevant information, conduct or require targeted audits or reviews, and direct action where there is credible evidence of material systemic risk to emergency access. However, the ATA does not support undefined or highly discretionary powers that are not anchored in evidence, process and accountability. In the ATA's view, stronger powers without discipline would create uncertainty without necessarily improving system performance.

3.6.3 A centralised device register would help mitigate risks from non-compliant devices by providing a single, authoritative source of device capability and compliance with emergency calling requirements. It would improve transparency, support earlier identification of high-risk devices, and assist stakeholders across the ecosystem. However, its effectiveness depends on ACMA having clear, enforceable powers to mandate inclusion, ensure data accuracy, and address non-compliance. Without this, the register risks being incomplete and of limited regulatory value. Its effectiveness also depends on ACMA monitoring compliance and enforcing it as required.

3.6.4 Separately, ESOs sit largely outside the Commonwealth framework, limiting visibility of performance beyond call transfer and making it difficult to assess end-to-end outcomes or identify the source of issues. This results in an incomplete view of the emergency call pathway, weakening accountability and system-wide risk management. A more integrated framework is needed to improve ESO data sharing, performance visibility, and coordination, while recognising State and Territory responsibilities.

Question 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?

3.6.5 The ATA considers that systemic Triple Zero issues often arise across organisational and technical boundaries. Device design, software states, network behaviour, standards assumptions, consumer information and operational coordination can all contribute to an outcome, and they do not align neatly with a single regulatory silo. The ATA's previous submissions on Triple Zero have consistently described the ecosystem in those terms.

3.6.6 In the ATA's view, the regulatory framework should better support ACMA in connecting recurring patterns and related risks across its various powers and information sources. This should include the ability to consider repeated similar incidents, patterns of issues identified through testing, or recurring device/network interaction problems as part of a broader systemic assessment, rather than only as isolated discrete events. At the same time, the ATA cautions that superficial correlation should not be mistaken for proof of a single root cause. Systemic conclusions should remain evidence-based.

3.6.7 The current framework largely captures ECP performance, despite the multi-party nature of emergency call delivery, limiting end-to-end visibility and the ability to identify systemic issues. This is compounded by gaps in regulatory scope - particularly for device manufacturers and ESOs - which sit outside ACMA's remit, reducing its ability to aggregate issues and identify system-wide risks.

Question 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?

3.6.8 The ATA considers that the current high-level division of roles is broadly sensible. ACMA remains the formal regulator and enforcement body, while the Custodian has a broader oversight, coordination and operational role across the ecosystem. The consultation paper describes the Custodian as supporting system preparedness and effective functioning, rather than operating as a parallel regulator. The delineation of roles between ACMA and the Custodian is still evolving, requiring further clarification to avoid overlap and regulatory uncertainty (refer to section 4 below for examples).

3.6.9 The more important issue is operational clarity. In the ATA's experience, the effectiveness of the current model will depend on clear boundaries, coordinated information requests, well-defined escalation pathways and a disciplined approach to who leads on which issue. The ATA has already engaged with the Custodian on matters including consultation, device issues and testing/software update arrangements, and the value of that engagement will be greatest where the relationship between oversight and formal regulation remains clear in practice.

Question 15. Does the Triple Zero Custodian have all the powers needed to fulfil its functions under the TCPSS Act?

3.6.10 The ATA submits that a broad further expansion of the Custodian's powers is not necessary. The consultation paper records that the Custodian already has a range of functions concerning preparedness, response, recovery, oversight and related matters. In the ATA's view, any case for additional powers should be closely tied to an identified practical gap rather than framed in general terms.

3.6.11 The ATA does, however, support ongoing review of whether the Custodian has sufficient tools to facilitate effective information-sharing, coordination and preparedness across the ecosystem, particularly where issues cross institutional and technical boundaries. The ATA's present position is that experience under the current model should continue to inform that assessment before contemplating any major further expansion.

3.6.12 The Custodian should be focused on its coordination role (e.g. reviewing systemic issues) and ACMA should focus on the enforcement part of its regulatory role.

3.6.13 The ATA proposes for the Custodian to act as the central hub with a secure operational dashboard (as referred to in 3.4.9 under Question 9), with role-based access and appropriate security, privacy and legal safeguards.

3.6.14 Finally, the ATA supports structured information sharing with government stakeholders and, where appropriate, public communications to uphold transparency and maintain public trust.

4. OTHER MATTERS

"Stakeholders are invited to raise any other matters, issues, opportunities or principles that should be considered."

4.1 TRANSPARENCY – A DEVICE REGISTER, SOFTWARE UPDATES AND CHANGES, PUBLIC SAFETY

4.1.1 The ATA invites the Review to consider whether transparency should form a more explicit part of the future framework. The ATA's recent policy work has highlighted that device compliance, emergency-calling capability, consumer understanding and regulatory oversight are currently hindered by the absence of a single authoritative source of information concerning device status, responsible suppliers and relevant compliance evidence. Improved transparency would not, by itself, solve all emergency-calling risks, but it would materially improve confidence, coordination and the operation of the broader framework.

4.1.2 The ATA also submits that the framework should be more explicit in addressing lifecycle assurance for devices and software-dependent emergency calling capability. A regime that relies too heavily on point-of-supply assumptions is increasingly fragile in a market characterised by post-supply developments, refurbished devices, network evolution and increasing interdependency between device and network behaviour.

4.1.3 Finally, the ATA submits that the framework should recognise the public-safety significance of major operational or software changes even where those changes arise outside a conventional outage context. Recent industry experience in relation to national-device update proposals for AusAlert demonstrates that public safety systems can also be affected by poor change governance, limited rollout visibility and inadequate coordination around implementation. That lesson is relevant to a future-focused Triple Zero framework.

4.2 DELAYS TO INNOVATION IN EMERGENCY COMMUNICATIONS

4.2.1 Section 4 of the consultation paper includes that the "*section seeks views about whether Commonwealth legislative and regulatory settings support innovation in the delivery of emergency response services in state and territory jurisdictions.*". Then Question 10 in the consultation paper asked "*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?*"

4.2.2 A related and important question is "*What barriers exist that encourage, or hinder, the ability for state and territory organisations to innovate in their delivery of emergency calling and dispatch services?*". The consultation paper mentions "*that internal business decisions by MNOs can impact ESO resourcing beyond what is set by the regulatory framework*" but anecdotal industry reports suggest the greatest hindrance to innovation for emergency communications is the lengthy duration of decision making at the federal government level e.g. approvals for pilots, testing and rollouts of new features and functions.

4.3 OVERLAPPING ROLES OF THE CUSTODIAN AND OTHER FEDERAL REGULATORY ACTIVITIES

4.3.1 Questions 12 and 15 in the consultation paper asked "*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?*" and "*Does the Triple Zero Custodian have all the powers needed to fulfil its functions under the TCPSS Act?*", respectively.

4.3.2 Before looking for additional powers, a related and important question is "*Where are the boundaries between the Custodian and ACMA?*". The ATA would welcome more clarity on the division of responsibility between ACMA and the Custodian as the Custodian functions defined in the TCPSS Act do not provide sufficient clarity on this. This risks an overlap of responsibility, or possible misunderstanding of responsibilities, with unintended consequences such as duplicated reporting obligations.

4.3.3 An example of overlapping reporting obligations is the Custodian's *Custodian Triple Zero Notification Protocol* and ACMA's *Telecommunications (Customer Communications for Outages) Industry Standard 2024*.

4.3.4 Similarly, another important question is "*Where are the boundaries between the Custodian and other federal entities?*". The ATA would welcome clarity on the apparent overlap between the Custodian's *Triple Zero Notification Protocol* and the Department of Home Affairs (DoHA) reporting obligations for changes in operational status of critical infrastructure assets (e.g. unplanned outages) under the *Security of Critical Infrastructure Act 2018*.

4.3.5 The multiple reporting obligations referenced above, with each one understandably important to inform evidence-based decision making, potentially (in aggregate) are in conflict with the intent of regulatory policy in s4 of the *Telecommunications Act 1997*.

4.4 OPERATIONAL ROLE OF THE CUSTODIAN

4.4.1 Section 5 of the consultation paper mentions one of the functions of the Custodian is "*aiding preparation for, response to or recovery from an emergency call service outages*".

4.4.2 While the Custodian has a 24 x 7 contact, the current operation of the Custodian is effectively business hours on weekdays, excluding weekends and public holidays. This meant following notifications sent by the relevant Carrier in response to a recent (i.e. mid-late June) major outage, it was the ECP that facilitated information flows among other Carriers and the ESOs during the event and as part of recovery from the outage. This is an example where the Custodian's coordination role would have been welcomed. To effectively fulfil its functions, the ATA recommends the Custodian should change to a 24 x 7 operation if it is to effectively respond to an emergency call service outage and fulfil a function of co-ordination during an event that impacts upon successful delivery of emergency calls.

4.4.3 The ATA understands a 24 x 7 operation of the Custodian would be consistent with the report from the steering committee chaired by the TIO that scoped the role, functions and structure of the Custodian.

5. ATA PUBLICATIONS RELATED TO EMERGENCY CALLING

5.1 INDUSTRY CODES

5.1.1 Below is a list of ATA industry codes related to emergency calling.

C525:2023 Handling of Life Threatening and Unwelcome Communications Industry Code, incorporating a 2024 amendment to align with legislation

https://www.austelco.org.au/publication/c525/

The Code provides standard procedures for the cooperative handling (including call tracing) by carriers, carriage service providers and the national relay service provider of communications across networks that are life threatening or connected with a pattern of unwelcome communications. The Code also outlines when carriers, carriage service providers and the national relay service provider can deal with unwelcome call complaints relating to non real-time communications such as SMS, MMS and email.

C536:2020 Emergency Call Services Requirements (Incorporating Variation No.1/2025) Industry Code

https://www.austelco.org.au/publication/c536/

The objectives of the Code are:

(a) to ensure all end users of an Emergency Telephone Service (ETS) have Access to the Emergency Call Service (ECS) in case of emergencies or where a response is required from an Emergency Service Organisation (ESO);

(b) to ensure the operational effectiveness of the Telecommunications (Emergency Call Service) Determination;

(a) to ensure that significant obligations of Carriers and Carriage Service Providers (CSPs), in relation to the ECS, are clearly documented and understood;

(a) to promote public understanding and appropriate use of the ECS (e.g. via www.triplezero.gov.au); and

(a) to ensure effective communications of information between relevant parties where technical issues affect the operation of the ECS.

C674:2025 Emergency Calling – Network and Mobile Phone Testing Industry Code

https://www.austelco.org.au/publication/c674/

The Code is designed to provide requirements for Nominated Mobile Network Operators (MNOs) to support testing to demonstrate and document:

(a) selected Mobile Phones have the ability to make Emergency Calls on an alternate network when:

  a. there is a lack of coverage from the Home Mobile Network; or

  b. the Radio Access Network (RAN) of the Home Mobile Network has Wilted; and

(b) behaviours of the selected Mobile Phones in various network test failure scenarios.

5.2 STANDARDS

5.2.1 Below is the ATA Australian Standard that defines the emergency calling capability of mobile devices.

AS/CA S042.1:2025 (incorporating Amendment No.1/2026) Requirements for connection to an air interface of a Telecommunications Network— Part 1: General Standard

https://www.austelco.org.au/publication/as-ca-s042-1-2025/

The Standard specifies the general requirements for Customer Equipment (CE) that is designed or intended for use in connection with:

(a) a public mobile telecommunications service (PMTS) and is an addressable device;

(b) a Satellite Service and is an addressable device; or

(c) both of the above.

This Standard does not apply to CE which is not an addressable device such as a GPS terminal or a satellite navigation system.

5.3 INDUSTRY GUIDELINES

5.3.1 Below is a list of ATA industry guidelines related to emergency calling.

G557:2026 Location Information for Emergency Calls

https://www.austelco.org.au/publication/g557/

The guideline describes in multiple parts the processes, procedures and arrangements related to the transfer of location information from Carriers and CSPs to the ECP.

G557.1:2026 General

G557.2:2007 Standardised Mobile Service Area and Location Indicator Register

List of SMSA and ABC Codes 13Dec23

List of Adjoining SMSA Codes 03Jul02

G557.3:2022 Location Independent Communications Service Location Indicator for Emergency Services Signalling;

G557.4:2026 Mobile Location Information (MoLI) Processes for Emergency Calls and Rescue Coordination

G557.5:2025 Push Mobile Location Information (MoLI) Interface To Emergency Call Person Platform (ECPP)

G557.6:2026 Advanced Mobile Location (AML)

G557.7:2023 International Emergency Assistance Call Monitoring Centres

G596:2013 Communication Support for Emergency Response

https://www.austelco.org.au/publication/g596/

The purpose of this Guideline is to provide a standard procedure for the cooperative handling by Carriers and Carriage Service Providers of incidents that require the coordination and communication support of Emergency response.

G663:2020 Telecommunications – Emergency Communications Protocol

https://www.austelco.org.au/publication/g663/

This Guideline was developed to facilitate efficient interactions between the telecommunications industry and relevant Australian Government agencies when events cause major disruptions to telecommunications services.

G644:2020 Emergency Call Service Protections Requirements

For industry use – not publicly available.

The Guideline is designed to supplement the obligations in the Emergency Call Service Requirements Code with information for Carriers and Carriage Service Providers (CSPs).

G675:2025 Network Management for Emergency Calls

https://www.austelco.org.au/publication/g675-2025/

The Guideline is designed to address Recommendation 16 in the Government Response to the Bean Review Final Report and give industry guidance on:

(a) Establishing "the ability to remotely access and activate network management tools … in the event of a core network outage"; and

(b) Having "sufficient network redundancy to deploy" these network management tools "in the event of a core network outage".

5.4 ATA SUBMISSIONS

5.4.1 ATA submissions on past consultations related to emergency communications are available from:

https://www.austelco.org.au/news-and-resources/submissions/

Ends

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