



**BETTER
INTERNET FOR
RURAL,
REGIONAL &
REMOTE AUSTRALIA**

TRIPLE ZERO LEGISLATIVE AND REGULATORY REVIEW

Response to the
Consultation Paper



**PUBLIC ACCESS
TO TRIPLE ZERO**



**INDUSTRY'S DELIVERY
OF, AND ACCESS TO,
TRIPLE ZERO**



**THE LEGISLATIVE
FRAMEWORK'S IMPACT
ON EMERGENCY SERVICES**



**GOVERNMENT
OVERSIGHT
OF TRIPLE ZERO**



SUBMISSION DETAILS



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This submission was prepared in good faith
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About BIRRR

Better Internet for Rural, Regional and Remote Australia (BIRRR) is a national, independent, volunteer-led telecommunications advocacy organisation representing more than 16,500 rural, regional and remote (RRR) Australians. Since 2014, BIRRR has assisted thousands of consumers to navigate telecommunications issues, providing unique insight into the real-world challenges Australians face in accessing reliable, affordable and fit-for-purpose telecommunications services, including during emergencies and natural disasters.

Executive Summary

Reliable access to Triple Zero is a fundamental public safety requirement. For many people living and working in RRR Australia, including many remote First Nations communities, reliable emergency communications cannot be taken for granted. Many routinely work alone, often many kilometres from assistance, with limited network choice, reduced infrastructure redundancy, longer emergency response times and increased reliance on telecommunications during emergencies and natural disasters.

For these Australians, telecommunications are not only the means of contacting Triple Zero, but also the primary means of contacting neighbours, family members or local responders who may be able to provide immediate assistance before emergency services arrive. In many parts of rural and remote Australia there is either no mobile coverage or no alternative mobile network available, meaning a telecommunications outage with one mobile carrier or internet service provider can leave consumers with no practical means of contacting emergency services.

Recent major telecommunications outages, including the 2023 Optus outage and the Telstra outage of 8 July 2026, have reinforced public concerns about the resilience of Australia's emergency communications framework and demonstrated the need for stronger oversight, transparency and accountability. These incidents also significantly undermined public confidence in Australia's emergency communications system. Public confidence in Australia's emergency communications framework depends not only on actual reliability, but also on consumer confidence that Triple Zero will work when needed.

Australia's telecommunications environment is evolving rapidly, with increasing reliance on mobile networks, IP-based voice services, Wi-Fi Calling, satellite-enabled communications and emerging direct-to-device technologies. These technologies present opportunities to improve emergency

communications, but also introduce new risks if implemented without appropriate regulation, consumer protections, evidence-based testing and consumer understanding.

Reliable access to Triple Zero depends not only on resilient networks, but also on consumers understanding how the communications technologies they rely upon perform during emergencies. Improving Connectivity Literacy should therefore be recognised as an essential component of Australia's emergency communications framework.

Consumers should not be expected to learn more, do more or pay more simply to maintain reliable access to Triple Zero. The emergency communications framework should reduce complexity for consumers, not transfer responsibility for resilience onto individuals, particularly those living outside mobile coverage or in areas with limited network choice.

BIRRR supports a legislative and regulatory framework that is technology-neutral but consumer-focused. Innovation should strengthen, not replace, resilient emergency communications and should never result in Australians being left with less reliable access to Triple Zero than they have today.

BIRRR also notes that the recommendation to introduce domestic emergency roaming, first made by the 2021 Regional Telecommunications Independent Review Committee (RTIRC), remains unimplemented. Where alternative mobile networks exist, domestic emergency roaming has the potential to improve access to emergency services during outages and should be progressed as a matter of priority.

Examples of the real-world consumer experiences and issues that have informed BIRRR's recommendations are provided in Appendix A.

In summary, BIRRR recommends that this review:

- ensure no consumer is left worse off in their ability to access Triple Zero through technology transitions;
- recognise Connectivity Literacy as a core component of Australia's emergency communications framework;
- introduce SMS access to Triple Zero;
- require independent, real-world testing of emerging technologies before they are relied upon for emergency communications;
- strengthen proactive oversight, performance reporting and accountability across the emergency communications ecosystem;

- improve transparency through accurate, location-specific outage information and a national telecommunications outage map;
- progress domestic emergency roaming as a matter of priority where alternative mobile networks are available;
- ensure existing telecommunications services and policy amendments supporting access to Triple Zero, are not withdrawn or replaced until equivalent or better emergency communications capability has been independently demonstrated under real-world operating conditions, particularly for consumers in RRR Australia;
- ensure consumers have access to independent, trusted and free telecommunications advice to support informed decision-making;
- design and launch a consumer awareness campaign on access to Triple Zero; and
- embed lived consumer experience, particularly from RRR and First Nations communities, into the ongoing governance of Australia's emergency communications framework.

Ultimately, Australia's emergency communications framework should be judged not by the technologies it adopts, but by whether every Australian can reliably reach Triple Zero when they need it most.

Connectivity Literacy

Consumers should not be expected to become telecommunications experts simply to access Triple Zero. As Australia's telecommunications environment becomes increasingly complex, improving Connectivity Literacy is essential to ensuring Australians can reliably access Triple Zero.

Connectivity Literacy¹ is the awareness, knowledge and confidence required to choose, use and maintain telecommunications services, and to understand how those services perform during emergencies.

Consumers are increasingly expected to understand the capabilities and limitations of technologies such as mobile networks, Wi-Fi Calling, IP-based voice services, satellite communications, backup power arrangements and device compatibility. Many remain unaware that these technologies perform differently during emergencies and may not always provide reliable access to Triple Zero.

¹ Low-Income and Digital Inclusion Forum (LIDIF) Connectivity Literacy Working Group (2026). *Connectivity Literacy Define and Measure Working Group Report (Draft report prepared for the Low-Income and Digital Inclusion Forum)*.

For example, consumers may not realise that:

- Wi-Fi Calling depends on a functioning broadband service and local power;
- direct-to-device satellite services generally require line of sight to the sky and may not work reliably indoors, in vehicles, sheds, dense vegetation or rugged terrain;
- some devices, plans or software versions may not support all emergency communication capabilities; or
- communications services may not operate during extended power outages without appropriate backup arrangements in the home and to telecommunications infrastructure.

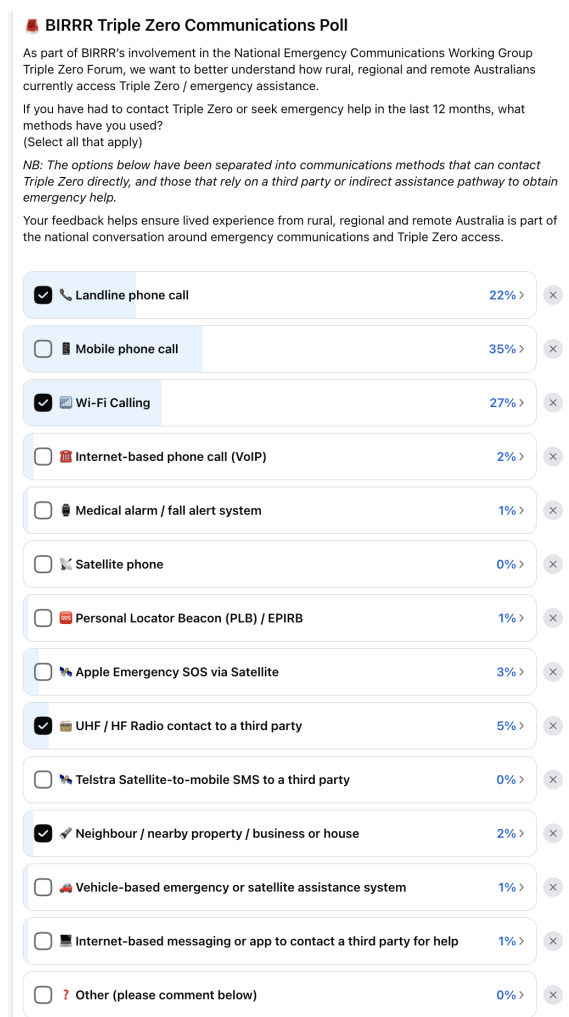
For RRR Australians, including many remote First Nations communities, these knowledge gaps can have life-threatening consequences. Many households rely on layered communications, including mobile, Wi-Fi Calling, fixed broadband, UHF, satellite services and backup power, to provide the redundancy needed during emergencies. Achieving this level of resilience often requires significant technical knowledge and personal financial investment.

Figure 1: BIRRR member survey responses illustrating reliance on layered communications

NB: Survey excluded Public phones/community wi-fi

BIRRR's experience is that the best emergency communications outcomes occur where consumers have resilient and layered communications, understand the capabilities and limitations of those services, have appropriate backup power where required, and can access independent telecommunications advice.

BIRRR believes Connectivity Literacy should be recognised as a core component of Australia's emergency communications framework through clear, consistent and accessible information about how different



technologies access Triple Zero, their capabilities and limitations, and appropriate backup communications options.

However, consumers should not be expected to **learn more, do more or pay more** simply to maintain reliable access to Triple Zero. They should not be required to purchase new devices, specialised equipment or premium services, nor interpret increasingly complex telecommunications technologies or emergency calling arrangements in order to access emergency assistance.

Emergency communications should be simple, predictable and supported by clear, consistent information so Australians can understand how to contact Triple Zero without requiring specialist technical knowledge.

Connectivity Literacy is a shared responsibility. While consumers need clear and accessible information, governments, regulators, carriers, device manufacturers and service providers also have a responsibility to ensure emergency communications are understandable, accessible and fit for purpose. BIRRR recommends the Australian Government, regulators, carriers and emergency service organisations jointly deliver an ongoing national communications safety and Connectivity Literacy campaign to ensure consumers understand how to access Triple Zero using current and emerging communications technologies.

Improving Connectivity Literacy cannot rely solely on information provided by carriers, device manufacturers or commercial service providers. Consumers also need access to independent, trusted and free telecommunications advice. The cessation of Australian Government funding for the Regional Tech Hub has removed Australia's only funded source of independent, free telecommunications consumer support at a time when Australians are being asked to navigate increasingly complex communications technologies and emergency calling arrangements. The Regional Tech Hub played a critical role in helping consumers understand their telecommunications options, troubleshoot connectivity issues and build resilient communications solutions tailored to their individual circumstances.

BIRRR recommends that sustainable funding be restored to the Regional Tech Hub, for independent telecommunications consumer support. Consideration should also be given to reinvesting revenue from telecommunications regulatory penalties and enforcement action into independent consumer education, Connectivity Literacy initiatives and trusted advisory services that directly improve consumer resilience, emergency communications capability and digital inclusion.

As telecommunications technologies continue to evolve, investment in independent consumer education and support should be recognised as an essential component of Australia's emergency communications framework, alongside resilient communications networks, consumer protections and effective regulation.

Technology Transitions Must Not Reduce Access to Triple Zero

Australia is currently experiencing significant telecommunications technology transitions, including the withdrawal of legacy voice services, the transition to IP-based and satellite-enabled communications, the closure of the 3G network and changes to Universal Service Obligation (USO) voice service arrangements.

While these transitions present opportunities to improve communications, they also create a risk that some consumers, particularly those living outside mobile coverage, may be left with less reliable or more complex and expensive pathways to access Triple Zero if appropriate safeguards are not in place.

BIRRR is particularly concerned about the withdrawal of High Capacity Radio Concentrator (HCRC) voice services and recent changes to the Telecommunications Universal Service Obligation (Standard Telephone Service – Requirements and Circumstances) Amendment Determination 2026 (the Amendment).

Historically, HCRC services generally continued to operate during local power outages because customer premises did not require local mains power. Under the amended regulatory framework, some consumers may instead be expected to rely on alternative communications solutions that require customer-provided power, compatible equipment and ongoing maintenance.

BIRRR is concerned that recent amendments to the Telecommunications Universal Service Obligation framework now permit Telstra to refuse to provide a Standard Telephone Service (STS) where a consumer is unable to afford, install or maintain the required customer power arrangements. This has the potential to disproportionately affect vulnerable consumers, older Australians, people living alone, and those living outside mobile coverage. BIRRR considers these changes to have occurred before equivalent consumer safeguards have been established or independently tested, to ensure reliable access to Triple Zero.

Technology transitions should not result in consumers losing proven emergency communications capability before equivalent or better alternatives have been independently demonstrated under real-world operating conditions.

These concerns are explored further through the consumer examples provided in Appendix B.

Responses to Consultation Questions

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?

BIRRR submits that the legislative and regulatory framework should be guided by the principle that access to Triple Zero is an essential public safety obligation, not simply a telecommunications service. The framework should ensure every Australian can reliably access emergency assistance, regardless of where they live, the communications technologies they use, or the circumstances in which an emergency occurs.

For RRR Australians, dependable access to Triple Zero relies on more than network availability. It also depends on resilient supporting infrastructure, including backup power, compatible devices, appropriate backup communications options and informed consumers. These factors should be recognised throughout the legislative and regulatory framework.

BIRRR recommends the framework be guided by the following principles:

Universal and equitable access: Every Australian should have reliable access to Triple Zero regardless of where they live, work or travel. Consumers should not be disadvantaged because of geography, technology transition or commercial decisions. This includes ensuring culturally appropriate and equitable access for remote First Nations communities that often experience limited telecommunications choice and infrastructure resilience.

Reliability and redundancy: Carriers and service providers should design, maintain and regularly test networks with emergency access in mind, including during outages, power failures, natural disasters and technology transitions. Minimum service standards should apply to communications services that underpin access to Triple Zero, particularly mobile networks, recognising their role as essential public

infrastructure. This should include resilience requirements for supporting infrastructure, including appropriate backup power.

Technology neutrality: New technologies, including satellite-enabled communications, Wi-Fi Calling, direct-to-device services, wearables and IP-based voice services, should be supported where they demonstrably improve emergency access and meet appropriate standards for reliability, resilience, interoperability and consumer safety.

Consumer clarity: Consumers should have access to clear, accurate and consistent information about how they can access Triple Zero, the capabilities and limitations of the technologies they rely upon, and any backup communications options available.

Shared accountability: Regulation should recognise the shared responsibilities of carriers, Carriage Service Providers (CSPs), device manufacturers, software providers, Emergency Call Persons (ECPs) and government in maintaining reliable emergency communications.

Proactive oversight: The framework should require ongoing testing, performance reporting, post-incident reviews and continuous improvement, rather than relying on failures or consumer complaints to identify systemic issues.

No consumer left worse off: As legacy services are replaced and new technologies introduced, consumers must not lose reliable access to Triple Zero without equivalent or better alternatives being available.

These principles should be reflected through enforceable minimum standards, proactive regulatory oversight, mandatory performance reporting and explicit recognition of the unique communications challenges faced by RRR Australia. Together, these principles will help ensure Australia's emergency communications framework remains resilient, trusted and fit for purpose as telecommunications technologies continue to evolve.

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?

BIRRR considers the current legislative and regulatory framework does not adequately reflect Australia's rapidly evolving telecommunications environment or the increasing reliance on emerging communications technologies to access emergency services.

Following the 3G shutdown, BIRRR has observed increasing instances where consumers appear to have mobile coverage, with their device displaying signal, but are unable to place or sustain a reliable voice call. This creates significant uncertainty about whether Triple Zero can be reached and highlights the need for the regulatory framework to recognise usable, reliable emergency communications, rather than nominal coverage alone.

One of the most significant limitations is the continued inability for Australians to contact Triple Zero via SMS. This is increasingly inconsistent with contemporary communication practices and creates particular challenges during disasters, network congestion, power outages, accessibility situations and in areas of intermittent coverage where an SMS may be transmitted when a voice call cannot.

The framework should better accommodate emerging technologies, including satellite-enabled communications, Wi-Fi Calling, IP-based voice services, wearable devices and future emergency communications technologies, while ensuring they meet appropriate standards for reliability, resilience, interoperability and consumer safety.

BIRRR also considers that the role of domestic roaming in supporting resilient emergency communications, particularly in RRR Australia, should be reconsidered as part of Australia's broader emergency communications framework. Previous consideration of domestic roaming has largely focused on competition outcomes. This review provides an opportunity to also consider the public safety benefits that domestic roaming may deliver by improving access to Triple Zero during network outages of one carrier.

To increase flexibility, the legislative and regulatory framework should:

- enable SMS access to Triple Zero, supported by appropriate safeguards;
- establish clear standards and responsibilities for satellite-enabled emergency communications;
- clarify obligations relating to Wi-Fi Calling and IP-based emergency calling;

- require interoperability between networks and technologies during emergencies;
- require emerging technologies to be independently tested under real-world regional conditions, rather than metropolitan assumptions, before they are relied upon for emergency communications;
- support innovation while maintaining strong consumer protections; and
- support Connectivity Literacy by ensuring consumers understand which technologies can access Triple Zero, how those technologies perform during emergencies and any associated limitations.

Importantly, new technologies should complement, not replace, resilient terrestrial mobile and broadband infrastructure and dedicated voice services for consumers outside mobile coverage areas. No single technology should be relied upon as the sole means of accessing Triple Zero. For example, direct-to-device satellite services require line of sight to the sky and may not provide reliable emergency communications in homes, vehicles, sheds, dense vegetation, rugged terrain or other real-world regional environments. Likewise, domestic roaming should not be viewed as a substitute for improved mobile coverage or resilient telecommunications infrastructure.

The legislative and regulatory framework should support innovation while ensuring that new technologies enhance, rather than diminish, equitable and reliable access to Triple Zero.

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

BIRRR supports multi-modal access to Triple Zero where it enhances emergency access, particularly for people living in RRR Australia and during natural disasters, network disruptions or other emergency situations.

However, multi-modal access must complement, not replace, reliable and resilient emergency communications. The primary objective of the legislative and regulatory framework should remain dependable access to Triple Zero, with all emergency communication methods meeting minimum standards for reliability, resilience, interoperability, location capability and consumer safety.

The framework should recognise that nominal network coverage does not necessarily equate to usable emergency communications. Consumers require communications services that are capable of reliably supporting emergency calls, rather than simply displaying a mobile signal.

New contact methods, including SMS, satellite-enabled communications and future technologies, should be treated as additional pathways to access Triple Zero rather than substitutes for resilient terrestrial networks, dedicated voice services or appropriate backup power arrangements. Access to Triple Zero should not depend on a single communications pathway or technology. Instead, the framework should support layered and complementary communications that provide multiple independent pathways capable of maintaining access when one technology, network or communications service fails.

The regulatory framework should also encourage the development and evaluation of multiple independent emergency communications pathways, recognising that voice, data and emerging communications technologies may each provide different levels of resilience during network failures. BIRRR supports independent testing of emerging data-based emergency communications pathways, including Voice over Internet Protocol (VoIP), direct-to-device satellite data services and other technologies that may improve resilience and redundancy where traditional voice services are unavailable or no longer in place.

The framework should prioritise reliability and redundancy while enabling innovation. All emergency access technologies should be independently tested under real-world conditions before they are relied upon for emergency communications, supported by appropriate consumer protections and accompanied by clear, consistent information that enables Australians to understand their capabilities, limitations and any backup communications options that may be required.

BIRRR supports continued investigation of international approaches that improve the resilience of emergency communications and reduce reliance on a single communications pathway, particularly where they demonstrate improved public safety outcomes. International approaches to improving emergency communications resilience, including arrangements adopted in countries such as Finland, should be considered as part of Australia's longer-term emergency communications strategy.

The appropriate mix of technologies may differ between metropolitan, regional and remote Australia, but every Australian should have an equivalent ability to contact Triple Zero when they need it most.

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?

BIRRR supports a legislative and regulatory framework that enables the Australian Communications and Media Authority (ACMA) to establish evidence-based technical requirements for devices and technologies that can access Triple Zero, supported by transparent consultation and regular review.

As communications technologies continue to evolve, the framework must be sufficiently flexible to respond without requiring legislative amendment for every new technology. Decisions should be based on independent assessment against minimum standards for reliability, resilience, interoperability, location capability, security and consumer safety, rather than the type of technology itself.

BIRRR does not support excluding technologies simply because they are new. Emerging technologies should be permitted where they demonstrably improve emergency access and meet the required performance standards. Equally, new technologies should be independently tested and, where appropriate, trialled under real-world conditions, including in RRR environments, before being approved for Triple Zero access. Technologies should not be approved where they present unacceptable risks or cannot consistently provide reliable access to emergency services.

The framework should also ensure that approved technologies are accompanied by clear consumer information about their capabilities, limitations and any conditions that may affect access to Triple Zero. This is particularly important where consumers rely on a single communications service or may reasonably assume a technology provides emergency access when it does not.

Ultimately, decisions about eligible technologies should remain independent, evidence-based and focused on protecting the integrity of the Triple Zero system while supporting innovation that delivers genuine public benefit.

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?

As mobile devices have become increasingly software-driven, device manufacturers play a critical role in ensuring consumers can reliably access Triple Zero. The legislative and regulatory framework should

recognise that responsibility is shared across carriers, operating system providers, device manufacturers and suppliers.

While many device manufacturers are global entities, Australia can establish minimum emergency communications requirements for devices supplied to the Australian market. Consumers should be able to expect that any device sold in Australia supports Australian emergency calling arrangements and continues to do so throughout its supported lifecycle.

BIRRR supports introducing minimum requirements for mobile devices supplied in Australia to ensure they can reliably access Triple Zero across Australian networks and approved emergency communication technologies.

These requirements should include:

- compliance with Australian emergency calling standards before devices are supplied to the Australian market;
- testing across Australian mobile networks and approved emergency communications technologies;
- compatibility with Australian emergency calling arrangements, including future technologies such as SMS to Triple Zero and approved satellite-enabled emergency communications;
- software and security updates that do not compromise emergency calling functionality;
- clear, accessible information about any device or software limitations that may affect emergency access; and
- obligations for manufacturers, suppliers and carriers to work collaboratively with regulators to promptly investigate and rectify issues affecting Triple Zero access.

Given the increasing reliance on smartphones as many consumers' primary communications device, manufacturers should have ongoing obligations to support reliable emergency communications throughout the supported lifecycle of the device, not just at the point of sale. These obligations should complement, rather than replace, those applying to CSPs.

Where devices no longer support Australian emergency calling requirements due to software changes, network evolution or technology transitions, consumers should be clearly informed and supported to minimise any impact on their ability to access Triple Zero.

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?

BIRRR submits that carriers, CSPs and ECPs should be accountable not only for carrying emergency calls, but for ensuring Australians can reliably access Triple Zero before, during and after network changes, outages and emergencies.

The regulatory framework should recognise that emergency call failures can occur even where a device appears connected to a mobile network. Emergency access should therefore be tested under a range of real-world failure scenarios, including partial network failures where a device remains attached to its home network but emergency calls cannot be completed.

The desired outcomes should include:

- reliable and timely access to Triple Zero regardless of technology;
- resilient emergency communications during outages, natural disasters and power failures;
- accurate transfer of caller and location information where technically feasible;
- proactive identification and mitigation of risks before consumers are affected;
- timely communication where emergency access may be impacted; and
- continuous monitoring and improvement of emergency service performance.

To achieve these outcomes, the framework should require:

- mandatory risk assessments and independent testing before significant network or technology changes;
- minimum resilience and redundancy standards, particularly for RRR networks;
- notification to regulators and affected consumers where emergency access may be impacted;
- transparent reporting of Triple Zero failures, outages and near misses;
- clear accountability across the emergency communications ecosystem, including carriers, CSPs, device manufacturers and other technology providers; and
- regular review of emerging technologies against defined emergency service performance standards.

For RRR Australia, the framework should place greater emphasis on preventing failures than responding to them after harm occurs. Consumers should never first learn that emergency communications have failed when they attempt to contact Triple Zero.

Question 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?

BIRRR supports stronger proactive obligations to identify, report and rectify systemic issues before they affect consumers' ability to access Triple Zero.

The framework should require carriers, CSPs and ECPs to undertake regular risk assessments, network testing and scenario planning, including for RRR areas where limited network redundancy increases the consequences of failure. Emergency communications should be designed to fail safely. Where one emergency communications pathway becomes unavailable due to network failure, consumers should automatically be able to access alternative pathways wherever technically feasible, without requiring additional technical knowledge or consumer intervention.

The most effective mechanisms include:

- mandatory reporting of Triple Zero failures, near misses and systemic risks;
- independent audits of emergency communications performance and resilience;
- mandatory improvement plans with clear actions, responsibilities and implementation timeframes;
- enforceable directions from the ACMA where risks are not adequately addressed;
- post-incident reviews that identify root causes, consumer impacts and lessons learned;
- monitoring and public reporting on the implementation of recommendations arising from significant incidents; and
- public reporting of aggregated trends, systemic issues and corrective actions.

The ACMA should also be empowered to identify and investigate systemic issues across multiple carriers, technologies and incidents, rather than assessing events in isolation. A series of seemingly minor failures, recurring outages or related consumer complaints may collectively indicate broader weaknesses that warrant regulatory intervention before they compromise access to Triple Zero.

The framework should require carriers to provide accurate, location-specific information to consumers and regional stakeholders during network outages. BIRRR has observed instances where outage notifications advised consumers that Triple Zero calls would automatically roam to another mobile network, despite there being no alternative mobile coverage in the affected area. Generic or standardised outage messaging that does not reflect actual network availability creates a false sense of

security and may place consumers at significant risk. Regulatory obligations should require emergency communications advice to be verified against local network conditions before it is distributed.

BIRRR also supports the development of a nationally consistent telecommunications outage reporting framework, including a national real-time outage map, to improve situational awareness for consumers, emergency service organisations, regulators and governments during significant telecommunications disruptions.

Ultimately, the framework should shift from responding to incidents after they occur to proactively identifying, investigating and addressing systemic risks before they compromise Australians' ability to access Triple Zero.

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?

BIRRR supports enhanced and ongoing performance reporting to improve transparency, accountability and public confidence in the delivery of Triple Zero services.

Current reporting is largely focused on the ECP and does not provide sufficient visibility of carrier and CSP performance or the impacts of network outages and technology changes on consumers.

At a minimum, reporting should include:

- Triple Zero call completion rates by network and technology type;
- the number and causes of failed or unsuccessful emergency call attempts;
- the percentage of Triple Zero calls successfully connected on the first attempt;
- reported call connection delays, failed call attempts and "call hang" events affecting access to Triple Zero;
- significant outages affecting Triple Zero access, including affected geographic areas, duration and restoration times;
- network changes that may impact emergency calling and the outcomes of associated testing;
- identified systemic issues, corrective actions and implementation timeframes;
- the availability of usable emergency communications, rather than reported network coverage alone;

- the accuracy and timeliness of consumer information provided during outages that may affect access to Triple Zero;
- the number of welfare checks initiated following unsuccessful or interrupted emergency calls;
- de-identified data on the technologies used to access Triple Zero (for example, mobile networks, fixed-line services, Wi-Fi Calling, satellite-enabled communications and future emergency communication technologies); and
- consumer complaints and enquiries relating to emergency service access.

Where technically feasible and with appropriate privacy safeguards, carriers should collect and report de-identified information on both the technologies used to access Triple Zero and the communications pathways associated with failed, delayed or interrupted emergency call attempts. Where possible, this information should distinguish between metropolitan, regional, rural and remote Australia as separate reporting categories, rather than aggregating RRR Australia into a single cohort. National averages can mask significant differences in service reliability, resilience and emergency communications capability, reducing the visibility of issues affecting rural and remote communities. This would provide a more accurate understanding of how Australians access emergency services, identify where particular technologies or regions experience greater challenges, and inform future regulatory settings, technology investment, Connectivity Literacy initiatives, and redundancy and resilience planning.

Reporting should occur quarterly, with significant incidents affecting Triple Zero access reported to the ACMA and Triple Zero Custodian as required. An annual public report should identify sector-wide trends, recurring issues, improvements and emerging risks.

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?

BIRRR supports greater information sharing between carriers, CSPs, ECPs, emergency service organisations, regulators and government agencies to strengthen Australia's emergency communications framework.

Information sharing should extend beyond incident response to include the proactive identification of emerging risks, coordinated planning for network and technology changes, and continuous improvement of Australia's emergency communications capability.

Information that should be routinely shared, where appropriate, includes:

- planned network and technology changes that may affect access to Triple Zero;
- significant outages, near misses and emerging systemic risks;
- lessons learned from major incidents and post-incident reviews;
- emergency communications performance data and trends;
- compatibility issues affecting devices, software or emerging technologies;
- regional network resilience issues, including areas with limited or no alternative communications options;
- accurate, location-specific outage information and emergency communications advice for emergency service organisations, local governments and trusted regional stakeholders; and
- information on communications capability during outages, including whether alternative mobile networks, Wi-Fi Calling or other emergency communications options remain available.

Governance arrangements should establish clear responsibilities, common reporting standards, defined notification timeframes and appropriate protections for commercially sensitive and security-related information. They should also include mechanisms to monitor the implementation of recommendations arising from significant incidents and systemic reviews.

BIRRR also supports establishing a formal cross-sector forum involving regulators, industry, emergency service organisations and consumer representatives to review emerging risks, technology changes and systemic issues. Consumer representatives should be ongoing participants to ensure lived experience, including that of RRR and First Nations communities, informs future policy, operational decisions and continuous improvement.

Effective information sharing will strengthen preparedness, improve coordination and support more informed decision-making before, during and after incidents affecting access to Triple Zero.

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?

BIRRR supports the continued operation of a single national Triple Zero system. A nationally consistent emergency access point provides clarity and certainty for consumers, particularly during emergencies, natural disasters and when travelling between jurisdictions.

However, a single national emergency call system should not prevent state and territory emergency service organisations from adopting new technologies or improving dispatch capabilities where these enhancements maintain interoperability, reliability and equitable access to emergency services.

The legislative framework should support innovation in areas such as enhanced location information, multimedia communications, SMS, real-time text, translation services and other emerging technologies, provided they integrate seamlessly with the national Triple Zero system and meet consistent national standards for performance, security and consumer safety.

Innovation should be supported through a nationally coordinated framework that avoids fragmented approaches while allowing jurisdictions to trial, evaluate and implement improvements that demonstrably enhance emergency outcomes. Successful innovations should be capable of being adopted nationally where they improve emergency communications.

For RRR Australia, innovation should improve accessibility, resilience and reliability without creating different emergency access experiences based on location. Australians should continue to have a simple, trusted and consistent pathway to request emergency assistance, regardless of where they live, the technology they use or the jurisdiction in which they are located.

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?

BIRRR considers there is additional information that should be made available to emergency service organisations, where appropriate and with suitable privacy and security protections, to support emergency response and public safety.

This should include:

- real-time information on telecommunications outages, degraded services and network capability affecting emergency communications;
- planned network and technology changes that may impact access to Triple Zero;
- network resilience information, including power outages, backup power limitations and expected restoration timeframes affecting telecommunications infrastructure;
- identification of areas with no alternative mobile coverage, so emergency service organisations understand where consumers cannot rely on roaming or backup mobile networks;

- known technology limitations affecting emergency communications; and
- post-incident findings and de-identified trends relating to emergency call delivery.

Emergency service organisations should also receive accurate, location-specific information about telecommunications capability during significant outages. BIRRR has observed instances where emergency stakeholders were advised that Triple Zero calls could roam to another network despite there being no alternative mobile coverage available in the affected area. Operational decisions should be informed by actual network capability, including known coverage limitations, degraded services and the availability, or absence, of alternative communications pathways, rather than generic assumptions.

BIRRR also recommends the development of a nationally consistent telecommunications outage map that provides authorised emergency service organisations, local governments, local disaster management groups, regulators and other trusted stakeholders with timely, accurate and location-specific information during major telecommunications outages. In many rural and remote areas, local government areas and emergency management districts cover vast geographic regions, making it difficult to obtain a complete picture of outages when information is provided through multiple ad hoc sources or individual carrier notifications. Where appropriate, information provided by carriers, CSPs and ECPs should feed into nationally consistent telecommunications outage reporting to improve situational awareness for relevant stakeholders and consumers. A national map would support emergency planning and response, improve coordination during incidents, and enable more informed operational and community communications decisions.

Information sharing arrangements should also recognise the needs of remote First Nations and discrete communities, where prolonged telecommunications outages can affect entire communities and significantly limit access to emergency services.

Providing timely, accurate and consistent information will strengthen situational awareness, improve operational decision-making and support more effective emergency responses, particularly in RRR Australia.

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?

BIRRR supports strengthening the ACMA's powers to enable a more proactive, risk-based approach to regulating Triple Zero as communications technologies continue to evolve.

The ACMA should have powers to:

- require carriers, CSPs and other relevant parties to undertake risk assessments, and test Triple Zero functionality before and following significant network, software or technology changes;
- direct independent testing and audits where there is evidence of systemic risk or emerging issues;
- require mandatory improvement plans where deficiencies are identified;
- collect, analyse and publish meaningful performance and outage data relating to emergency communications, including where access to Triple Zero has been affected or unavailable. Reporting should not be limited to national or aggregated RRR data, but should distinguish between metropolitan, regional, rural and remote Australia as separate reporting categories, together with First Nations communities where appropriate, to ensure areas experiencing disproportionate impacts are visible;
- set and update minimum technical standards for new technologies and devices accessing Triple Zero;
- require carriers to provide accurate, location-specific consumer information where network outages or changes may affect emergency communications;
- require carriers to provide information reasonably requested by the ACMA to support investigations into systemic issues affecting emergency communications;
- require carriers to provide standardised, real-time outage and restoration information to support a national telecommunications outage map, improving transparency and situational awareness for consumers, emergency service organisations, local governments and regulators; and
- require post-incident reviews, monitor implementation of recommendations and ensure lessons learned are acted upon following significant failures.

BIRRR also considers the ACMA should have stronger oversight of technology transitions that may affect emergency access, including changes to mobile networks, IP-based voice services and emerging satellite technologies. This should include the ability to require independent

testing and, where necessary, delay implementation until there is sufficient evidence that reliable access to Triple Zero will be maintained.

Ultimately, the ACMA's role should extend beyond monitoring technical compliance to proactively identifying and managing systemic risks, strengthening consumer protection, and ensuring Australians continue to have reliable, resilient and well-understood access to Triple Zero as telecommunications technologies evolve.

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?

BIRRR considers the current framework remains largely reactive, placing too much emphasis on responding to individual incidents and technical compliance, rather than proactively identifying patterns that indicate broader systemic risks before they affect consumers' access to Triple Zero.

The ACMA should be explicitly empowered to assess related incidents collectively, even where individual events may not, in isolation, constitute a significant regulatory breach. A series of recurring outages, consumer complaints, compatibility issues or reporting failures may collectively indicate systemic weaknesses that warrant regulatory intervention. This should include the ability to link related issues across different technologies, providers and geographic regions, rather than assessing each incident in isolation.

BIRRR has experienced this firsthand through its reporting of issues affecting Telstra small cells using OneWeb backhaul, where consumers experienced repeated difficulties making and receiving voice calls, including at least one reported failure to access Triple Zero. Despite the matter being raised with Telstra, the ACMA, the Australian Competition and Consumer Commission (ACCC), the Department and the Minister's Office over an extended period, BIRRR has not received clear advice as to whether the underlying systemic issues have been fully resolved or what measures were implemented to ensure consumers could continue to reliably access emergency services. This demonstrates the need for a regulatory framework that proactively investigates, coordinates and closes out systemic issues, rather than relying on individual complaints or assuming problems have been resolved.

To support this approach, the framework should enable the ACMA to:

- identify and investigate recurring issues across multiple carriers, CSPs, technologies and geographic regions;
- use consumer complaints, outage data, incident reports and performance reporting to identify emerging systemic risks;
- require corrective action where repeated issues demonstrate broader failures in governance, systems or risk management, even if no single incident is considered sufficiently serious on its own; and
- publish de-identified findings, recommendations and lessons learned from systemic investigations to improve industry performance and transparency.

The ACMA should also be empowered to proactively investigate systemic risks arising from major technology transitions, network changes and emerging communications technologies, rather than waiting until emergency communications failures occur.

A proactive, intelligence-led regulatory approach will strengthen consumer confidence, improve accountability and support the ongoing reliability and resilience of Australia's Triple Zero system.

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?

BIRRR supports the intent of clarifying the respective roles of the ACMA and the Triple Zero Custodian. However, it is too early to determine whether the recent changes will deliver improved outcomes in practice.

Regardless of the governance model, there must be clear accountability for identifying, coordinating and addressing systemic risks across the Triple Zero ecosystem. Responsibilities should not become fragmented or create uncertainty about which organisation is responsible for responding to emerging issues, coordinating corrective action or monitoring implementation.

BIRRR considers the ACMA should remain the independent regulator responsible for compliance, enforcement and consumer protection, while the Triple Zero Custodian should provide strategic oversight, cross-sector coordination and continuous improvement across the emergency communications ecosystem.

Strong governance arrangements should include:

- clearly defined roles, responsibilities and accountability;
- regular information sharing between the ACMA, the Custodian, industry and emergency service organisations, supported by clear accountability for coordinating, responding to and resolving identified systemic issues;
- transparent public reporting with consistent messaging, on systemic risks, incidents, recommendations and actions taken;
- mechanisms to ensure recommendations arising from reviews and post-incident investigations are implemented, monitored and publicly reported, so stakeholders can understand what actions have been taken and whether identified risks have been resolved;
- formal, ongoing and embedded engagement with consumer representatives, particularly those representing RRR and First Nations communities, so that lived experience routinely informs policy, operational improvements and future regulatory decisions; and
- regular review of emerging technologies and technology transitions to ensure governance arrangements remain fit for purpose.

Ultimately, the effectiveness of the governance framework should be measured not by organisational structure, but by whether systemic risks are identified early, acted upon transparently, resolved effectively, and communicated back to stakeholders. Governance should provide confidence that emerging risks are not only identified, but managed and closed out before they compromise Australians' ability to access Triple Zero.

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

BIRRR is not in a position to determine whether the Triple Zero Custodian requires additional statutory powers. However, if the Custodian is expected to provide strategic oversight of Australia's emergency communications framework, it must have sufficient authority to identify, coordinate, monitor and respond to systemic risks across the Triple Zero ecosystem.

At a minimum, the Custodian should be able to:

- obtain timely information from carriers, CSPs, ECPs and other relevant entities where necessary to assess systemic risks;
- coordinate cross-sector responses to emerging issues affecting emergency communications;

- monitor and publicly report on the implementation of recommendations arising from major incidents and post-incident reviews;
- identify emerging risks associated with new technologies, network changes and technology transitions; and
- engage with consumer representatives, industry, regulators and emergency service organisations to ensure policy and operational decisions are informed by lived experience. This should include organisations representing rural, regional, remote and First Nations communities, whose experiences often differ significantly from metropolitan assumptions underpinning telecommunications policy.

The Custodian should also have visibility of telecommunications outages, technology transitions, emerging risks and systemic trends that may affect emergency access, particularly in RRR Australia where limited network redundancy increases the consequences of service failures.

Consumer representative organisations should be recognised as an ongoing source of operational intelligence, not only consulted after major incidents or during formal reviews. BIRRR believes there is no substitute for lived consumer experience. Technical compliance and performance reporting alone do not always reflect the realities faced by Australians who rely on telecommunications to access emergency services.

Recent consultation processes have demonstrated that there can be a disconnect between the lived experiences of RRR consumers and final policy outcomes. BIRRR remains concerned that issues consistently raised during the recent consultation on Universal Service Obligation voice services were not meaningfully reflected in the final regulatory outcome, with the potential to leave some vulnerable and low-income consumers worse off through reduced access to reliable voice services and, consequently, dependable access to Triple Zero.

Regardless of whether additional statutory powers are ultimately required, the governance framework should include formal mechanisms for ongoing and embedded engagement with consumer representatives, together with greater transparency about how consumer feedback informs decision-making and what actions are taken in response. Embedding lived experience within the Custodian's oversight role will strengthen the continuous improvement, accountability and public confidence in Australia's emergency communications framework.

Effective governance is not measured solely by the powers conferred on institutions, but by whether those institutions identify risks early, act transparently, engage meaningfully with consumers and deliver measurable improvements to Australians' ability to access Triple Zero.

Conclusion

BIRRR recommends that the guiding principle of this review should be that every Australian, regardless of where they live, has equitable, reliable and clearly understood access to Triple Zero.

As Australia's telecommunications environment continues to evolve, the legislative and regulatory framework must remain technology-neutral but consumer-focused, ensuring innovation strengthens—rather than weakens—emergency communications. This requires proactive regulation, clear accountability, transparency and recognition that the needs of RRR Australians, including remote First Nations communities, must be considered from the outset, not as an afterthought.

Achieving this will require resilient communications networks, appropriate redundancy, improved Connectivity Literacy, evidence-based regulation and ongoing engagement with the people and communities who rely on these services every day. It will also require continued investment in independent consumer support services, accurate and transparent outage information, and regulatory settings that ensure no Australian is left worse off as telecommunications technologies evolve.

Ultimately, Australia's emergency communications framework should be judged not by the technologies it adopts, but by whether every Australian can reliably reach Triple Zero when they need it most. Success will be achieved when every Australian can confidently and reliably access Triple Zero regardless of their location, available communications technology, power availability or level of technical knowledge, without needing to overcome unnecessary technical complexity or significant personal financial investment simply to remain safe.

Appendix A – Examples of Consumer Experience and Emerging Issues in RRR Emergency Communications

This appendix provides examples drawn from BIRRR's consumer advocacy, member engagement and participation in the National Emergency Communications Working Group Triple Zero Forum. The examples illustrate how the issues identified throughout this submission affect Australians in real-world emergency situations.

1. Emergency communications increasingly rely on layered connectivity

BIRRR's experience is that reliable emergency communications in rural and remote Australia are rarely dependent on a single technology. Consumers increasingly rely on layered communications solutions, including combinations of:

- mobile services;
- landline or IP voice services;
- Wi-Fi Calling;
- satellite communications;
- UHF and HF radio;
- Personal Locator Beacons (PLBs) and EPIRBs;
- internet messaging applications;
- vehicle-based emergency systems; and
- backup power systems.

Many households invest significant time, technical knowledge and personal financial resources to build communications resilience because a single communications service cannot always be relied upon during emergencies.

However, maintaining multiple communications services, compatible devices, backup power systems and alternative technologies comes at a significant financial cost. For many RRR households—particularly those experiencing financial hardship—this level of redundancy is simply not achievable.

BIRRR notes that recent changes to the Telecommunications Universal Service Obligation (Standard Telephone Service – Requirements and Circumstances) Amendment Determination 2026 may further increase this risk by making it more difficult for some vulnerable consumers to access a dedicated voice

service. For consumers living outside mobile coverage, or in areas with limited network resilience, layered communications solutions are often necessary to maintain reliable access to Triple Zero. Where policy settings increasingly rely on consumers combining multiple communications services and technologies instead of providing access to a dedicated voice service, the associated costs, technical complexity and ongoing maintenance must be recognised.

These policy settings and amendments risk transferring the cost and complexity of maintaining reliable emergency communications onto consumers simply to maintain dependable access to essential communications and Triple Zero. The cumulative cost of multiple communications services, backup power and compatible devices has the potential to create inequitable emergency communications outcomes, particularly for vulnerable consumers, older Australians and people living in RRR areas.

BIRRR's submission² to the Telecommunications Universal Service Obligation (Standard Telephone Service – Requirements and Circumstances) Amendment Determination 2026 provides further detail on these concerns.

2. Case Study – Wi-Fi Calling enabled access to Triple Zero following the 3G shutdown

In February 2026, BIRRR Co-Founder Kristy Sparrow's husband sustained a serious injury after breaking his femur in cattle yards approximately three kilometres from their homestead.

Following the 3G shutdown, mobile voice services at the property had degraded to the point where they could no longer be relied upon for voice calls, despite intermittent mobile signal still being available.

During the emergency call there was a delay of approximately 30 seconds where the call appeared to "hang" before connecting, creating uncertainty during a time-critical situation.

The property had previously installed a solar-powered point-to-point Wi-Fi system linking the cattle yards to an NBN Sky Muster service located at a nearby workers' cottage. This allowed ongoing communication with emergency services from the accident site while first aid was being administered.

This experience demonstrates that reliable access to Triple Zero increasingly depends on a combination of:

2

<https://birrraus.com/wp-content/uploads/2026/07/birrr-response-telecommunications-universal-service-obligation-standard-telephone-service-requirements-and-circumstances-amendment-determination-2026-1.pdf>

- multiple communications pathways;
- resilient broadband services;
- backup power;
- consumer awareness of available technologies; and
- understanding how and when those technologies can be used.

Without these layered communications arrangements, access to emergency assistance would have been significantly more difficult.

3. Common issues reported by RRR consumers

Through direct consumer assistance, member engagement and advocacy activities, BIRRR regularly receives reports of:

- declining mobile voice reliability following the 3G shutdown;
- devices displaying mobile signal while being unable to place or maintain reliable voice calls;
- prolonged delays ("call hangs") before emergency calls connect;
- call dropouts during emergency communications;
- telecommunications outages caused by power failures;
- loss of reliable voice services following migration from legacy telecommunications technologies;
- uncertainty about whether Triple Zero can be accessed during telecommunications outages or technology transitions;
- reduced resilience resulting from increasing reliance on customer-powered technologies;
- uncertainty regarding Wi-Fi Calling, satellite communications and backup communications pathways; and
- limited awareness of alternative emergency communications options.

These experiences demonstrate that nominal network coverage does not necessarily equate to usable emergency communications or reliable access to Triple Zero.

4. Consumer misconceptions

BIRRR regularly encounters misunderstandings about emergency communications, including assumptions that:

- mobile phones automatically connect to satellites when mobile coverage is unavailable;
- Triple Zero calls will always roam to another mobile network during outages;
- 112 is a satellite emergency number;
- SMS to Triple Zero is already available in Australia;
- emergency applications operate without connectivity;
- satellite emergency messaging functions on all devices;
- new communications technologies always provide an equivalent level of emergency access to the services they replace;
- backup power is only required for internet services, rather than for many modern voice communications technologies; and
- mobile signal bars always indicate that reliable emergency calling is available.

These misconceptions reinforce the need for improved Connectivity Literacy and nationally consistent public education regarding emergency communications technologies and their limitations.

5. The importance of independent consumer support

As telecommunications technologies become increasingly complex, consumers require access to independent, trusted information to understand:

- which communications technologies they can rely upon;
- how different technologies access Triple Zero;
- the limitations of those technologies;
- backup communications options;
- how technology transitions may affect their ability to access Triple Zero; and
- how to build resilient communications arrangements appropriate to their circumstances.

BIRRR is concerned that the cessation of Australian Government funding for the Regional Tech Hub has removed Australia's only nationally funded source of independent, free telecommunications consumer support at a time when consumers are being expected to navigate increasingly complex communications technologies and emergency calling arrangements.

Key observations

BIRRR's experience demonstrates that reliable access to Triple Zero in RRR Australia depends on far more than mobile coverage alone. It requires a combination of:

- resilient and layered communications infrastructure;
- reliable voice services;
- backup power where required;
- independent, evidence-based consumer advice;
- clear and consistent consumer information;
- technologies that have been independently tested under real-world operating conditions; and
- consumers understanding the capabilities and limitations of the communications technologies they rely upon.

Consumers should not bear the cost and complexity of maintaining resilient emergency communications simply to access Triple Zero. As telecommunications technologies continue to evolve, regulatory frameworks should reduce complexity for consumers, not transfer responsibility for building resilient emergency communications onto individuals.

These observations reinforce the recommendations contained throughout this submission for improved Connectivity Literacy, stronger consumer protections, evidence-based technology transitions, enhanced regulatory oversight and continued investment in resilient emergency communications.

Appendix B – Case Studies: Technology Transitions and Access to Triple Zero

The following examples illustrate how current telecommunications technology transitions have the potential to affect reliable access to Triple Zero for consumers living in RRR Australia. They demonstrate the importance of ensuring existing communications services are not withdrawn until equivalent or better emergency communications capability has been demonstrated under real-world operating conditions.

Case Study 1 – Transition from High Capacity Radio Concentrator (HCRC) Services

An elderly consumer living alone on a rural property with no access to mains electricity previously relied on a HCRC voice service, which continued to operate during local power outages.

Under current policy settings, this consumer may instead be expected to rely on a satellite-enabled voice service requiring customer-supplied power, backup equipment and ongoing maintenance. During an emergency, this could require the consumer to start a generator or other backup power source, power the communications equipment and wait for the satellite voice service to initialise before contacting Triple Zero.

If the consumer were injured, physically unable to undertake these tasks, or the backup power system failed, reliable access to emergency services could be significantly delayed or lost altogether. This represents a materially reduced emergency communications capability outcome compared with the previous HCRC service.

This example highlights the importance of ensuring that technology transitions do not reduce practical access to Triple Zero, particularly for vulnerable consumers living outside mobile coverage.

Case Study 2 – Satellite Communications During Prolonged Monsoonal Weather

A family living in remote Northern Territory relied on satellite communications as their primary means of voice communication after the withdrawal of their HCRC service. During prolonged monsoonal rainfall, they experienced an extended loss of satellite connectivity and were unable to make voice calls for several hours.

With no mobile coverage and no alternative telecommunications service available, the household was left without a reliable means of contacting emergency services during this period.

While satellite-enabled communications have an important role in improving connectivity across regional and remote Australia, this example demonstrates that they remain vulnerable to environmental conditions and should not automatically be regarded as equivalent replacements for resilient terrestrial or legacy voice services without appropriate redundancy, consumer safeguards and independent real-world testing.

These examples reinforce BIRRR's recommendation that existing communications services supporting access to Triple Zero should not be withdrawn until equivalent or better emergency communications capability has been independently demonstrated under real-world operating conditions.