

Triple Zero Legislative and Regulatory Review

Supplement to original submission

Thank you for allowing me to provide supplemental comment on this review. The Telstra outage - which had impacts far beyond the Triple zero service - is a very timely reminder that the switchover from direct calls using 3G to a 'packet based' 4G method is not working well. According to this article on ABC News, the train system that went down for a day and a half - stranding many thousands of commuters - was previously run on 3G and forced to switch to 4G. Reportedly, the trains stopped when the sim cards in the train's computers wouldn't connect with the mobile provider and the satellite backup system didn't work.

<https://www.abc.net.au/news/2026-07-10/why-vline-was-hit-harder-than-other-states-by-telstra-outage/106895726>

<https://www.msn.com/en-au/money/news/real-impact-of-telstra-s-nationwide-outage/ar-AA27xc9H>

<https://www.msn.com/en-au/money/general/death-under-investigation-as-telstra-admits-600-triple-zero-calls-failed/ar-AA27tDHm>

<https://www.msn.com/en-au/news/australia/cops-probe-death-on-day-of-telstra-outage/ar-AA27vaxk>

The explanation for the outage provided by Telstra is rather dodgy: somebody changed the date on the timeclock to 2006. That has to be a typo as surely no-one in their right mind would deliberately change a date on a computer system to something way in the past. But if it was just a typo, then their quality control systems are either non-existent or highly insufficient.

The articles which describe the circumstances of a death during the outage is not unique. There have been deaths before due to an inability to reach 000. If I recall correctly, one was a death in northern NSW because the regional customer had such a poor signal on their phone that they could not communicate clearly enough before the call kept getting dropped. This was likely to have been one of those "fortuitous coverage" zones the telcos didn't want to properly upgrade once they shut down 3G.

<https://www.abc.net.au/news/2025-12-18/optus-releases-triple-zero-report-david-taylor-analysis/106158108>

The old 3G system for direct calls was far simpler to manage and maintain. The more complex computer systems get, the easier it is to fail them. Computers are "1 - 0" machines. The answer is either right or wrong and if it is wrong, the system stops. Failures like this Telstra outage will simply become more commonplace because the programming just gets more complex, more interwoven, and more susceptible to failure or the slightest possible mistake.

This outage demonstrates another reason to bring back 3G and legislate it as an essential service.

Thank your for reading my supplemental comments. My original submission is below so that you don't need to do two uploads.

Sincerely,
Deborah P.

Triple Zero Legislative and Regulatory Review

Due 30 June 2026

Thank you for taking comments on this review.

I am lucky in that when it came close to the end-date for 3G, I purchased a little 4G phone that had VOLTE. It is not a 'smart' phone and is Australian made. However, so many others purchased new and very expensive 4G/5G phones that then found out they didn't work because the government was blocking them. They could certainly make calls and maybe, perhaps one day – that user might actually need to call 000 which previously was handled under 3G. But nonetheless, that phone was blocked and the user was 'out' whatever it cost them – simply being told to "go buy another one".

On that front, I urge you to seriously consider the submissions of Mr. James Parker, an IT professional from Brisbane who I'm sure has gone into detail about the incompetence of how brands and models were tested and assessed. There were apparently a LOT of problems and everyday customers were the ones who got taken – all because at some point in their lives, they might need to call 000.

Your consultation paper shows the intention to migrate 000 from circuit-switched to packet-switched but that appears to be much of the problem. We never needed to have the blocking of phone models and the failures of the 000 service in the first place if 3G was left alone. The shutdown of 3G – which was recommended by the Senate RRAT committee NOT to be shut down – was handled badly and I would even go so far as to say demonstrated 'corporate malevolence' which was tolerated by government.

Why do we have Fair Trading departments and several government agencies to monitor and regulate telecommunications in Australia if all they are going to do is allow the telcos to bulldoze over the population and cause the extent of grief that they imposed by shutting down 3G? Companies operating in Australia are supposed to be ethical, to provide a product or service that customers want to use, and to be cost competitive. Allowing a company to be unresponsive, unethical and just plainly a bully is supposed to be prohibited. The consequences of shutting down 3G were insufficiently considered and at least a million plus customers were coerced into switching to something that would cost them dearly and didn't necessarily work. I feel it is important to look at the overall damage of shutting down 3G and not just the impacts it had on the provision of 000 services and the public's ability to access them – especially in regional/rural Australia.

- There were over 700,000 Australians still using 3G for voice calls at the time of shutdown (and most of these were likely in the regions/rural/remote). All those people had to buy new handsets at a time of significant cost of living/housing pressures.
- Many customers in regional/rural Australia lost all voice services because 4G towers had still not been installed and/or were not close enough because the higher the frequency, the shorter the distance.
- Telcos told the regional/rural customers they were in a "fortuitous coverage" area and therefore were not obligated to provide service. It was suggested they could purchase expensive booster antennas to put on their roofs (and for many, that still wasn't enough to generate sufficient signal). Telstra (at least) also took down the map from their website so that customers in those areas could not even check to see if they were entitled to have ANY phone service at all. (It was eventually replaced with a search option.)
- 3G was not just used for 000 and voice calls but for medic alerts, eftpos machines, flood gauges, farm equipment – ALL of which had to be replaced.
- All the replaced equipment - which still functioned perfectly well and would still be used today if 3G was running now – instantly became junk to be thrown out, creating a huge e-waste problem which

the telcos did not take responsibility for. Farmers in particular had to replace plant and the costs presented to senate hearings were in the range of \$20K EACH.

- When flooding occurred in NW Qld earlier in 2025, the flood gauges apparently had not been replaced yet and did not work so residents/farmers in outback Qld were uninformed about the extent of flooding, could not prepare and lost heaps of livestock and property damage.

I wrote to every agency, ministers, local MP's, Fair Trading, and to Telstra itself. I did an eight-page submission to the RRAT committee inquiry on the shutdown of 3G. What kind of response did the government provide? "It's a business and they can make whatever decisions they want". "Just go to satellite or Starlink". "Just buy another phone".

And what did Telstra itself tell me in its written response? "We shut down 3G to promote 5G". 3G was not shutdown because of low patronage (it wasn't low at all) but because they wanted to maximise the profits on 5G – obviously \$1.7 billion dollars profit the FY before wasn't enough. The telcos were happy to put a large segment of the Australian population, small businesses and councils under even more financial duress than they were already. The fact that 5G is USELESS in the bush meant nothing to them and the government's take that everybody outside a city should just go to satellite or Starlink shows equal disregard.

There is much more to say regarding the consequences of switching to higher frequencies and satellite based communication such as the expense to the consumer, the damage to the environment, and the aluminium dust now accumulating in the atmosphere. Did you know Starlink sats only last 8 years and are burned up in the atmosphere causing planet-wide pollution and future health disasters (aluminium causes dementia/alzheimer's). More than 1,000 of them have already been de-orbited. But that was the government's response to the end of 3G for people in regional/rural Australia – just go to Starlink (at your own expense of course).

However, since this review is only looking at options to eliminate the problems that have been occurring with 000 access since 3G was shutdown, I will strongly suggest that you need to BRING BACK 3G and legislate it as an essential service. This is especially important in the bush – in fact, if 2G was used for 000, you would get even more coverage throughout the vast outback. 000 is a voice only service and doesn't need to handle data so 2G would be perfectly acceptable.

This will also eliminate the need for the blocking of phones and allow the public to acquire perfectly acceptable devices at a much fairer price. This will allow people in regional/rural/remote Australia to have a reasonably priced phone service again and to have the same coverage they had previously. This will allow those with medic alerts to return to a much safer wearable device. (If I had to wear a medic alert for a heart condition, I would NOT want it to be running 4G while it is sitting on my chest. The stupid thing could kill me running a frequency like that near my heart. Even my little 4G phone has a warning in the user guide not to use the phone near any medical equipment.)

I realise that the government tends to tread all too lightly on the telcos (same goes for the banks) and does not want to force the telcos to 'toe the line' - but if they want to do business in Australia, they have to conduct business ethically and not coerce/extort their customers. The shutdown of 3G was a major mistake and not suitable to regional/rural Australia. Sometimes it is necessary to walk backwards and reverse a decision when it is the wrong one.

Thank you for reading. If you would like references for the comments I have made in this submission, please contact me.

Sincerely,
Deborah P.
resident of regional Queensland

(details provided separately)