

## Submission to the Triple Zero Legislative and Regulatory Review Consultation Paper

This submission is public

### Introduction

Thank you for the opportunity to provide feedback on the Triple Zero Legislative and Regulatory Review Consultation Paper. As an individual consumer who relies on an imported mobile device (a Huawei model legally purchased and imported), I am writing to express serious concerns regarding the current and proposed regulatory trajectory under Part 4 of the Emergency Call Service (ECS) Determination and the prospective mobile device register.

While I fully support the objective of ensuring a reliable emergency call service, I believe the current framework and proposed expansions risk over-regulating consumer technology, breaching civil liberties, and unfairly penalising citizens who choose to exercise consumer autonomy.

### Response to Section 2.1 & 2.2: Device Regulation and the Proposed Device Register

The consultation paper asks whether the legislative framework should allow the ACMA or the Minister to determine which classes of devices can reach Triple Zero, and notes that industry has suggested a mobile device register to block specific handsets.

Involuntary Disconnection is a Breach of Consumer Rights: Implementing a "whitelist" or a restrictive device register that allows network operators to block legally imported, functional devices is a severe overreach. A mobile phone is a critical tool for daily life, banking, and general safety. Blocking a handset entirely because it is a "grey import" or not officially certified by Australian carriers is disproportionate.

Flaws in Handset Identification: Many imported devices are entirely capable of making emergency calls via camp-on or standard IP network configurations. Blanket blocking policies based on manufacturer or region-of-origin data create a high risk of "false positives," where perfectly functional devices are cut off from network access without a technical failure occurring on the user's end.

Socio-Economic Impacts: Restricting network access to a narrow registry of carrier-approved devices harms price-conscious consumers, tech-savvy users, and migrant communities who bring completely functional devices from overseas.

### Balancing Public Safety with Individual Liberty (Question 3 & 4)

The framework must balance multi-modal access with system integrity. However, safeguarding the system should not mean locking out legitimate consumer electronics.

The Burden Should Be on Carriers and Manufacturers, Not Consumers: If a device has the technical capability to connect to a network band, the network should be required to attempt the carriage of an emergency voice call under the public interest principle of the TCPSS Act. The solution to complex IP packet routing should be solved through collaborative technical standards between operators and global manufacturers, not by blunt-force blocking of the consumer's property.

Informed Consent over Coercion: If a device is found to have a genuine technical limitation regarding Triple Zero (such as an inability to camp-on due to carrier-specific spectrum changes), the appropriate regulatory response is consumer education or point-of-sale warnings—not arbitrary network banishment.

### Conclusion

I urge the Triple Zero Custodian to ensure that the final report to the Government recommends a scalable framework that protects consumer choice and property rights. The regulations should firmly reject any mechanism that allows carriers to arbitrarily block legally imported mobile devices from accessing telecommunications networks, provided those devices conform to standard international wireless protocols.

Thank you for considering my submission.