NECWG-A/NZ Submission

Triple Zero Legislative and Regulatory Review
Consultation Response (May 2026)

Submitted by: National Emergency Communications Working Group – Australia/New Zealand (NECWG-A/NZ)

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NECWG-A/NZ welcomes the opportunity to contribute to the Triple Zero Legislative and Regulatory Review. This submission advocates for a modernised, principles-based and technology-neutral framework that reflects the transition to all-IP networks, increasing reliance on mobile and smart devices, and the emergence of multi-modal and autonomous emergency communications. Key considerations include:

- Development of a national Triple Zero strategy and adoption of frameworks to support multi-modal access (voice, text, data, video)
- Formal integration of device manufacturers and software ecosystems into the regulatory model
- Introduction of end-to-end performance accountability across all parties involved in call delivery to emergency service organisations.
- Development of certification frameworks for autonomous emergency contact technologies such as eCall and IoT devices
- Proactive regulatory oversight, system-wide assurance, and real-time reporting

NECWG-A/NZ provides the following responses:

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?**

NECWG-A/NZ supports the implementation of a modern framework that is principles-based and technology-neutral, with a focus on universal accessibility, reliability, interoperability, security,

resilience, and adaptability to future proof the service. Technology and service availability should be viewed through an accessibility lens meeting the diverse needs of our communities, including 24-hour access to interpretation services and non-voice communication options such as the National Relay Service.

Collaboration across stakeholders and clearly defined responsibilities across telecommunication providers, network operators, the Emergency Call Person and Emergency Service Organisations (ESOs) are essential in supporting the framework.

Principles should be implemented through an outcome-based framework that includes legislation, regulatory instruments, standards, and oversight. This should be holistic in application to the entire end-to-end service. The June 2025 NECWG White paper 'Emergency Communications in Australia' further expands on this topic.

Recommendation 4.3 of the June 2025 NECWG White paper 'Emergency Communications in Australia' calls for a robust research and industry engagement model, managed via the Triple Zero Custodian, to monitor evolving technology and coordinate analysis regarding its impact on the Emergency Call Service, including:

- monitoring industry developments in Apps, systems, and services that may have implications for the ECS.
- coordinating the analysis of these implications with the relevant stakeholders and Subject Matter Experts (SME), to determine where any regulatory or legislative instruments are applicable or should be developed.
- seeking amendment to, or creation of, appropriate regulation or legislation to minimise the disruption or impacts to the ECS.

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?**

Current frameworks remain predominantly voice-centric and lack clarity for IP-based, satellite, IoT, and application-layer emergency communications. These technologies are not clearly obligated or authorised to connect to Triple Zero. To expand the Triple Zero service from voice calls to multi-modal communications, consideration would need to be given to introducing technology neutral standards and extending obligations beyond telcos to include OTT platforms, device manufacturers (phones, vehicles, wearables), satellite and IoT providers to ensure emerging technologies are both permitted and accountable when accessing Triple Zero. New technology solutions should be part of a tightly integrated system where technology, regulation, and public education work together to guide user behaviour, reduce misuse, and preserve Triple Zero capacity for genuine emergencies.

Recommendation 2 of the NECWG White paper calls for the development of a National Emergency Contact Strategy to address changes in the way the community communicates during emergencies. The white paper highlights the need to develop an evidence base for preferences and implications of new contact methods. While there is a growing body of evidence that new generations prefer contact methods beyond the traditional voice options currently available to most emergency service users, there is little (if any) contemporary research on whether that extends to emergency services. To properly assess, prepare and plan for the capabilities that may be required for future emergency contact services, more robust research is needed. This will help to determine the true value and implications of investment in new contact methods and technologies as well as how they can be used most effectively in an emergency context.

The NECWG White paper also talks to the demand strains on the Triple Zero system driven by false alarms or duplicated reports from alternative contact methods. The development of an Emergency Contact Strategy would provide a framework to assess challenges and opportunities, how they might influence demand on the Emergency Contact System and how they can best be managed.

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

Mission-critical communications must continue to meet strict reliability thresholds and cannot compromise accessibility or safety. Balancing multi-modal access with reliability and redundancy in the Triple Zero framework requires shifting from voluntary industry guidelines to enforceable, technology-neutral mandates. Multi-modal access should include mandatory fallback to voice with clearly defined minimum performance standards, ensuring innovation does not compromise safety.

Support for expanded modalities into Triple Zero (including text, data, video and automated communications) should be contingent on the establishment of clear technical and operational standards. These should include minimum requirements for location accuracy, authentication of origin, interoperability across carriers and ESO systems, misuse management, fallback arrangements, and operational readiness within ESOs. This ensures that innovation enhances, rather than degrades, the reliability and consistency of the Triple Zero service.

Multi-modal access is essential not only to cope with technological advancements, but to provide improved accessibility for at risk communities including deaf, hard-of-hearing, rural/remote communities, culturally and linguistically diverse populations and those for whom making a voice call is unsafe due to circumstances. Consumer grade technology continues to improve accessibility for these various groups, however without clear integration options into Emergency Communications Services, these advancements are limited in their effectiveness.

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 the system?**

NECWG-A/NZ would support the ACMA and/or the Minister to have authority to approve or restrict device classes and services via transparent, standards-based mechanisms ensuring system integrity and interoperability.

Where the framework allows ACMA and/or the Minister to determine which class of devices can reach Triple Zero, there would be a requirement for such determinations to consider the accessibility needs of various communities (e.g. rural/regional, communication disability, deaf / hard of hearing, culturally and linguistically diverse groups.)

As the Emergency Call Service continues to transition to an all-IP network environment, cyber resilience should be recognised as a core element of system reliability. The legislative and regulatory framework should ensure that appropriate security, assurance and testing measures apply across all elements of the ecosystem, including networks, platforms, and connected devices. Consideration should also be given to how emergency communications infrastructure is treated within broader critical infrastructure frameworks.

5. **Should mobile device manufacturers be considered more centrally in the Triple Zero legislative and regulatory framework (such as under 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?**

NECWG-A/NZ would support consideration for device manufacturers to be formally incorporated into the regulatory framework, with obligations covering emergency call functionality, software capability and reliability, certification compliance and location accuracy. This could be extended to cater for device conformity for emergency communications with the ongoing technology lifecycle for communications standards (eg cessation of 3G, 4G).

6. **What outcomes should carriers, CSPs and ECP be accountable for in delivering Triple Zero calls, and what minimum requirements are needed to achieve those outcomes?**

Carriers, CSPS and the ECP all play a critical role in Triple Zero call delivery to ESOs. Key outcomes should include successful call delivery and cross network roaming, accurate location information, service continuity, and accessibility. Timely notifications to the public and emergency call service stakeholders are required during network outages. Minimum requirements should include end-to-end performance thresholds, location accuracy standards, and network availability targets. Regular end to end testing is required to identify any network vulnerabilities.

Consideration should be given to the end-to-end ecosystem, including the downhill component of the network. The Commonwealth/State based operating model for Emergency

Communications must be considered for any reform to be truly effective, with support provided to the jurisdictions in the enablement of any technological or process driven reform.

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?**

NECWG-A/NZ notes that proactive identification and rectification of systemic risks and issues is proposed under the Bean Review. NECWG-A/NZ supports a framework that includes continuous monitoring, incident reporting, root cause analysis, independent audits, and regulator-directed remediation. Consideration should be given to the Custodian or other relevant body developing capability to ingest and share data with key stakeholders. Sharing incident data and lessons learned across the ecosystem within appointed timeframes for remediation will support continuous improvement and alignment. Any continuous improvement opportunities should be incorporated with appropriate consideration given to implementation timeframes across the end-to-end ecosystem.

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?**

NECWG-A/NZ supports real-time notification of any confirmed or suspected impairment to Triple Zero call delivery. This includes expanded reporting across carriers and CSPs, encompassing call connection/success rates, latency, outage impacts, and location accuracy. The information must be fit-for-purpose with the framework developed in collaboration between carriers/CSPs, the ECP, and ESOs. Expanded reporting should be considered across the end-to-end ecosystem. Real-time reporting for critical metrics is recommended, including call/request delivery effectiveness, service reliability and availability, incident / outage management and service continuity.

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?**

Information sharing should be standardised, real-time, and secure, minimising operational burden on ESOs. Governance arrangements must also account for legislative and privacy requirements.

Location information, including AML, should be shared across all networks and present with a contact to Triple Zero, regardless of the network it is presented on. Mobile Network Operators and Mobile Virtual Network Operators in Australia must ensure that Caller Line Identification (CLI) and Sender ID information is registered and maintained to ensure that ESOs can rapidly

pinpoint a caller's location in an emergency. Expansion should be provided to introduce the Z-axis for location across the end-to-end ecosystem.

Telecommunication providers should share real time, automated notifications of network outages or degradations to the ACMA, ECP, ESOs and the public. A review of the current outage notification practice is required to ensure that notifications are standardised and contain information that clearly articulates the impact of the outage, alternative networks and methods for the community to seek emergency assistance and give guidance to ESOs on any other actions required. Notification protocols should be scaled to the level of impact. The method of notification should be commensurate with the severity, scope, and duration of the issue.

NECWG-A/NZ notes that stakeholders have recently provided feedback on the Triple Zero Custodian discussion paper on welfare checks. Additionally, NECWG-A/NZ advocates for a standardised approach, format, and agreed minimum standards for the information that is provided to ESOs as part of welfare check referrals (e.g. time of call failure, time of callback attempts or messages, mode and time of welfare checks, alongside billing details and any available Standardised Mobile Service Area (SMSA), location or tower details). This would reduce resource requirements of subsequent follow up and support community safety.

Data must be shared in a digestible and understandable format regarding roaming and fallback protocols, ensuring that devices can successfully route to alternative networks if the primary one fails.

Information should be shared in relation to device-specific Issues regarding handsets, software, etc affecting the ability to dial Triple Zero, with targeted public awareness campaigns.

Governance frameworks should ensure interoperability, privacy protection, and usability for ESOs.

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?**

NECWG-A/NZ supports the preservation of a national baseline while allowing ESOs flexibility to innovate in service delivery through additional capabilities layered above core access systems and processes. The NECWG White paper outlines how the emergency communications ecosystem operates and relies on a federated model. It must adhere to legislative responsibilities, budget capacities at national and state levels, and use systems that require a level of interoperability. A coordinated national approach with strong governance will be required to drive reform that maintains sovereignty while also retaining flexibility to adapt to changing conditions.

NECWG-A/NZ notes that while Triple Zero remains the critical national access point for emergency assistance, not all current and emerging emergency communications may require

centralised ingestion through a single entry point. As technologies evolve toward structured, data-rich and increasingly automated interactions, there is an opportunity for standards-based routing directly to the responsible Emergency Service Organisation (ESO), where there is clear certainty of purpose and jurisdiction. This reflects a federated, interoperable model that maintains a consistent public access experience while improving overall system efficiency, scalability and response outcomes.

To support innovation while maintaining national consistency, consideration may be given to national standards for access to Triple Zero, supporting state-level flexibility in operational systems, encouraging pilots for new approaches, and providing clear pathways for scaling successful innovations nationally- including both funding and implementation.

Implementation of any expanded access model or Emergency Contact Strategy should be phased and aligned to jurisdictional readiness. This includes consideration of technology uplift, workforce capability, operational integration, and sustainable funding arrangements for ESOs. Reform should not assume uniform readiness across jurisdictions and should incorporate staged delivery with defined entry criteria.

11. **Is there information that carriers, CSPs, and ECPs, hold that is not currently, but should be made available to ESOs through regulation to support the delivery of emergency services?**

ESOs should have access to enhanced location data and richer call metadata to improve situational awareness. This includes accurately registered fixed address and mobile owner details.

12. **Are there any additional regulatory powers and mechanisms the ACMA requires to regulate Triple Zero, especially to support a framework that is proactive and future focused?**

Recent 2025 legislation has strengthened ACMA by enabling it to direct carriers, CSPs and ECPs to take action or provide information on emergency call services, alongside more proactive oversight via the Triple Zero Custodian. NECWG-A/NZ supports any additional regulatory powers and mechanisms to transition from a reactive to proactive function, anticipating change and preparing for future enhancements or disruptors.

Consideration should be given to expanded regulatory powers to address SIM-less call misuse and support a proactive, future-focused framework. Device-level regulation and standards, identity and traceability mechanisms, and preventative misuse controls would seek to reduce non-genuine utilisation of Triple Zero. Consideration should be given to adopting the New Zealand approach of restricting SIM-less calls to Triple Zero.

13. **Are there barriers to the ACMA considering Triple Zero issues, or linking related infringements, to ensure issues indicating broader problems are addressed appropriately? If yes, what should change?**

NECWG-A/NZ supports a framework that strengthens the ability to identify systemic risks across the end to end environment, enabling clearer collection of data relating to incidents and fostering stronger, collective accountability across the industry.

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?**

Recent changes to the TCPSS Act are a step forward, however opportunities exist to define and achieve an effective balance between the roles of the ACMA and the Triple Zero Custodian. Clarification is required where system-wide issues arise that require both coordination and intervention. ACMA's powers continue to focus on responding to issues in a reactive role while the Custodian seeks to drive proactive, end-to-end improvements across the system. Recent changes have built a strong foundation, but additional developments will be required to ensure the Triple Zero ecosystem remains resilient, coordinated and fit for the future.

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

NECWG-A/NZ supports the Custodian having enhanced coordination powers, including oversight of resilience planning, cross-sector exercises, and system-wide improvement initiatives.