



Telecommunications
Industry
Ombudsman

TIO submission to the Triple Zero Custodian

Triple Zero Legislative and Regulatory
Review

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1 Introduction

Thank you for the opportunity to provide feedback to the Triple Zero Custodian (**Custodian**) on its Triple Zero legislative and regulatory framework review. The Telecommunications Industry Ombudsman (**the TIO**) offers information and insights to assist the Custodian through our unique complaints handling perspective.

The TIO provides a fair, independent, and accessible external dispute resolution (**EDR**) service for individual consumers, occupiers and owners of property, small businesses and not-for-profits who have been unable to resolve their complaint with a phone or internet service provider. The TIO welcomes strengthening the Triple Zero regulatory and legislative framework to increase reliable access to emergency services.

As the EDR scheme for the telco sector, we are uniquely placed to provide insights through our complaints data on how the Triple Zero ecosystem operates in practice for consumers. The Triple Zero-related complaints we receive mostly relate to concerns about coverage, reliability issues and corresponding potential difficulties accessing Triple Zero.

Our recent [Quarter 3 FY26 Report](#) highlighted¹ that the TIO received over 340 complaints relating to Triple Zero and emergency services between January and March 2026.

Approximately 60 of those complaints were from people who told us that they or another person were unable to reach or maintain a clear and stable call with Triple Zero or emergency services due to issues such as network outages, poor mobile coverage, or handset compatibility issues.² The most common reason for calling Triple Zero was for a medical issue or emergency, followed by test calling to check that the service actually worked. The remaining complaints were made by consumers concerned about not having a reliable service if an emergency happened in the future.

As part of strengthening the Triple Zero legislative and regulatory framework, we support increased transparency and regular reporting from carriers and carriage service providers who deliver access to the Triple Zero service. Regular reporting of performance benchmarks and of any failed Triple Zero calls should be undertaken, so that relevant bodies in the Triple Zero ecosystem have adequate information to inform and support their important work.

¹ On page 6.

² Most complaints handled by the TIO are resolved through a single referral of that complaint to the service provider, and only a small proportion of these complaints require further investigation or conciliation. Due to our limited involvement in these complaints, we often cannot confirm whether a Triple Zero outage has occurred.



Our submission makes further suggestions about how the Triple Zero legislative and regulatory framework could be improved, based on our experience dealing with relevant complaints. We support a more holistic approach to regulating Triple Zero, with greater consideration of mobile device manufacturers, robust information sharing across the ecosystem, and clearer information for consumers.

Case Study 1: Sapphire Phones gave Hamish* a mobile phone, but he found it was unreliable when he needed it

Hamish has a mobile service with Sapphire Phones. Hamish has a life-threatening medical condition and needs reliable access to Triple Zero at all times. One day, he found his mobile phone stopped being able to make phone calls. When he contacted Sapphire Phones about this, it told him it had blocked the phone from its network because the phone was no longer able to call Triple Zero. As a replacement for the blocked phone, Sapphire Phones posted Hamish a new phone. Ever since he started using the replacement phone, Hamish has experienced ongoing battery issues with it, and his mobile service regularly drops out.

Recently, Hamish had a serious medical episode and found his phone battery died when he needed to call Triple Zero. Hamish reached out to the TIO to help resolve his complaint.

**Names of all parties have been changed.*

Case Study 2: Mabel* could not call Triple Zero when travelling in regional Western Australia

Mabel has a mobile service with KoalaComm. Recently, her car broke down in a regional area in Western Australia while she was travelling with family. During the road trip, Mabel's father injured his leg and needed urgent medical assistance.

Mabel tried to call Triple Zero from her mobile, but the call didn't work. The family were stranded until a passerby called Triple Zero for them. A week later, Mabel questioned KoalaComm about why the emergency call did not work, but KoalaComm denied responsibility, and said mobile coverage was not reliable in the location Mabel needed to make her Triple Zero call. Mabel then approached the TIO for help.

**Names and location of all parties have been changed.*

2 The framework should appropriately recognise and address the role of mobile devices in Triple Zero access

As mobile services are the main way Australians call Triple Zero, it is critically important that the Triple Zero legislative and regulatory framework supports reliable access to Triple Zero via mobile services, and fosters consumer trust and confidence in the system.

In our view, the framework could benefit from taking a more holistic approach to regulating the Triple Zero ecosystem, particularly in relation to mobile services. This could be achieved by further integrating mobile device manufacturers into the framework, providing for a higher level of information sharing between relevant stakeholders, and creating a mobile device register for devices compatible with emergency calling.

2.1 Consumers do not always have access to accurate and consistent information about mobile device compatibility with emergency calling

Amendments to the *Telecommunications (Emergency Call Service) Determination 2019 (ECS Determination)* in late 2024 introduced requirements aimed at ensuring all mobile devices used in Australia can contact the Emergency Call Service on all Australian public mobile networks. These changes formed part of the government's response to the Optus Outage of 8 November 2023, and aimed to address concerns that some consumers had been unable to call Triple Zero during that outage. They also coincided with the shutdown of Australia's remaining 3G mobile networks in October 2024,³ which resulted in many consumers needing to replace older or imported handsets with newer devices that were compatible with Australia's 4G and 5G mobile networks.

Broadly, the new rules required a telco to block any mobile handset from accessing its network if the handset was not configured to be able to call the Emergency Call Service on its own network, or on any other public mobile network, if its own network was unavailable (**Handset Blocking Rules**). We continue to support the policy intent of ensuring that all mobile devices in use on Australian mobile networks can call Triple Zero on any Australian mobile network.

³ Telstra and Optus shut down their 3G networks in October 2024. Vodafone/TPG shut down its 3G network in January 2024.

However, since the Handset Blocking Rules were introduced, complaints to our office have shown that some consumers have difficulty accessing accurate and consistent information about whether their handset is able to call Triple Zero, or will need to be blocked under the Rules. Confusion and inconsistent information about these issues sometimes manifest as consumers disputing that their handset needs to be blocked, or asserting (based on their own research) that a handset can call Triple Zero when their telco says it cannot.

We hear from consumers that they have received inconsistent information about the emergency calling capabilities of handsets from different Mobile Network Operators (**MNOs**), Mobile Virtual Network Operators (**MVNOs**), device manufacturers, and the Australian Mobile Telecommunications Association (**AMTA**).

Case Study 3: Faye* told us a handset she bought for her grandmother was blocked, after she checked the device using AMTA's 'Check My Device' website

Faye contacted our office earlier this year after a mobile handset she had bought for her grandmother to use was blocked by her mobile provider, Tui Telco. She said Tui Telco had blocked the handset from its network because the handset could not make calls to Triple Zero.

Faye was concerned that the handset had been blocked by Tui Telco even though she had checked the device using AMTA's 'Check My Device' website. She said the website had indicated the handset was not affected by the 2024 3G shutdown and met emergency calling requirements.**

**Names of all parties have been changed.*

***At time of writing, AMTA's 'Check My Device' webpage displayed text making clear that its device checking tool has not been updated since October 2024 and may contain outdated information. It directed users to check the status of mobile devices using their mobile operator's official website.*

From the perspective of an average consumer, it may not always be clear what the best source of truth is on these matters. Where they receive inconsistent information from different apparently credible sources, they may conclude their telco is incorrect in blocking their handset or has some ulterior motive for doing so. For example, consumers sometimes tell us they think their telco has blocked a handset purchased from a third-party vendor so that *the telco* has an opportunity to sell them a new handset.



2.2 We support a mobile device register for Triple Zero-compatible devices

The consultation paper notes industry stakeholders have suggested that a register containing information about the emergency calling capabilities of mobile devices could be beneficial to industry and the community. We support such a register, as it would assist telcos and consumers to identify devices that are compatible with emergency calling, and devices that need to be blocked by telcos under the Handset Blocking Rules.

As noted above, complaints to our office show there is sometimes confusion between telcos and consumers about what devices must be blocked under the Handset Blocking Rules. As we discuss at 2.4 below, we also see scenarios where a consumer says their handset has been blocked by one telco but not by another.

In the absence of a clear, centralised and authoritative source of information about what mobile devices are compatible with emergency calling, consumers risk wasting money on devices that will ultimately be blocked by telcos under the Handset Blocking Rules. There is also a risk that without access to such information, consumers may be more likely to lodge complaints about device-blocking processes. In our experience, these complaints are often very time-consuming for all parties, and rarely result in a telco unblocking a consumer's handset.

A clear and authoritative source of information consumers could use to check device compatibility with emergency calling (such as a register) would help telcos and our office explain to consumers why certain devices have been blocked from accessing mobile networks. It would also help telcos ensure they take a more consistent approach to device-blocking.

2.3 An effective framework would consider the role of mobile device manufacturers more centrally

The Custodian's consultation paper asks for feedback on whether mobile device manufacturers should be considered more centrally in the Triple Zero legislative and regulatory framework. In our view, device manufacturers will likely need to be more centrally regulated, for the framework to function optimally.



As highlighted in the Custodian’s consultation paper, when using IP-based mobile technologies like 4G (LTE) and 5G (NR) for emergency voice calls, there is a greater reliance on device-side features and settings than when using more traditional circuit-switched networks. Typically, device manufacturers are responsible for developing and updating device software. Where software updates are required to correct problems accessing Triple Zero, we understand that MNOs liaise with device manufacturers to develop those updates. Device manufacturers are also involved in the mobile device testing regime that operates under the Emergency Calling – Network and Mobile Phone Testing Industry Code.

Through our complaints, we sometimes hear from telcos that a problem affecting a consumer’s ability to call Triple Zero has been caused by settings or software problems on a consumer’s mobile device. For example, in late 2025 it was discovered that some models of Samsung mobile handsets were unable to call Triple Zero on every public mobile network, and required software updates to ensure they could do so.⁴ In these circumstances, telcos sometimes refer the consumer to the device’s manufacturer for further information or assistance. Consumers sometimes tell us that the manufacturer of a device gave them different information about their device’s ability to call Triple Zero to the information provided by their telco. Occasionally, we see confusion among consumers about who is responsible for providing software updates.

Case study 4: Reggie’s* handset needed a software update to call Triple Zero using WiFi calling – he said the manufacturer told him Rosie Telco had delayed the software update

Reggie lives in an area with very poor mobile coverage, and has no useable mobile coverage inside his home. Because of this, he relies heavily on WiFi calling when making telephone calls from his home. In early 2025, Reggie needed to call Triple Zero for help from his local fire service, but his call did not connect. Luckily, Reggie was able to call a friend, who then called Triple Zero on his behalf.

When Reggie contacted Rosie Telco about the failed call, it told him his mobile device should be compatible with emergency calling on its network. After investigating the matter, Rosie Telco advised Reggie’s call had failed because there was a software problem with his device that the device’s manufacturer needed to fix. Reggie was able to fix the problem by updating his phone’s system software, but he was concerned other people could be affected by the WiFi calling problem.

⁴ A small number of older handset models that Samsung no longer supported with software updates needed to be replaced with newer models.



Reggie told us he had asked his phone's manufacturer about the problem as well. He said the manufacturer told him that it had known about the problem for months, but that Rosie Telco had delayed issuing the software update to fix it.

While Reggie was satisfied that his phone could now make Triple Zero calls, he expressed concern to the TIO that he had received different and contradictory information from Rosie Telco and the phone's manufacturer about who was responsible for fixing the problem.

**Names of all parties have been changed.*

We anticipate that effective regulation of the Triple Zero ecosystem will require a more holistic approach that sets robust obligations for device manufacturers as well as telcos. This could ensure a more consistent approach across the ecosystem and a more reliable and predictable experience for consumers. For example, regulation that centrally considers device manufacturers could set legislative expectations about how long a device manufacturer must support a device with software updates to ensure the device can continue to call Triple Zero.

2.4 Greater information sharing between MNOs, MVNOs and device manufacturers would support a consistent approach to device blocking

Robust requirements for MNOs, MVNOs, and device manufacturers to share information about the emergency calling capabilities of mobile devices would support a consistent approach to mobile device blocking under the Handset Blocking Rules. This would help to build consumer trust in the need for device blocking to ensure a well-functioning Triple Zero ecosystem.

Complaints we receive about issues relating to mobile device blocking suggest there may not be sufficient measures in place for MNOs, MVNOs, and device manufacturers to share information about these matters. Complaints to our office show that telcos sometimes take an inconsistent approach to blocking mobile devices under the Handset Blocking Rules. We understand that under the Rules, telcos must block a handset if it is not configured to access the Emergency Call Service using *any* of Australia's public mobile networks. In theory, this means a handset that is blocked on one public mobile network should be blocked on all of them.

However, it is not uncommon for consumers to complain to our office that their mobile handset has been blocked by one telco under the Handset Blocking Rules even though the handset continues to work (and has not been blocked) when using another telco's network. Consumers sometimes tell us they believe the fact their handset has not been blocked by one telco means it is compatible with emergency calling, and therefore should not be blocked at all.



Case Study 5: Harper's* mobile phone was blocked by one telco, but not by others

Harper told us Dune Dial blocked her mobile phone from its network after she ported her service to Dune Dial late last year. Although Dune Dial told her it had blocked the device because it was not configured to access Triple Zero, Harper disputed this. Harper believed her handset was able to call Triple Zero, in part because the handset had not been blocked from accessing the network of her previous mobile provider, Beach Tel. Harper told us she had done her own research and had been able to confirm her device was able to call Triple Zero. She wanted Dune Dial to unblock the handset.

Dune Dial refused to unblock the handset. Dissatisfied, Harper ultimately ported her mobile number away from Dune Dial to a third provider, Salt Talk. She told us that after porting the number to Salt Talk, she was able to continue using her handset normally with the Salt Talk service, because Salt Talk had not blocked the handset from its network.

It is unclear why the handset was blocked from Dune Dial's mobile network, but not from Salt Talk's network.

**Names of all parties have been changed.*

2.5 Government should clarify emergency camp-on obligations for mobile carriers

In 2025 the ECS Determination was amended to provide more robust obligations for carriers when carrying emergency calls. Among other changes, these amendments added a new section 74 to the Determination. Broadly, section 74 requires carriers that operate public mobile networks to ensure they provide and facilitate emergency camp-on functionality.⁵ We understand that as currently drafted, section 74 only applies when there is a 'major outage' or 'significant local outage' that affects an end-user's ability to call Triple Zero or 112.⁶

⁵ Emergency camp-on functionality is a process initiated by an end-user's mobile phone, where the phone accesses the Emergency Call Service using a mobile network other than the end-user's usual mobile network. It is used where the end-user's phone cannot access their usual mobile network for any reason, and is intended to allow a mobile phone to access the Emergency Call Service using any available mobile network that can carry the call.

⁶ See subsection 74(1), which provides that the section applies 'if there is a major outage or significant local outage in a mobile network operated or controlled by a carrier that affects an end-user's ability to make an emergency call to the emergency call person for 000 or 112'. For these purposes, the ECS Determination adopts the definitions of 'major outage' and 'significant local outage' used in the *Telecommunications (Customer Communications for Outages) Industry Standard 2024*.

Given the critical importance of consumers being able to access the Emergency Call Service using mobile phones, it is not clear to us why section 74 is limited in this way. Individual consumers may be unable to access emergency calling using their regular mobile provider's network for reasons that are not related to an outage that would satisfy the definition of 'major outage' or 'significant local outage'. For example, the consumer may be affected by an outage that has not lasted long enough or affected enough mobile services to qualify as a 'significant local outage'.⁷ They may alternatively be in a location where their mobile carrier provides no coverage (but another carrier does provide coverage).

We appreciate that in practice, mobile carriers provide emergency camp-on functionality generally, as a feature that operates whether or not any network is subject to an outage. Government should consider whether section 74 of the ECS Determination should be amended to make clear that mobile carriers must provide emergency camp-on functionality at all times, irrespective of whether there is a major outage or significant local outage.

3 The system may benefit from a simple mechanism for our office to share information with the Custodian

Complaints to our office can be a valuable source of information about issues relating to Triple Zero access. We have provided high level descriptions of de-identified complaints to government in recent inquiries and consultations, however we believe more detailed complaints information could be useful to the Custodian in performing its work.

We are currently limited in the information we can share with the Custodian by our privacy obligations. Government should consider a mechanism that allows the TIO to share information in a way that balances protection of individuals' privacy with timely insight for the Custodian into the circumstances of people unable to connect to the Triple Zero service.

⁷ Broadly, to satisfy the definition of 'significant local outage', an outage must be unplanned, and must affect (or be likely to affect) at least 1000 services in operation in regional Australia for at least six hours, or at least 250 services in operation in remote Australia for at least three hours.

4 More education is needed about Triple Zero calls

Our office receives complaints from consumers who may not understand how Triple Zero calls work, or who are misinformed when making emergency calls. We see complaints that suggest there is a general lack of understanding in the public domain about how camp-on issues can impact Triple Zero calls. If a handset needs to make use of emergency camp-on to facilitate a Triple Zero call, delays can occur while waiting for the call to be rerouted to an alternative mobile network. This process may lead some consumers to end an emergency call prematurely, believing the call failed, when instead they may have needed to stay on the line so camp-on could reroute their call.

We also receive complaints from some consumers who appear to be confused about the operation of 112 calls, or may be misinformed about how these calls intersect with Triple Zero calls. Our complaints show some consumers may believe that dialling 112 is more effective than dialling Triple Zero to reach emergency services, even if their handset has been blocked. Other consumers may believe that calling 112 reroutes their call to an available network, even if their handset cannot call Triple Zero.

These types of complaints highlight that conflicting information and confusion exist within the community and more guidance is needed about how emergency calls operate. Increased education and robust guidance for the community could reduce any misconceptions about 112 calls and ensure consumers know what they need to do for emergency camp-on to work.

Case Study 6: Isla* thought she was only able to get through to emergency services by calling 112

Isla has a mobile service with Blizzard Net. Isla is a carer for her elderly father and needs reliable mobile service for emergency calls. Recently, Isla called Triple Zero and thought the call did not go through, so she decided to call 112 instead for an ambulance.

Even though she experienced a delay in the call, Isla was relieved to get help, and told us she thought that if she had not called 112, she would not have been able to contact an ambulance for her father in time.

**Names of all parties have been changed.*