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26 SEP 2014

The Hon Malcolm Turnbull MP  
Minister for Communications  
Parliament House  
CANBERRA ACT 2600

Dear Minister Turnbull

I am writing in relation to your correspondence to the Tasmanian Government advising that the Department of Communications would be launching a review of the national Triple Zero (000) operator and inviting a submission.

Please find attached the Tasmanian Government submission.

In your correspondence you request a contact point in the Tasmanian Government for Triple Zero policy matters. The Tasmanian contact is Mr Simon Roberts, Assistant Director, Office of Security and Emergency Management, Department of Premier and Cabinet. Mr Roberts can be contacted by email at [Simon.Roberts@dpac.tas.gov.au](mailto:Simon.Roberts@dpac.tas.gov.au) or by telephone on (03) 6232 7305.

Thank you for advising the Tasmanian Government of this review.

Yours sincerely

Will Hodgman MP  
**Premier**

Attachment

Copy to: Minister for Health  
Minister for Police and Emergency Management

# Department of Communications

Review of the National Triple Zero (000)  
Operator

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## Introduction

The Tasmanian Government welcomes the opportunity to comment on the Review of the Triple Zero Operator. The service is a valuable element of our emergency arrangements and one that has proven its worth repeatedly. The Triple Zero number has become a highly known and trusted capability that the Australian community relies on in times of crisis.

The Tasmanian Government has been involved in the National Emergency Communications Working Group (NECWG) and the Triple Zero Working Group (TZWG). We value the efforts of the NECWG in considering what a future Triple Zero service may look like through the Next Generation Triple Zero (NG000) Project.

The Tasmanian Government also notes that certain aspects of the Triple Zero service are beyond the scope of the review, including state and territory responsibility for the dispatch of emergency assistance by emergency service organisations, the National Relay Service, the 106 teletypewriter emergency number, the emergency alert system, and other non-Triple Zero emergency arrangements. These important activities do not exist in isolation from the Triple Zero service. Instead, they complement and enhance it. Any changes to the National Triple Zero service will undoubtedly have an impact on the activities identified. To undertake a review of the Triple Zero service without considering the entirety of the arrangements will likely lead to an outcome that is less than optimal and be inconsistent with the expectations of the Australian community.

It is in this context that the Tasmanian Government provides the following comments for the consideration of the Review.

## Question 1 Community Expectations

**It is commonly accepted that the community expects the Triple Zero service to be contactable anytime, anywhere, easily, quickly and free of charge**

**Are these your expectation of the Triple Zero service now and into the future? Are your expectations currently being met? Why or why not?**

The issues paper prepared by the Department of Communications identifies five commonly accepted expectations that underpin the operation of the Triple Zero service. These should be seen as a minimum set of capabilities for the Triple Zero service. Any proposed changes to any aspect of the Triple Zero service should be tested against these expectations to ensure that they continue to be met.

The Tasmanian Government regards the principles of being able to contact the Triple Zero service at anytime, from anywhere and free of charge as being legitimate expectations of the community. At present, for a voice call from a standard telephone service, the expectations of the Triple Zero service are generally met. There are, however, some limitations with mobile phone and Voice over Internet Protocol (VoIP) services. These are related to both the ability of telecommunication providers to provide the national operator and emergency services organisations with location information and the reliability, capability or existence of the telecommunications network.

As the issues paper observes, 67 per cent of calls to the Triple Zero service during 2012-13 came from mobile telephones. Mobile black spots are, however, an issue that continues to affect the availability of the Triple Zero service particularly in more remote areas of Australia. The *2013 Tasmanian Bushfires Inquiry* (the Inquiry) found that improved mobile network coverage and greater redundancy is desirable in vulnerable areas that risk becoming isolated in emergency events. Tasmanian communities are increasingly reliant on mobile phone communications for emergency purposes. Many of our remote communities require better network coverage to contact Triple Zero and reduce the impact of emergency events. It should be noted that better coverage may mean not only an extended footprint but also greater network capacity and greater depth of coverage (alleviation of dead spots through greater signal strength and density of towers).

The community expectation that the Triple Zero service will be contactable anytime and anywhere is extending to the expectation of the ability to make an emergency call via communication channels other than voice. It is likely that community expectations of access to emergency services via existing and future non-voice channels will continue to grow and as new communications channel becomes established in the market, an expectation of use of that channel to contact Triple Zero will develop. At present, for communication channels other than voice services, there is no ability to contact the Triple Zero service, with the exception of the 106 service, which is necessarily limited to a specific client group.

While some of these issues are being addressed by the NG000 Project, any solutions will require ongoing funding and likely regulatory changes to enable implementation and there will be implications for the operations and infrastructure of the national operator and the Emergency Service Organisations (ESOs). In addition, the expectations of the community will need to be carefully managed in relation to what can be reasonably provided.

## **Question 2 Challenges facing the Triple Zero service**

**Ongoing changes in the communication landscape and certain expectations in the community regarding the nature of the service, present challenges for the Triple Zero service. These challenges include locating callers, the quality of prioritisation of VoIP calls, extreme call volumes during disasters and non-emergency calls.**

**What are your views on these challenges and what further steps could be taken to address them? What other challenges need to be considered?**

The challenges presented to the Triple Zero service by the ongoing changes to the communications landscape have, in the past, generally resulted in the service seeking to 'catch up' with the changes after they have occurred. This is inevitable given the nature of changes in communications technology, in particular the rate of community uptake of changes and new technology. For example, the uptake of mobile phones presented the challenges to the Triple Zero service of both identifying the location of a caller and responding to the increase in call volume as the accessibility and numbers of phones expanded. The availability and uptake of SMS, smartphones and social media channels have also led to expectations in the community of accessibility to the Triple Zero service via these channels. While the Triple Zero service response to these issues form the objectives of the NG000 project, this process needs to be ongoing and should seek to assess the potential impact of emerging technologies, channels and community expectations.

The response of the Triple Zero service to changing expectations needs to be as rapid as possible. However, responding to the challenges faced by changing expectations is complex as any enhancement in the capability would, by necessity, require a complementary action to take place within each emergency service. The desirability for emergency services, who each deliver their own unique service to the community, to adopt any enhancements needs to be carefully considered and would ultimately be driven by factors that are largely outside of the control of the ESOs. This includes, for example, the availability of third party telecommunication infrastructure.

More fundamentally, however, is that it would not be desirable to have individual jurisdictions adopting different methods to contact the Triple Zero service as this would compromise the objective of the service as offering a common experience for callers across Australia.

## *2.1 Identifying the location of callers*

The use of mobile phones to contact the Triple Zero service presents difficulties in identifying the location of a caller and given this is the single most important piece of information on which any response is based, is not a matter than should be understated. While recent improvements have been made, the use of these is largely determined by the capabilities of the mobile network and the nature of the location identified (rural and remote – if mobile coverage is available and urban areas).

The Tasmanian Government would be willing to examine proposals to use mobile phones' GPS capabilities to provide more accurate, dynamic location information and notes that this issue is expected to be addressed for mobile phones with the current development of the Push Mobile Location Information service (Push MoLI).

## *2.2 Quality and prioritisation of VoIP calls*

The increase in the use of VoIP is causing challenges for all emergency service organisations. The reliability of VoIP calls to the Triple Zero service, due to the dependency on the power supply and the need for a reliable internet service are significant concerns. There is also no apparent solution for identifying the location of VoIP services. This will become an increasing issue with the expected increase in the proportion of VoIP calls to the Triple Zero service as the rollout of the National Broadband Network proceeds.

## *2.3 Management of call volumes during disasters*

The Tasmanian Government has experience with managing a high volume of calls during an emergency event. The approach of the State is to use information lines, *Emergency Alert* and government websites to manage call volumes. These services are in addition to existing arrangements such as the Police Assistance Line (131 444).

### *2.3.1 Tasmanian Emergency Information Service*

The Tasmanian Emergency Information Service (TEIS) is a dedicated 1800 number owned and maintained by the Tasmanian Government that is specifically intended to reduce general information seeking calls to emergency services during disasters. Established in 2009, its purpose is to provide a single point of contact for government information during an emergency or disaster. It does not replace existing emergency service contacts but instead provides a communications capability for all government agencies that may wish to provide information during an emergency.



The TEIS uses existing Government contact centre resources linked into one scalable queue. When activated, calls to the 1800 number have priority over any other call to the contact centres participating in the TEIS queue.

The TEIS was most recently used during the response phase of the January 2013 bushfires. The capability was activated to reduce demand on the Tasmania Fire Service (TFS). At its peak, during the first day of the fire, the TFS received over 5 500 calls. By way of comparison, during the same period calls transferred to the TFS by the Triple Zero service amounted to 744. This is illustrated in Figure 1 below.

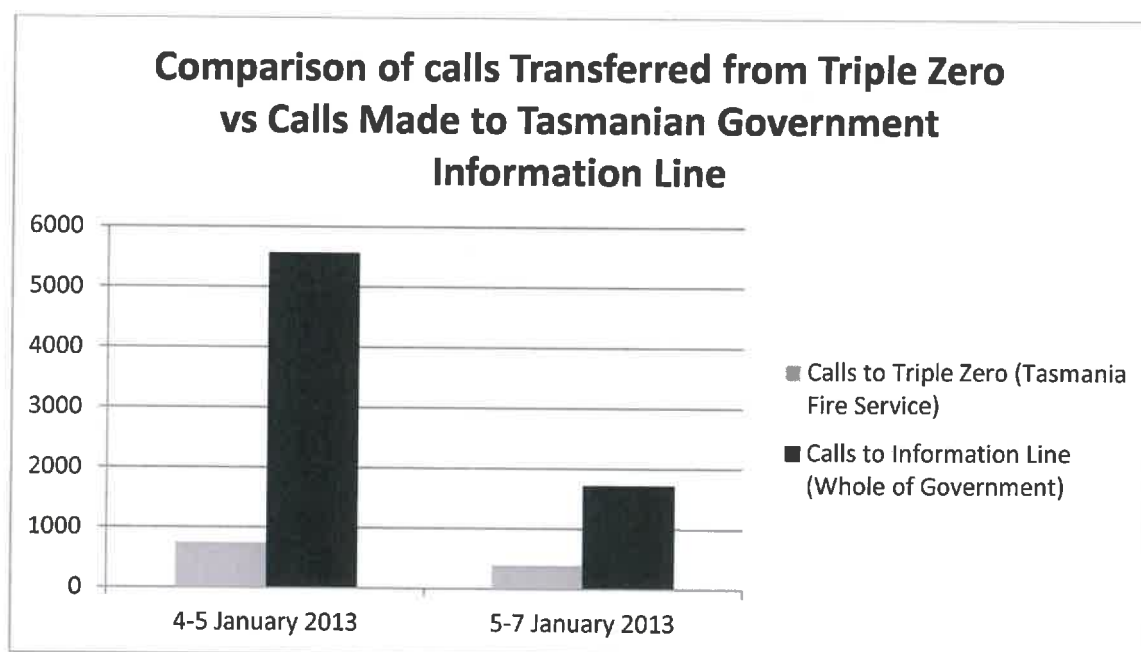


Figure 1

### 2.3.2 Emergency Alert

During the period 4-5 January 2014, the TFS sent 21 683 *Emergency Alert* messages to the community. These messages directed the community to the TFS website and ABC local radio for information about the bushfires.

While there are limitations in the length of messages that can be issued, there is sufficient capability to send information to the community to advise them of the best places to source information from. This, like the provision of general information lines, reduces the likelihood of a person calling the Triple Zero service unnecessarily.

### 2.3.3 TasAlert

The Tasmanian Government has also recently introduced the TasALERT, the official online source of emergency information from emergency services and government agencies.

The TasALERT website and social media accounts operate during all hazards - bushfire, flood, storm, landslide, tsunami, earthquake, pandemic, biosecurity, terrorism and energy emergencies. TasALERT conveys emergency warnings and information that is timely, detailed and location specific. This tailored information ensures that people receive information that is relevant to them, without having to visit agencies' websites separately. The website aggregates social media feeds from across the Tasmanian Government and during an emergency provides dedicated 'incident pages' that display all available official information, including geo-spatial and social media content.

The information TasALERT posts on its website and social media equips communities with the official resources they need to plan, and prepare for, respond to and recover from disasters. This is an important role of TasALERT. By engaging directly with the public through the TasALERT social media channels, the Tasmanian Government can actively reduce demand on the Triple Zero service by managing rumours and correcting misinformation that may have traditionally resulted in members of the public contacting the Triple Zero service.

#### 2.4 *Sim-less mobile phones*

A specific issue presenting a challenge to the Triple Zero service is ability to call Triple Zero from a mobile phone without a SIM. A high proportion of these calls are nuisance calls, and past surveys have failed to identify any genuine calls from SIM-less mobiles to the Triple Zero service. Other jurisdictions have blocked access to the emergency call service from SIM-less mobiles, with a subsequent reduction in nuisance calls, and no apparent adverse events.

#### 2.5 *Non-emergency calls*

Ongoing community education as to the role of the of Triple Zero service is extremely important.

State and territory governments invest significant time and resources into both providing alternative information sources (such as the arrangements outlined above) and educating the community about the purpose of the Triple Zero service. Initiatives such as that undertaken by the Triple Zero Awareness Working Group that developed a smartphone app for iOS and Android devices to:

- provide the caller with information about when to call Triple Zero;
- provide the caller with information about who to call in various non-emergency situations:
  - o State Emergency Service (SES) (132 500)
  - o Police Assistance Line (131 444)
  - o Crime Stoppers (1800 333 000)
  - o Health Direct Australia (1800 022 222)
  - o National Relay Service;
- assist the caller to dial the relevant number; and
- display the GPS coordinates of the phone's location that the caller can read out to the emergency operator.



Similarly, the national Triple Zero campaign aims to build awareness of the Triple Zero number and educate the community about when to use it. The campaign also serves to reinforce to members of the public their responsibilities when calling Triple Zero in nominating the required emergency service and identifying the location they are calling from.

The campaign uses the internet, newspapers, radio and television to promote messages regarding Triple Zero. In addition, elements of the campaign have been translated to reach culturally and linguistically diverse communities throughout Australia.

The reality of malicious calls being made to the Triple Zero service is, in the view of the Tasmanian Government, not one that is easily addressed through education or legislative means. Like all jurisdictions, nuisance or malicious calls to the Triple Zero service are considered a criminal act, while this acts as a deterrent it cannot eliminate such calls being made.

The Tasmanian Government notes, however, that the minimisation of non-emergency calls to the Triple Zero service is a specific regulatory requirement on carriers. This matter is discussed further at Question 6.

### **Question 3 Other ways of requesting emergency assistance**

**The only way of contacting Triple Zero is with a voice call and this is likely to remain the primary way of requesting emergency assistance. However, people use a range of other ways to communicate, including SMS, email, instant messaging, video calls and social media.**

**In addition to voice calls, is it desirable to have other ways of requesting emergency assistance? If so, what ways and what challenges do you foresee?**

The increasing use of SMS, email, instant messaging, video calls and social media by the community provides an opportunity for enhancements to be made to the Triple Zero service. However, the State is not convinced of the current suitability of all these methods for contacting the Triple Zero service.

While there are undoubtedly opportunities presented by the growth in new communication technologies and channels and the potential for alternate methods of contact, the central focus should be on maintaining voice as the primary means of contacting the Triple Zero service. Alternative channels such as SMS, video calling and automated devices have significant potential for improving access to Triple Zero and emergency services in specific situations or for specific client groups but these measures need to be assessed against the primary purpose of the Triple Zero service to provide an emergency voice-based response capability.

An initial approach could be to first focus on those opportunities that seek to address the issues that are consistent across all emergency services and present the greatest opportunities for real outcomes to be delivered. This could include for example, the ability of emergency services to reduce demand on the Triple Zero service by providing alternative contact points for non-emergency assistance, including the provision of general advice about a significant emergency or the use of Emergency Alert to direct people to contacts other than the Triple Zero service. Once these issues are addressed, it would provide a better basis for considering how the alternatives to contacting the Triple Zero service could be progressed. These opportunities are discussed further at Question 6 below.

## **Question 4 Improving information**

**It is important that emergency service organisations, as well as callers, have the information they need in an emergency. Changes in technology offer opportunities to improve the information available, however, these changes also present some challenges.**

**What information is essential to emergency service organisations and callers in an emergency and what information is desirable?**

Detailed and reliable information is essential to any ESO response to an incident. In this regard, the essential information that is required is the name and location of the caller, the nature of the emergency and any particular hazards or issues that emergency responders may face. The Tasmanian Government would support proposals to enhance this core information, such as using the GPS capabilities of a smartphone to assist with more accurately locating a person, before including additional capabilities such as video. Expanding what is essential beyond the core requirements of name and location and other defined information may impact on the ability to provide the Triple Zero service. Also, as expressed above, the unique needs of an emergency service may make defining what is essential and the consistent collection of additional information difficult to achieve across all organisations.

## **Question 5 The role of the national Triple Zero operator**

**A tender for the national Triple Zero operator is required to be issued by June 2016. The aim of this review is to ensure that the arrangements for the national Triple Zero operator continues to support a world class Triple Zero service into the future.**

**What criteria should be used to determine the functions of the national operator?**

The fundamental requirement of the national operator is to continue to deliver its component of the existing Triple Zero service. The national operator provides a significant benefit to the ESOs in managing the interface with the telecommunications providers.

The criteria for the functions of the national operator should be clearly linked to the required level and type of service, including any expansion in the level of service. Fundamentally, however, the primary criteria for the role of the Triple Zero service should be to provide a voice based emergency response capability consistent with the expectations of the community but at the same time recognise the inherent boundaries in the capability and clearly explain and define such boundaries. With this in mind, the Triple Zero service should:

- reflect world best practice in regards to provision of a voice service and grades of service;
- use appropriate technology whose value to the Triple Zero service is clear; and
- provide a free, timely and accessible service.

The Tasmanian Government notes the concern in the Issues Paper that the current Triple Zero service results in calls being double handled and the existence of a national system restricts the ability of emergency services to implement changes to their own systems. While technically correct, the issue of double handling of calls does not, based on the high level of satisfaction with the Triple Zero service, indicate that this is inconsistent with the expectations of the community who access the service. Further any issues are outweighed by the benefits of a common experience for callers, the resilience of the system and the low-risk provision of a single national number.

## **Question 6 The role of telecommunications providers**

**Telecommunication providers have regulatory obligations in relation to Triple Zero, recognising their importance in the delivery of the service. However, it is important to consider whether the regulatory framework remains appropriate given changes in technology and the telecommunications industry, the likely direction of the Triple Zero service and the Government's commitment to reduce the regulatory burden on industry.**

**Is the current regulatory and funding framework for the Triple Zero service appropriate now and for the future? If not, what changes should be made and why?**

The Issues Paper outlines the key responsibilities of the Triple Zero service provider and the current regulatory framework. Given the rapid advancements in technology and the increasing community expectations regarding the Triple Zero service, the current responsibilities and regulatory arrangements that were prepared when such advancements were in their infancy or not existent are arguably no longer appropriate. This supports the position stated previously that advancements in technology need to be continually identified and assessed for their suitability in a responsive manner.

### *6.1 Regulatory Framework*

The Tasmanian Government supports the principle of reducing the regulatory burden on business and industry. However any proposal for deregulation must consider the impact on end to end provision of the Triple Zero service.

The regulatory changes already made in relation to removing duplicate reporting arrangements under the *Telecommunications (Emergency Call Service) Determination 2009* are welcomed. However, the Issues Paper canvasses a number of possible enhancements to the service to meet community expectations in regards to service delivery. It may be that regulatory obligations would need to be increased to deliver such enhancements.

### *6.2 Assessing the Main Regulatory Requirements*

The Tasmanian Government notes that the main regulatory requirements in relation to the Triple Zero service are specified in the *Telecommunications (Emergency Call Service) Determination 2009*.

It is further noted that the Issues Paper provides information on two important issues that may reflect limitations in the current regulations that provide for the Triple Zero service. The two issues are the:

- high use of mobile phones compared to the standard telephone service to contact the Triple Zero service; and
- the high level of non-emergency, nuisance and malicious calls to the Triple Zero service.

In relation to the first issue, careful consideration needs to be given to whether the current regulatory requirements in relation to the provision of a standard telephone service to a person (that is the Universal Service Obligation) is consistent with what the expectations of the community in relation to how a standard telephone service is defined and, by extension, how this may impact on the ability of a person to contact the Triple Zero service.

In relation to the second issue, taking into account the high level of non-emergency calls to the Triple Zero service and the significant costs associated with the handling of such calls, it is arguable whether the regulatory requirement to minimise such calls is being met to the level that it should.

It is also noted that the challenges posed by the increase in VoIP may require additional regulation to ensure that the registered location for a VoIP service is related to the property address of the caller and not a default location, such as the location of a server.

### 6.3 *Funding Framework*

The Triple Zero service is funded through a combination of Australian Government and industry funding based on the net operating costs of providing the service capped at \$22 million. Approximately 66 per cent of the total costs of providing the Triple Zero service is funded by industry through the imposition of a levy on those organisations that report greater than \$25 million of revenue. Based on the total number of calls made to the Triple Zero service in 2012-13 of 8.9 million, the levy effectively represented \$1.30 per call. However, taking into account that 3.1 million of calls were classified as being non-emergency the actual levy for the 5.8 million calls that were transferred to an ESO was \$2.00 per call.

Given the increase in the take up of VoIP services, it is arguable whether the current threshold for the payment of the levy is appropriate. As the take up of VoIP increases, it is likely that issues of cross subsidisation will occur between customers of those companies with greater than \$25 million of revenue and smaller providers. Whether or not this is a significant issue is one for the Australian Government to consider.

It is important that any enhancement in the Triple Zero service gives appropriate consideration to the most effective, efficient and sustainable way to fund any enhancements and includes other key requirements that seek to address the challenges that have been identified in the Issues Paper such as reducing non-emergency calls to Triple Zero during significant events. Certainly, in circumstances where an expansion in service reduces the volume of calls to Triple Zero, this should be encouraged and supported by the funding arrangements.

To this end, any enhancements to the Triple Zero service being contemplated should not be limited to response related enhancements. Instead, arrangements that potentially reduce the potential impact on Triple Zero should also be considered essential to the ongoing viability of the service. For example, Emergency Alert has the potential to significantly reduce the demand on the Triple Zero service during significant events.

However, under current arrangements, the capability is maintained and funded primarily on a fee for service basis by jurisdictions. Some service providers elect, however, to not charge for messages sent to their customers. Similarly as this submission clearly demonstrates, the provision of jurisdictional general information lines is a proven way to address the issue of extreme demand being placed on the Triple Zero service during significant events.

The value of an alternative contact number is also demonstrated by the current Police Assistance Line number (131 444) that is provided to jurisdictions at no cost (other than those costs that are funded by governments directly such as staffing).

In circumstances where the provision of an alternative contact point for the community reduces demand on the Triple Zero service, effectively meeting a regulatory obligation placed on carriers through the Telecommunications (Emergency Call Service) Determination 2009, the funding arrangements should recognise this. For example, within the arrangements carriers could be required to provide such services to jurisdictions on a cost recovery basis only with no profit margin being added as recognition that it enhances the Triple Zero service capability. Similarly, carriers could also be required to maintain and fund Emergency Alert to recognise that the capability would assist them in meeting their regulatory obligations. This approach would ensure that the Triple Zero service continues to be effective in delivering on its key objective, that of being an emergency response capability.

## **Question 7 The role of innovators**

**Innovative ideas to improve emergency assistance may come from a range of parties such as app developers, device and car manufacturers, research organisations, community service providers and individuals.**

**What sorts of innovations would most improve the Triple Zero service? How can innovation and third party innovators be supported while ensuring the reliability and integrity of service?**

The Tasmanian Government supports innovations such as smart phone applications that are able to demonstrate how they enhance the Triple Zero service. Similarly, the State is of the view that the availability of such applications should be publicised by the national triple zero operator. Such innovation is essential to continue the development of the Triple Zero Service and allow it to keep pace with developments in mainstream communication channels, which will in turn maintain the relevance of the Triple Zero service to the community. However, it is important that the Triple Zero service manages community expectations of methods of access the Triple Zero service.

Regulation of innovators is essential. An appropriate regulatory regime would avoid the promotion of an innovation impacting on the clarity of public understanding and expectations of the Triple Zero service. This impact has already been seen in the smart phone app space, with a number of app developers promoting a product as an emergency contact app, without the support of the Triple Zero service providers.

Regulation is also essential to ensure that false expectations of access to the Triple Zero service are not being generated by other service providers, for example VoIP or satellite service providers. Generally, if a device can be used to make a call to a standard phone service, there would be an expectation that the device could call Triple Zero. In these circumstances there should be a requirement to provide access to the Triple Zero service.

## **Question 8 Cooperation and decision-making**

**There are a range of parties with interests and responsibilities in relation to Triple Zero. It is important that there are effective cooperation and decision-making arrangements in place amongst these parties so that the service can continue to adapt and respond to issues as they arise in the future.**

**What things do the current cooperation and decision-making arrangements for Triple Zero do well? What things do they not do well? What changes are needed so the service can better adapt and respond to issues in the future?**

The current cooperation and decision-making arrangements have contributed to the success of the Triple Zero service, and its ongoing development and response to issues as they arise. This is due in part to a considerable degree of cooperation between the various parties, in particular the national service provider and the ESO's, primarily through the NECWG. There are limitations on this arrangement, in that it relies significantly on the good will of the parties and the group has no official standing in Australia's emergency management governance framework.

The most appropriate ongoing governance arrangements for the Triple Zero service should reflect the need for all emergency services, policy makers and service providers to be engaged in discussions about the nature and extent of both the service itself and the other key elements of Australia's emergency communications capability. How this would be delivered would require further consideration. The Tasmanian Government, does, however, have a preference for existing forums to be allocated responsibility for the overall governance of such matters. This is distinct from the technical and other groups whose role is clearly defined and limited to consideration of specific issues.

## **Conclusion**

The Tasmanian Government considers that ongoing role of the Triple Zero service should be a voice based system that relies upon being available anywhere, anytime and free of charge to provide an emergency response capability. We do recognise, however, that there has been technological advancements made that could, if able to implemented, directly impact on the delivery of the Triple Zero service and would support the progression of initiatives that use such advancements provided that they are cost effective and can demonstrate their benefits



Tasmania considers that the current issues facing the Triple Zero service, particularly the limitations of the telecommunications network and the high level of non-emergency calls, should be addressed as part of the Review. It follows that implementing changes to the Triple Zero service without first considering the opportunities to address the fundamental issues currently facing the capability would likely see the exacerbation of such issues.