



Telecommunications
Industry
Ombudsman

TIO submission on the Triple Zero service outage

Message from the Ombudsman

The Telecommunications Industry Ombudsman (the TIO) offers information to assist the Environment and Communications Reference Committee's Inquiry into Triple Zero service outages.

Australians expect that in times of crisis, their telecommunications services will provide them with reliable access to emergency assistance through the Triple Zero service. The events of the Optus Triple Zero service outage on 18 September 2025 serve as a reminder of the crucial role these services play in ensuring public safety and the tragic consequences when things go wrong.

The TIO provides a fair, independent, and accessible external dispute resolution 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. Most TIO complaints are about service reliability, provider inaction or delays, or billing and credit management activities. Triple Zero-related complaints are rare, and mostly relate to concerns about coverage, reliability issues and corresponding potential difficulties accessing Triple Zero. We therefore consider the TIO to be peripheral to the Triple Zero ecosystem.

The TIO typically receives complaints after consumers have raised their concerns directly with their telecommunications providers, and after they have given these providers an opportunity to respond to their complaints. When we hear about service difficulties affecting access to Triple Zero, this typically occurs days or weeks after the event has occurred. This goes some way to explain why the events of 18 September 2025 only generated two complaints to the TIO, and both of these complaints related to the same incident.

To inform our submission, we manually reviewed complaints from 1 July 2024 to 31 October 2025 for any complaints that discuss Triple Zero or emergency services more broadly.

Our submission outlines:

- What the TIO heard from Optus consumers on the day of the outage
- What the TIO hears from consumers concerned about their access to Triple Zero generally
- What the TIO hears from regional and rural consumers about access to essential telecommunication services and Triple Zero
- Complaints about device blocking under the Emergency Call Service Determination, and
- Our role in the implementation of recommendations from the Review into the Optus outage of 8 November 2023 (the **Bean Review**), including Recommendation 2, the establishment of the Triple Zero Custodian.

I thank the Committee for considering our submission and we look forward to the Committee's final report.

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1 About the TIO

The TIO is the external dispute resolution service for the telecommunications industry. We provide a free, fair, and independent service to individual consumers, small businesses, not-for-profits and occupiers of property who have been unable to resolve their complaint with a phone or internet service provider. Telecommunications service providers (including carriers and eligible carriage service providers) are required to be members of our scheme and to fund our operations.

The TIO has jurisdiction to handle complaints about telephone and internet services, and our Terms of Reference¹ set out the types of complaint the TIO can and cannot handle, as well as how we handle them. The TIO also has the authority to make decisions that the Australian Communications and Media Authority (**ACMA**) has authority to enforce against TIO members. In exercising its powers, the TIO assesses what is fair and reasonable in the circumstances, having regard to the law, relevant industry codes, guidelines and good practice.

Most complaints at the TIO are resolved through our referral pathway, which involves us summarising the consumer's complaint, assessing whether it is in jurisdiction, and then referring it to the service provider or carrier for resolution. We require our members to contact consumers within 10 business days to resolve their complaint. If there is an urgent aspect of the complaint, we require our members to address the urgent issues within 2 business days. If the consumer tells us their complaint has not resolved after these timeframes have lapsed, we will assign the complaint to a dispute resolution officer who will then commence the conciliation or investigation of the complaint.

The TIO's complaint data provides unique and valuable insights into the issues experienced by telco consumers. As the TIO's referral pathway often involves only a single contact from the consumer before their complaint is resolved, we may have limited or unverified information about individual complaints unless those complaints advance to our dispute resolution teams for case management. However, our complaints database as a whole is a strong indication of emerging trends in the industry, and a good way to gauge consumer sentiment on issues they have experienced.

¹ TIO, [Terms of Reference](#), January 2025.

2 The Triple Zero service outage of 18 September 2025

2.1 Timeline of events

Thursday 18 September 2025

On 18 September 2025, we received two complaints directly related to the Optus Triple Zero service outage. Both complaints were linked to the same emergency event, which involved multiple callers trying and failing to call emergency services via Triple Zero on the Optus network during a medical emergency.

We received the first complaint to our Early Resolution contact centre at 11:40am.² This consumer said they were an Optus customer and they had been unable to call emergency services using their mobile service earlier that morning. They said this affected multiple people in their family at different locations, and so they believed there was a possible issue with the Optus network. The consumer said they had raised this with Optus, but they had not received a satisfactory explanation of what happened. We referred this complaint by email to Optus at 11:45am using our regular process.

We received the second complaint at 1:57pm. This consumer is a relative of the consumer mentioned above and discussed the same emergency situation as the first complaint. They again suggested there may have been a wider problem occurring with either the Optus network in the consumer's city or the Triple Zero service itself. We referred this complaint to Optus by email using our urgent referral process, which requires Optus to prioritise the complaint and resolve the urgent issues within two business days.

The TIO did not receive any outage notifications directly from Optus about the incident on 18 September 2025, nor did we receive any other correspondence from Optus on that day alerting us to a potentially-widespread issue with the Triple Zero service.

Friday 19 September 2025

On 19 September 2025, at 3:45pm, the ACMA spoke with the Ombudsman by telephone to alert us to the incident and advised that Optus would be holding a press conference later that day.

At 5:45pm, Optus formally announced that an outage had occurred via press conference. This televised announcement was the first time the TIO received confirmation from Optus that the Triple Zero service outage had occurred. While the initial complaints provided early indications of a

² All times in this submission refer to Australian Eastern Standard Time.

significant issue, the public confirmation from Optus allowed the TIO to better understand the scale and nature of the outage.

Shortly after the announcement, the TIO undertook a review of all possibly relevant complaints we received on 18 September 2025 and 19 September 2025. We identified the relevant complaints mentioned above. We also responded to media enquiries about those complaints at this time.

At 6:30pm, a senior employee from Optus called the Ombudsman to provide details about the outage. The Ombudsman informed the Optus representative about the two identified cases from the 18 September. The Optus employee said they would investigate these further.

At 8:00pm, the TIO published a statement on its website acknowledging the incident and extending our sympathies to the families affected by the outage.

Saturday 20 September 2025

At 12:20pm, the Ombudsman contacted the Department of Infrastructure, Transport, Regional Development, Sports and the Arts (the **Department**) to establish a point of contact for discussions about Triple Zero.

At 12:45pm, the Ombudsman had a second call with an Optus senior employee to discuss the event.

At 6.50pm, the Minister's office called the TIO to enquire about our approach to the incident and whether we were hearing from consumers who had been impacted.

Sunday 21 September 2025

At 5:00pm, the ACMA called the Ombudsman to discuss whether the TIO had identified any further complaints relating to the day of the outage.

At 8.20pm, the Ombudsman informed the ACMA we had identified no further complaints relating to the 18 September 2025 outage.

Monday 22 September 2025

At 9:30am, the TIO called Optus to establish a process of referring all current and ongoing complaints involving Triple Zero to senior complaint handling staff at Optus, in addition to the regular complaints referral process.

At 9:50am, the TIO emailed Optus to again share the case reference numbers for the two complaints we received on 18 September 2025, and to confirm we had identified no other relevant Triple Zero complaints in our queue.

At 1.40pm the TIO updated its website with information about the outage. This update was intended to notify customers of the situation, provide guidance on what steps they could take if affected, and reinforce the TIO's role as a source of assistance during telecommunications disruptions.

Subsequent activities

In the following weeks, the TIO monitored its complaints for any similar outages with Optus or other networks. Any complaints indicating possible problems with the Triple Zero service were directly escalated with senior complaint handling staff at the telecommunications providers in addition to our usual process. This process did not yield any additional complaints indicating widespread Triple Zero issues.

We have since completed a review of our complaints database between 1 July 2024 and 31 October 2025 to better understand the frequency of potential issues with Triple Zero services. We have summarised our insights in **section 3** of this submission.

2.2 Details of the complaints received about the outage

As described above, the TIO received two complaints on 18 September 2025 whose circumstances match the description of the Triple Zero outage shared by Optus. Both complaints related to the same medical emergency, in which multiple family members on the Optus network attempted to contact emergency services by dialling 000. However, all calls failed to connect. The consumers told us that they were ultimately able to seek medical assistance by finding someone on a different mobile network and asking them to place the call. Through their complaints, the consumers expected Optus to fix the service, and in one case, to provide new devices to the consumer.

We received confirmation that Optus resolved one of these complaints by agreeing to cancel the consumer's current plan without any termination fees applying, providing three new devices, and granting 12 months of free service.

The other complaint closed in late October 2025 on the basis that the consumer stopped engaging in the complaint.

Additionally, the TIO is aware of at least one other Optus customer who attempted to call 000 on 18 September 2025 and experienced difficulties communicating with emergency operators. This case may not be directly related to the Triple Zero service outage as the call was made in Victoria and the consumer experienced a poor quality connection with emergency services, rather than the total failure to connect described in the two complaints detailed above.

3 Other complaints about access to Triple Zero

3.1 The TIO receives complaints about Triple Zero, although outage information is limited

The TIO regularly receives complaints about Triple Zero services against a range of different telecommunications providers.

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.

One initiative that may help us identify Triple Zero outages are the notification requirements under the *Telecommunications (Customer Communications for Outages) Industry Standard 2024*. Since this Standard commenced on 31 December 2024, carriers must notify the specified stakeholders (including the TIO) when they have detected a major outage on their network. On 30 June 2025, these notification requirements were extended to include notifications of any significant local outages.

The TIO receives daily outage notifications from the relevant carriers, although it is very rare for these outage notifications to indicate issues that specifically relate to the Triple Zero service. Although carriers are currently not required to notify the TIO about whether these outages affect calls to Triple Zero, nor how many calls to Triple Zero failed during the outage, some carriers now do so. We have seen instances of carriers contacting us to describe in more detail how a specific outage may impact calls to Triple Zero, including timely updates, the number of services affected, and details of the welfare checks conducted for those consumers. For example, the TIO received multiple updates from TPG about an outage that disrupted calls to Triple Zero on 6 June 2025.

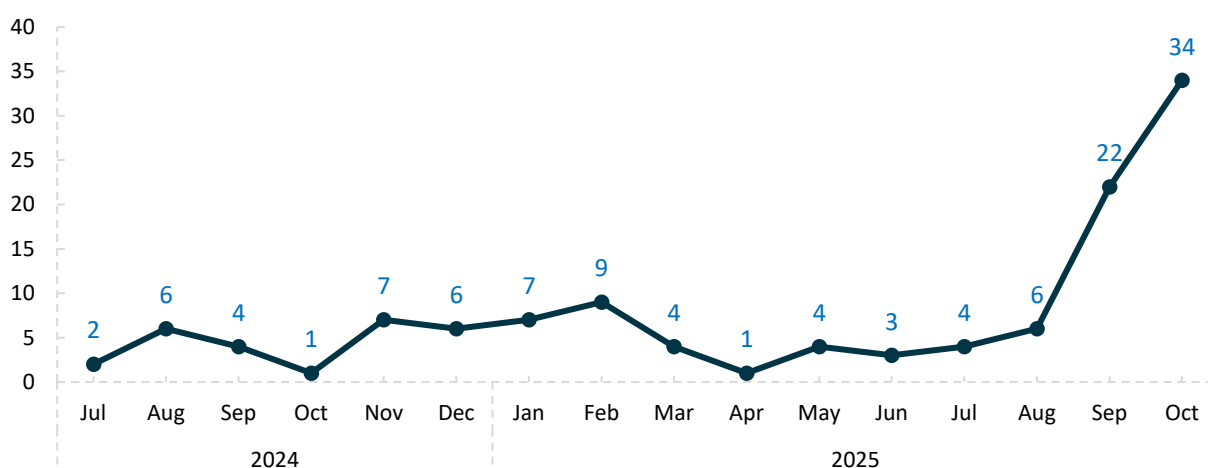
3.2 Complaints about failed calls to emergency services

The TIO has reviewed its recent complaints for consumers who have discussed issues affecting their calls to the Triple Zero emergency service.

Between 1 July 2024 and 31 October 2025, we identified 120 complaints³ from consumers who said they tried and failed to call emergency services via Triple Zero. This number includes the two complaints about the 18 September 2025 outage discussed in Section 2.2 of this submission.

These complaints related to calls made on one or more of all three of the major mobile network providers (Telstra, Optus and TPG/Vodafone). Consumers in these complaints were located in all states and territories except for the Northern Territory. While there was a steady number of these complaints throughout this period, the number of complaints increased significantly in September and October 2025 following the outage on the Optus network.

**Complaints reporting failed calls to Triple Zero
1 July 2024 to 31 October 2025**



This spike in complaints does not necessarily demonstrate an increase in network outages or failed calls to Triple Zero services since the outage on the Optus network. More than half of the relevant complaints since the outage described failed calls to Triple Zero that occurred in the weeks or months prior to 18 September 2025, or at unspecified times. It is also likely that media on the Optus outage encouraged consumers to make complaints about Triple Zero that may previously have gone unreported.

On the limited information we have about these complaints, many of these failed attempts to connect to Triple Zero services appear to have failed due to issues unrelated to network outages, such as pre-existing mobile reception issues at the consumer's location, possible handset faults, or ongoing landline problems. Given the nature of these complaints, we do not have sufficient information to conclude that most are likely to be linked to broader network outages affecting the Triple Zero service.

³ For the purposes of this submission, our complaints numbers have been developed through manual review and include both (i) complaints that the TIO referred to telco providers as part of our dispute resolution process, and (ii) a smaller number of enquiries to our office, often anonymous, which were not referred to the provider.

Our review found 12 of these 120 complaints could potentially indicate network issues accessing Triple Zero or issues with the Triple Zero service itself, although we have only linked three of these complaints to confirmed outages affecting access to Triple Zero (the two about the Optus outage on 18 September 2025 described in **Section 2.2** of this submission, and one complaint linked to the TPG outage of 6 June 2025 described in **Section 3.1** of this submission). These 12 complaints predominantly related to Optus mobile services, although complaints appeared for all three of the major mobile networks. They occurred across at least 5 different states or territories over a range of different dates.

In reviewing these 12 complaints, we considered whether the consumer described a situation where calls to Triple Zero failed but regular calls were connecting, or whether they said multiple consumers were affected at the same time. We are unable to confirm the exact cause of most of these outages, either because the complaints did not reach the investigation stage of our process, or because the complaint was resolved before the parties determined the reason the calls failed.

3.3 Other concerns about access to Triple Zero

In the period 1 July 2024 to 31 October 2025, the TIO also received at least 567 complaints from consumers who expressed concern that they may not be able to access the Triple Zero emergency service as needed.

Consumers who raised these concerns often either experienced some form of vulnerability themselves (such as having health or safety concerns), or they cared for someone who was vulnerable. Consumers described a range of different reasons why they believed they may be unable to call Triple Zero, including the following:

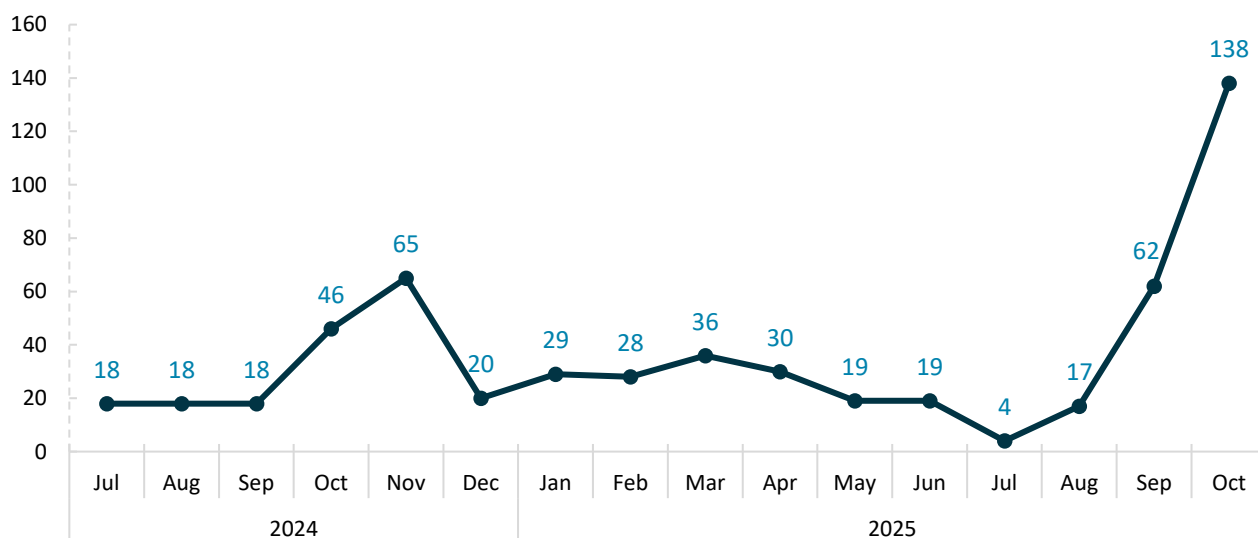
- Most commonly, consumers said they live in areas of poor mobile reception, and they were worried they would be unable to reliably connect to Triple Zero in the event of an emergency.
- Several consumers discussed how delays in connecting landline services or faults with those services may leave them isolated and without access to Triple Zero.
- In late 2024 and October 2025, groups of consumers also expressed concerns about how the blocking of their mobile devices under the *Telecommunications (Emergency Call Service) Determination 2019* would hinder their ability to call Triple Zero.

We discuss the regional aspects of these complaints in **Section 4** of our submission.

We discuss the Emergency Call Service Determination in **Section 5** of this submission.

Concerns about access to the emergency service spiked in October and November 2024, as the 3G network shutdown was completed, and again from September 2025 following the Triple Zero service outage.

**Complaints reporting concerns about access to Triple Zero
1 July 2024 to 31 October 2025**



Several consumers specifically referenced the Optus Triple Zero service outage as the main source of their concern about access to emergency services. In some cases, these were customers of Optus who were seeking reassurance that the problems have been resolved, or were seeking to exit their contracts so that they could move to another network. In other cases, customers on other mobile networks said they read about the outage and wanted confirmation from their service provider that they could call emergency services.

4 Concerns about access to emergency services in regional communities

Reliable mobile services are an important lifeline for many consumers living in regional, rural and remote Australia, and it is common for the TIO to receive complaints about the reliability of mobile coverage in these areas. We have previously discussed the prevalence and effects of mobile coverage in our submissions to the Regional Telecommunications Review,⁴ and to the Rural and Regional Affairs and Transport References Committee's inquiry into the 3G Shutdown,⁵ among other consultations.

When these consumers have medical conditions, safety concerns or other vulnerabilities, they are also likely to raise their concerns about potential inability to call Triple Zero in the event of an emergency.

We have identified at least 35 complaints from consumers between 1 July 2024 and 31 October 2025 who reported being unable to call Triple Zero when they needed to, specifically due to issues with mobile network reliability in regional, rural or remote Australia.⁶ In some of these cases, consumers described having to walk or drive some distance in order to make contact with emergency services. In the absence of other options, some consumers had to drive themselves or others directly to a hospital.

The TIO has consistently highlighted the risks of poor mobile coverage for these communities. Our public policy submissions have emphasised the need for targeted policy responses and infrastructure investment to address coverage gaps and to ensure that all Australians, regardless of location, have equitable access to essential telecommunications services.

The development of the Universal Outdoor Mobile Obligation may address many of the issues we have identified in our complaint handling work and submissions relating to regional Australia.

⁴ See, e.g., our submissions to the [2024 Regional Telecommunications Review](#), the [2021 Regional Telecommunications Review](#), and the [2018 Regional Telecommunications Review](#).

⁵ TIO, [Submission to the Rural and Regional Affairs and Transport References Committee inquiry into the shutdown of the 3G mobile network](#), May 2024.

⁶ For this submission, we have classified remoteness by postal area with reference to the [ABS Remoteness Areas](#).

5 Complaints about device blocking under the Emergency Call Service Determination

In April 2024, the government published the *Australian Government Response to the Bean Review Final Report* (the **Bean Review Response**).

In line with the Bean Review Response, the Minister directed the ACMA to make amendments to the *Telecommunications (Emergency Call Service) Determination 2019* (the **ECS Determination**) to improve reliability of access to the emergency all service. The first stage of these amendments requires carriage service providers to identify and cease supplying services to handsets that would be unable to access the emergency call service across all networks.

Since the amendments came into force on 28 October 2025, the TIO has received a steady stream of complaints about device blockings. We identified complaint spikes in two main periods:

- a) 1,229 complaints between 28 October 2024 to 31 January 2025, relating to the initial wave of device blocking following the amendments to the ECS Determination and the surrounding shutdown of the 3G network, and
- b) At least 80 complaints in October 2025, relating to a recent wave of device blockings following the identification of an incompatibility on some Samsung handsets.

We previously discussed the complaints in paragraph (a) above in additional comments to the 2024 Regional Telecommunications Review. At the time (just prior to the amendments to the ECS Determination being finalised), we reported seeing complaints from consumers who were concerned about the quality of their mobile service reducing following the 3G shutdown, who had received conflicting advice about whether they needed to replace their devices, who disagreed with their provider that their device would be incompatible, or who dismissed the messaging about device upgrades as a scam or an attempt to upsell services.

These complaints spiked once the Determination was in place, and a larger wave of devices were identified as needing to be blocked due to their inability to access the emergency service across all mobile networks. The change in messaging, combined with the range of different messaging offered by the major carriers around which devices would be blocked (and when they would be blocked), led to confusion or disagreement among some consumers about the urgent need to upgrade their handsets.

Once the Determination took effect, we received complaints about consumer handsets being blocked in situations where the consumer believed their devices would not be affected by the shutdown. We also received complaints from consumers who disagreed that their devices could not call Triple Zero, and who asked their provider to unblock their services. We handled these complaints on a case-by-case basis, with reference to factors such as whether the provider notified the consumer about the impending blocking of their handset, whether the provider had assured the consumer their handset would be fine, or whether there were related issues such as delays in receiving a replacement handset.

While we have continued to receive a low number of complaints about device blocking throughout 2025 (as consumers purchase handsets that may be incompatible, or bring them in from overseas), they have not been a strong focus for consumers until a wave of Samsung devices were identified as being unable to call Triple Zero in late 2025.

On 17 October 2025, the TIO contacted TPG after we identified complaints from consumers who were concerned about the imminent blocking of their Samsung mobile devices. These consumers had received notifications from TPG from September 2025, saying TPG had identified that their devices were unable to call Triple Zero and so the devices needed to be updated or replaced.

In response to our questions, TPG told us it had become aware of a small number of Samsung devices that were unable to call Triple Zero, and it had blocked an initial wave of 5,389 devices on 16 October 2025.

On 22 October 2025, Telstra announced it had identified a Samsung-related camp-on issue that would prevent calls from Telstra or Optus customers reaching Triple Zero via the TPG/Vodafone mobile network, and therefore those handsets needed to be blocked. It is unclear to us whether this is the same issue TPG acted on in September 2025.

During this process of identifying, notifying and blocking devices, we understand some telcos have offered affordable or free replacement devices to vulnerable or low-income consumers.

6 The TIO's involvement in Bean Review recommendations

6.1 The Triple Zero Custodian Steering Committee

In response to Recommendation 2 of the Bean Review⁷ calling for the establishment of a Triple Zero Custodian, the Government recommended that a steering committee be established to scope the role, functions and structure of the Custodian.⁸

The Bean Review Response stated that the Government was of a view that the TIO was appropriately placed to lead this work “...given its unique role as an independent body advocating for industry improvement and its familiarity with the needs of the community.”⁹ The Bean Review Response further stated that the TIO would be supported in this work by the Department.¹⁰

While the TIO is not an emergency body and has limited interaction with the Triple Zero ecosystem, we accepted the responsibility of chairing the Committee to support the important work in this area, and as our experience as an independent body in the telco sector meant we were well-placed to bring together different stakeholders across the Triple Zero ecosystem to develop a proposed Custodian model.

A Steering Committee was established to develop this Custodian, chaired by the Ombudsman and made up of representatives from the telecommunications industry, the Emergency Call Person, Emergency Service Organisations, the ACMA, the Australian Communications Consumer Action Network (**ACCAN**) and the Department. It met monthly between May 2024 and November 2024. In line with the Terms of Reference for the Committee (which was developed by the Department with feedback from the TIO) the *Triple Zero Custodian Steering Committee Final Report* (the **Final Report**) was delivered to the then Minister for Communications on 29 November 2024.

The Final Report represents the expertise and views from the Steering Committee on a preferred model for the Custodian, including its overarching objectives, functions, powers and governance arrangements. There was an overwhelming consensus from the Steering Committee on the need for the Custodian function to have end-to-end oversight of the Triple Zero ecosystem.

⁷ Department of Infrastructure, Transport, Regional Development, Communications and the Arts, *Review of the Optus Outage of 8 November 2025 – Final Report*, March 2024.

⁸ Department of Infrastructure, Transport, Regional Development, Communications and the Arts, [Australian Government Response to the Bean Review Final Report](#), April 2024, 4-5.

⁹ Ibid, 5.

¹⁰ Ibid.

On the 27 March 2025, the TIO received an email from the then Minister for Communication's office thanking the TIO for its work on the Final Report and confirming that the Minister had concluded that the most practical and effective way to establish the Custodian function would be within the Department.

On 30 June 2025, the Department met with the TIO to provide an update on the Triple Zero Custodian work. The TIO provided high level insights into the type of issues it sees from complaints about Triple Zero.

On 26 August 2025, the TIO received an email from Department confirming that, following consultation with key stakeholders, the Custodian function had been established within the Emergency Communications & Resilience Branch.

6.2 Compensation for mass outages

Recommendation 13 of the Bean Review called for an industry wide standardised approach to the form of resolutions available to consumers affected by a crisis or large-scale outage.

The Bean Review stated that:

This standardised approach should address the possible forms of compensation and penalties applicable to loss of service during outages, enabling the TIO to address mass events without requiring large numbers of individual complaints, investigations and resolutions. While it is not intended that this measure replace the Customer Service Guarantee (CSG), it could provide a similar framework through which outages affecting more than fixed line voice services are considered.¹¹

The Bean Review response accepted this recommendation and stated that the Department will work with the TIO, the ACCC and the ACMA and consult with industry on an approach to consumer recourse following a major outage.¹²

In 2024, the Department asked the TIO to progress TIO guidance on its approach to large-scale outage complaints. On 8 April 2025, the Ombudsman chaired a workshop with the TIO members who receive the highest volume of complaints to consult on the TIO's approach.

¹¹ Ibid, 11.

¹² Ibid.

We subsequently published a *Good Industry Practice Guide on Compensation* which came into effect on 1 July 2025. Our Good Industry Practice Guides give clarity to providers and the community about how we measure whether the industry is operating fairly. The TIO's Good Industry Practice Guides do not set out minimum legal obligations, instead they set out the practices we view as demonstrating fairness.

Our *Good Industry Practice Guide on Compensation* outlined our expectations on providers in relation to mass disruptions and outages, including the key questions that we ask members in handling complaints about compensation for mass outages.¹³

The key questions we will consider in the event of a mass outage event are:

1. Has there been a breach of relevant laws or codes, including the *Telecommunications (Consumer Complaints Handling) Industry Standard*?
2. What is the scale of the event?
3. What is the impact of the event?
4. Did the provider follow its own processes and procedures?
5. Did the provider offer appropriate and practical support to their consumers?
6. Does the proposed approach reflect community expectations of an appropriate response?
7. Has any complaint been handled in line with the requirements of the *Telecommunications (Consumer Complaints Handling) Industry Standard*?

The answers to these questions help us decide what is fair and reasonable in the individual circumstances of each complaint.

¹³ TIO, [Good Industry Practice Guides - Compensation](#), July 2025, 8–9.