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Submission to The Senate Environment and Communications References Committee

Inquiry into Triple Zero service outages

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Introduction

The Australian Mobile Telecommunications Association (AMTA) welcomes the opportunity to provide this submission in response to the Senate Environment and Communications References committee inquiry into the recent Optus Triple Zero outage.

About AMTA

The AMTA is the peak industry body of Australia's mobile telecommunications industry. Our purpose is to be the trusted voice of industry, promoting the adoption, monetisation and sustainability of mobile telecommunications technology for the benefit of all Australians.

AMTA members include the mobile network service providers, handset manufacturers, network equipment suppliers, retail outlets and other suppliers to the industry.

Executive Summary

The events of 18 September when a technical failure of the Optus network resulted in calls failing to connect to the Triple Zero service are tragic. As the peak mobile industry body, AMTA appreciates that lessons need to be learnt from this incident.

AMTA notes that Optus has indicated that it is assisting with inquiries undertaken by the committee and the ACMA as well as undertaking its own independent inquiry to help determine the circumstances of the network failure. Optus is best placed to assist on aspects of the terms of reference that are specific to the circumstances of the outage terms of reference.

However, AMTA supports continued collaboration between government and all parts of the Triple Zero eco-system to identify further opportunities to improve the resilience and reliability of Triple Zero services and build community trust in the system.

An area where AMTA believes further work would be useful is for the Department of Communications and the ACMA to engage with industry and device manufacturers to better understand the capability of different devices and software combinations in accessing Triple Zero services.

The Triple Zero arrangements

AMTA understands the important role that mobile networks play in connecting people to emergency services in times of need. The importance has grown over the past decade as people have become

more reliant on mobile devices and as the volume of calls to Triple Zero has increased. The National Emergency Communications Working Group (NECWG) has noted that calls to Triple Zero have increased by 44% over the past decade¹. NECWG notes that the increase is not only due to population growth but also the increased frequency of emergency events and natural disasters, growth of the range of connected devices accessing Triple Zero, and an increased reliance on mobile handsets that provide greater opportunities for people to connect.

Recognising the importance of the telecommunication sector's role in supporting Triple Zero, it is subject to extensive regulation. The Telecommunications Act 1997 and the Telecommunications (Consumer Protection and Service Standards) Act 1999 (the TCPSS Act) set out key aspects of the legal framework. These are supported by a multitude of other regulatory instruments and codes, which set out various obligations and expectations on carriers and carriage service providers.

Mobile networks are not infallible; they are subject to outages that can arise from a range of causes many of which are outside the control of a Mobile Network Operator (MNO). Mobile phones include a "camp-on" feature to offer backup for emergency call access to customers. If a call to Triple Zero cannot connect through the customer's home network, the mobile handset automatically searches for an alternate network and connects to a network that is available to carry the call. The camp-on feature should be supported by any handset even if that handset isn't associated with a mobile service. There will be occasions when no networks are available, such as widespread power outages or where no network has coverage, and in those circumstances mobile calls cannot connect to Triple Zero.

The regulations anticipate that there will be occasions when calls to Triple Zero do not connect and for that reason the welfare check process was established. These rules were developed by the ACMA and came into force in 2019. They require MNOs to undertake a welfare check on people who have tried and failed to call Triple Zero during a large network outage. AMTA understands that Optus undertook such welfare checks once it had identified the failure of calls to connect to Triple Zero.

Following a number of well publicised outages the regulatory arrangements that apply to Carriers have been strengthened. This includes recent changes recommended by the Bean review following the Optus network outage in 2023. AMTA understands that the mobile carriers have embraced these changes and have been working through Australian Telecommunications Alliance (ATA) to update relevant industry codes and practices.

However, it is important to note that the MNOs are but one part of a complex eco-system that supports the Triple Zero system. It also includes the Emergency Call Person (contracted to Telstra²), and the relevant Emergency Service Organisations in each State and Territory. International standards bodies, device manufacturers and network vendors also have a role to play. Overseeing the system is the Department of Communications and the ACMA.

The effective functioning of the system relies on many organisations to play their role in a coordinated and seamless way. It has been recognised by bodies such as the NECWG³, that the Triple Zero system is complex and is inherently reliant on awareness, collaboration, and interoperability between the various organisations involved. One of the key challenges NECWG had identified is the absence of overarching leadership, although this should be addressed with the

¹ NECWG - Emergency Communications in Australia, June 2025

² Telstra is the Emergency Call Person for 000 and 112; Concentrix Services Pty Ltd is the Emergency Call Person for 106, a text-based emergency relay service for people with hearing or speech impairments.

³ NECWG - Emergency Communications in Australia, June 2025

recent establishment of the Triple Zero Custodian and the stronger oversight powers that were passed by the Parliament in October 2025.

Notwithstanding these recent changes, AMTA supports continued collaboration between government and all parts of the Triple Zero eco-system to identify further opportunities to improve the resilience and reliability of Triple Zero services.

AMTA considers there is scope for a more proactive approach that provides assurance to customers on the capability of handsets to meet Australian requirements for emergency calling. There is currently no central registry of devices that are compliant with Australian standards, including in relation to calling Triple Zero. However, a consumer device sold in Australia must display the Regulatory Compliance Mark (RCM), and to utilise the RCM the device manufacturer is required to have signed a declaration of conformity that the device meets Australian standards. The ACMA should require that these declarations of conformity be submitted and registered. Current regulations place the onus on mobile operators to identify device issues and alert customers, before blocking the device should the customer not take action. This is intrinsically a backward-looking process, which relies on mobile operators identifying failed calls.

Further work is required to understand the capability of different devices and software combinations to access Triple Zero services, both directly and when the camp-on process is triggered. Whilst the industry is working with the government, the regulator and academia on new arrangements for device testing, recent issues have emerged about the different capabilities of handsets and we commend the work being undertaken by the Australian Telecommunications Alliance (ATA) in this area.

A further area for consideration is whether there is a need for improving public awareness about some of the factors that can impact Triple Zero calling. This could include information about devices, the availability of Wi-Fi as an alternative and the fact that camp-on calls take longer than a regular mobile call to connect.

Roaming

AMTA notes that the Terms of Reference for the committee specifically seek comments on domestic mobile roaming, particularly in circumstances of an emergency.

As noted previously, the current camp-on arrangements are a form of roaming in so far as they enable a customer to connect to an alternate network for the purpose of making an emergency call if their host network is unavailable. It is not clear whether broader call roaming arrangements would have resulted in a different outcome in the circumstances of the Optus outage since it appears that only calls to Triple Zero were impacted.

AMTA notes that Temporary Disaster Roaming (TDR) is being progressed, with controlled testing in a production environment scheduled to commence shortly. TDR will enable mobile users to connect to another carrier's network during a declared disaster or emergency in a limited geographic area, ensuring continuity of voice and text services when their home network is unavailable. It is designed to support basic communications for Australians in disaster-affected regions without degrading service for the host network. Again, it is not known if this solution could have assisted given the specific circumstances of the Optus outage.

