



5 December 2025

**Submission to the Senate Standing Committee on Environment and Communications – Triple Zero service outage**

1. **Introduction**

Samsung Electronics Australia Pty Ltd (**Samsung**) appreciates the opportunity to assist the Environment and Communications References Committee's inquiry into the Triple Zero service outage. We recognise the critical importance of preserving reliable access to the emergency call service for all Australians and acknowledge the Committee's focus on recent events affecting Triple Zero connectivity.

Samsung is committed to ensuring its devices comply with all applicable Australian laws and regulations. All devices sold by Samsung in Australia have been, and continue to be, compliant with all applicable Australian laws and regulations with respect to their ability to connect to the emergency call service. In addition to its obligations at the time of supply, Samsung has made available, and continues to make available to end users, various software updates post supply to support its devices. We acknowledge the importance of connectivity to the emergency call service, and consumer experience in using these devices.

Samsung has been working closely with mobile network operators (**MNOs**) to ensure that they have the information they need to meet their own statutory obligations relating to connectivity to the emergency call service. Samsung is committed to continuing to take steps to ensure that users are aware of the need to update their devices, or where necessary, replace their end-of-life devices to ensure ongoing access to the emergency call service.

This submission discusses technical and regulatory matters regarding emergency call service connectivity (including emergency calling from older Samsung devices) and proposes improvements to strengthen the Triple Zero ecosystem.

2. **Executive summary**

Samsung reaffirms its commitment to ensuring that supported devices are able to consistently and reliably call Triple Zero. Where changes in the MNO's networks mean emergency call service connectivity is no longer possible for legacy devices, Samsung is committed to working with MNOs and government stakeholders to ensure that customers are aware of the issue, so that they may migrate to a supported device.

Recently reported issues, where older devices from various manufacturers (including Samsung) have been unable to connect to Triple Zero on the Vodafone network in certain scenarios, stem from network capabilities at the time those devices were introduced to the market, and the transition steps taken by

the industry in response to the closure of 3G networks, rather than a failure by handset manufacturers to meet applicable technical and regulatory standards.

Suppliers of mobile devices like Samsung are required to comply with various requirements under the telecommunications regulatory regime, to ensure that devices supplied in Australia are tested for conformity with Australian standards and appropriately labelled, and to maintain declarations of conformity. Suppliers are required to test and declare compliance before supplying those devices to the market. Samsung takes this obligation seriously and ensures that all devices are fully compliant with the telecommunications regulatory requirements prior to supply. However, the operation and configuration of networks, including access to Triple Zero, fall within the responsibility of MNOs. MNOs have to ensure that Triple Zero calls originating from compliant devices are successfully connected to emergency services, and that any modifications to their networks do not compromise a device's ability to access Triple Zero.

Samsung has worked closely with MNOs as they upgrade their networks to support continued emergency calling capability. Where required, it has provided technical information to assist carriers with identifying affected customers on legacy devices that were unable to make emergency calls on the 4G network, well in advance of the closure of the 3G network.

### **Recommended actions**

With the view to strengthening the Triple Zero ecosystem, Samsung supports:

1. **Recommendation 1** – a single unified register of devices (including declarations of conformity and related test records) to ensure transparency and coordination across key stakeholders;
2. **Recommendation 2** – consideration of ways in which the lawful exchange of technical information between MNOs regarding device behaviours on their respective networks, to ensure that all MNOs have consistent visibility of device behaviour issues; and
3. **Recommendation 3** – alignment of emergency and non-emergency calling functionality (such that any device capable of making non-emergency calls on a network must also be capable of making emergency calls on the same network).

Samsung welcomes the opportunity to continue to consult on these important matters and to assist the Committee with its important work.

### 3. **Regulatory framework**

Under the *Telecommunications (Labelling Notice for Customer Equipment and Customer Cabling) (Labelling Notice)* regime and *AS/CA S042.1 (Requirements for connection to an air interface of a Telecommunications Network)* standard (**S042 Standard**), among other requirements, device suppliers are responsible for ensuring that their devices comply with relevant standards, as reflected in the declaration of conformity completed prior to supply. Samsung complies with all applicable standards in force at the time of import.

Relevantly, earlier versions of the S042 Standard in effect prior to 6 December 2018 did not provision for VoLTE emergency calling (emergency calls over the 4G network), meaning that 4G calling (both non-emergency and emergency calling) was not required under the S042 Standard applicable at the time these legacy devices were manufactured and supplied.

Once compliant devices are supplied to the market, MNOs are responsible for network provisioning and emergency call carriage. Relevantly, the *Telecommunications (Emergency Call Services) Determination 2019* (as amended in late 2024) (**ECS Determination**) places obligations on MNOs in respect of notifying customers and blocking devices that cannot access Triple Zero (particularly relevant after the 3G shut-down).

#### 4. **3G network closure and device behaviour**

Where a device's primary mobile network is unavailable due to lack of coverage, it is designed to automatically connect to another available mobile network to place a Triple Zero call – this is known as 'camping-on'.

##### Devices on the Vodafone network

The shut-down of the 3G networks in Australia impacted a subset of older Samsung devices that were operating on the Vodafone network.<sup>1</sup> Those devices could no longer access any 3G network and were unable to use the Vodafone 4G network to facilitate VoLTE emergency calling when connected to the Vodafone network.<sup>2</sup> In contrast, in circumstances where Vodafone coverage was unavailable, devices used by Vodafone customers could still 'camp on' to another available 4G network (i.e., Telstra or Optus) to make emergency calls.

Samsung and Vodafone worked together to address this behaviour in 2021, with updates for eligible devices (as described below). However the behaviour can still arise where customers have not applied these critical updates to their devices. Where a device is unable to access Triple Zero, Samsung understands that the ECS Determination requires the MNO to identify and notify affected customers and block the device from its network.

The impact of the shut-down of the 3G network on emergency calling is not an issue unique to Samsung devices. Samsung understands that devices from other manufacturers on the Vodafone network are also impacted in different ways that result in limited connectivity to the emergency call service in certain circumstances.<sup>3</sup>

---

<sup>1</sup> Older devices were only impacted if they did not have the 'VoLTE Emergency Calling' update applied. Further details, including in respect of the availability of this update, are set out in the following paragraphs.

<sup>2</sup> Vodafone shut down 3G services from January 2024, and Optus and Telstra shut down their 3G services from 28 October 2024.

<sup>3</sup> Vodafone, *Update on calling emergency services* <<https://www.vodafone.com.au/triple-zero-update>>.

### Devices from other networks 'camping on' to the Vodafone network

For completeness, we are also aware of instances of older Samsung devices operating on the Telstra or Optus network that are unable to 'camp on' to the Vodafone network to access Triple Zero.<sup>4</sup> This occurs on the rare occasion that both the Optus and Telstra networks are unavailable (due to no coverage), and Vodafone 4G network is the only available network.

This behaviour is also addressed through the same updates to eligible devices that were released in 2021 (as discussed above), but remains reliant on the individual updating their device.

### Technical details regarding VoLTE emergency calling updates

Samsung is reliant on instructions from the relevant MNO as to the way in which the respective networks facilitate emergency calling connectivity. Devices are not 'hard coded' to a specific network or frequency – instead, they are configured to work with the then-current network configuration of the relevant MNO (as tested by both Samsung and the relevant MNO prior to any such update being released). When the MNO requests Samsung's assistance to enable a network feature, such as VoLTE emergency calling, Samsung collaborates with that MNO to test and release updates to ensure that the feature is implemented in accordance with the MNO's requirements and applicable standards.

In June and July 2021, Samsung collaborated with Vodafone to release updates enabling support for VoLTE emergency calling that had been enabled on the Vodafone network, including for devices released prior to the network change.<sup>5</sup> Samsung updated as many devices as possible to support VoLTE emergency calling on the Vodafone network,<sup>6</sup> a matter that was notified to the ACMA at the time and communicated to Vodafone. Older devices (released prior to 2017) could not readily be updated by Samsung. This is because, amongst other things, those legacy devices were no longer in active support and it was impracticable to update and maintain the firmware of end-of-life devices, in some cases leading to potential functionality or product safety issues.

Samsung worked with Vodafone to update devices launched since 2017 to enable 4G emergency calls for those devices on Vodafone's network (noting that one 2017 device was unable to be updated). Where possible, Samsung used best efforts to update older devices to the extent these devices were practically able to be updated, acknowledging the difficulties in maintaining end-of-life devices, including unavailability of test devices.

From 2021 onwards, Samsung engaged with Vodafone when requested to assist with identifying legacy devices which could not readily be updated, and provided necessary information to support Vodafone

---

<sup>4</sup> Telstra, *Keeping you safe: an issue with some older mobile devices calling Triple Zero* <<https://www.telstra.com.au/exchange/older-mobile-devices-calling-triple-zero>> (22 October 2025); Optus, *Customer update: Triple Zero and Samsung Devices* <<https://www.optus.com.au/about/media-centre/media-releases/2025/10/customer-update-triple-zero-and-samsung-devices>> (22 October 2025).

<sup>5</sup> VoLTE emergency calling was made available by a network change from Vodafone that occurred progressively across the country, between 16 June 2021 to 4 July 2021. VoLTE emergency calling support was rolled out after the network change.

<sup>6</sup> References to Vodafone Hutchison Australia Pty Limited (**Vodafone**) are deemed to include TPG Telecom Limited (**TPG**) following the 13 July 2020 merger. For simplicity, Samsung has adopted this approach to align with the network name used during the majority of the relevant period.

with identifying relevant customers and other matters relevant to Vodafone's compliance with its regulatory obligations, including in respect of the shut-down of the Vodafone 3G network.

Samsung continues to provide technical support to MNOs to help ensure that, where a software update is available, eligible devices receive that update, and where no update is available, end-of-life models are identified for replacement (if required).

Regardless of the complexity of the network environment in which its devices operate, all devices sold by Samsung in Australia have been, and continue to be, compliant with all applicable Australian laws and regulations with respect to their ability to connect to the emergency call service. However, there are still opportunities for improvement in the regulatory settings, which we explore below.

## 5. **Recommendations**

Based on Samsung's experience, we make the following recommendations for the Committee.

### 5.1 **Recommendation 1 – A single authoritative register of compliant devices.**

Samsung supports the development of a public register of devices supplied into the Australian market (with supplier declarations of conformity and associated endorsed test reports).

This would provide a transparent, authoritative source of device compliance information and improve consistency in MNO identification of unsupported devices.

### 5.2 **Recommendation 2 – Information exchange on device behaviour**

Samsung suggests implementing a greater level of information exchange across the industry, to allow MNOs to share technical information about device behaviours to promote safety and connectivity.

Samsung supports engagement by the Australian Telecommunications Alliance (ATA) on updates to the Device End-to-End Service Testing (DETEST) Group's *Terms of Reference* to include the sharing of technical information between MNOs regarding identified issues in mobile device behaviour.

In the past, Samsung understands that concerns regarding restrictions on information sharing may have contributed to more limited information being shared.<sup>7</sup> We also understand that the ATA has recently written to the ACCC to confirm that the information proposed to be shared between operators will be entirely technical in nature, and will not include any commercial or competitive information. It is the ATA's assessment that this sharing of technical information does not give rise to any competition issues, and therefore does not require authorisation or exemption from competition rules. Samsung welcomes this new development and encourages information sharing to ensure that all MNOs have consistent visibility of device behaviour issues.

### 5.3 **Recommendation 3 – Alignment of non-emergency and emergency calling on future networks.**

Samsung encourages industry alignment on enabling both emergency calling and non-emergency calling on a network at the same time, when new network voice capabilities are introduced, to avoid dependency on older technologies for emergency calling.

---

<sup>7</sup> For example, concerns regarding anti-competitive conduct under the *Competition and Consumer Act 2010* (Cth), or privacy restrictions under the *Privacy Act 1988* (Cth) and *Telecommunications Act 1997* (Cth).

This will become relevant for future network changes, for example in relation to the 5G network. Samsung's commercial practice is aligned with this direction, and we will continue to work cooperatively with MNOs as they plan future voice service transitions.

## 6. **Conclusion**

Samsung remains committed to supporting the integrity and resilience of Australia's Emergency Call Service.

In the period leading up to and following the 3G network shut-down, Samsung has worked with MNOs to identify impacted devices, and where possible, updates were released in 2021 for eligible older devices to enable 4G emergency calling on the Vodafone network.

Samsung acknowledges that, in certain cases, older devices that have not been blocked or updated and remain in use, are still unable to access the emergency call service following the 3G network shut down. Samsung acknowledges the need for reliable emergency call service connectivity in all circumstances, and supports the strengthened regulatory approach through amendments to the ECS Determination and the registration of the new C674:2025 testing code.

Looking forward, Samsung supports practical transparency and coordination measures to strengthen the emergency call service ecosystem. We consider that the steps mentioned in section 5 above will meaningfully improve consumers' access to Triple Zero and support MNOs in meeting their obligations under the ECS Determination.

Samsung would be pleased to provide further technical detail or to appear before the Committee to assist with any questions.