

**Senate Environment and Communications References Committee
Inquiry into the Triple Zero service outage**

Questions on notice – Australian Telecommunications Alliance

Question:

Samsung provided the carriers and the regulator with information in 2023 about 71 mobile devices—10 of which are not capable of being upgraded, 61 of which are capable of being upgraded. The carriers did not “blacklist” (block) those devices immediately as the carriers were not identifying which customers had carried out the available software upgrade. Can you confirm that the carriers weren’t implementing the appropriate methodology insofar as their responsibility to identify devices which had and had not been upgraded?

Answer:

The *Telecommunications (Emergency Call Service) Determination 2019* (“ECSD”)¹ was amended by the Australian Communications and Media Authority (“ACMA”) in October 2024 to require Mobile Network Operators (“MNOs”) to inform customers about devices that are unable to make emergency calls, and to block those devices from connecting to mobile networks.² The ATA has explained this change in regulatory arrangements in more detail in its submission.³

The identification and blocking requirements commenced from 28 October 2024.⁴

The ATA further set out in Appendix 2 of its submission how customer equipment compliance is managed in Australia under technical regulations which apply to the suppliers of mobile phone handsets, one of which is Samsung.

For the period until the commencement of the new blocking obligations on 28 October 2024, the relevant provisions which applied to MNOs were contained in Part 2 of the ECSD. This meant the key obligations for MNOs until 28 October 2024 focused on the provision of access to emergency call services i.e. (in the context of Triple Zero):

- to ensure their controlled networks and controlled facilities give an end-user access to emergency call services (section 14);

¹ Available at: <https://www.legislation.gov.au/F2019L01509/latest/text>.

² See the new Part 4 inserted by the *Telecommunications (Emergency Call Service) Amendment Determination 2024 (No. 1)*, available at: <https://www.legislation.gov.au/F2024L01353/asmade/text>.

³ Australian Telecommunications Alliance, *Submission re: Inquiry into Triple Zero Outage*, 25 November 2025.

⁴ Section 2, *Telecommunications (Emergency Call Service) Amendment Determination 2024 (No. 1)*.

Senate Environment and Communications References Committee Inquiry into the Triple Zero service outage

- (where the MNO supplies an emergency telephone service) to give end users access to the emergency call service operated by the Emergency Call Person for Triple Zero (section 15); and
- to ensure that an emergency call made using their emergency telephone service is carried to the relevant termination point for the call either on or off net (section 19).

The MNOs did not have any entitlement under the ECSD to block mobile devices prior to 28 October 2024. However, the MNOs did work intensively with mobile device suppliers in the period prior to 28 October 2024 to determine which mobile devices would no longer be able to access Triple Zero once their 3G networks were shut down. This inability to access Triple Zero would be due to a variety of reasons, for example if a mobile device did not have any 4G/5G capability or, even if it did, if it was nonetheless configured to carry calls to emergency service numbers only using the 3G network.

The starting point for the MNOs in their analysis in the period prior to 28 October 2024 was the information about configuration which the mobile device vendors provided. The MNOs then conducted extensive examination of mobile device behaviour in records of calls by their own customers to Triple Zero, to verify the vendor-supplied information.

In the period until the shutdown of the remaining 3G networks (i.e. until 28 October 2024), the MNOs all consistently tested devices which they sold to ensure that the devices were correctly configured to access Triple Zero on their own networks, in compliance with the then-applicable ECSD obligation. The ATA has noted in its submission to the Committee that MNOs also undertake voluntary testing of devices they sell (beyond the applicable regulatory requirements) to provide additional assurance about the emergency calling capability of those devices.

There is no known specific difference in methodology or other approach which may have been taken by the MNOs in the testing of mobile devices they were supplying, which would have conferred on any MNO the entitlement to block a mobile device prior to 28 October 2024. Further, it is not the usual practice of mobile device vendors to nominate specific methodologies to be used by MNOs for testing or determining the capability of a device.

We should also note that the testing carried out by MNOs in respect of devices they supply is based on international standards which ensure global compatibility, such as those determined by 3GPP.⁵ These international standards in turn are reflected in Australian Standards such as AS/CA S042.1, which the ATA has described in detail in its submission.

⁵ 3rd Generation Partnership Project, <https://www.3gpp.org/>.

**Senate Environment and Communications References Committee
Inquiry into the Triple Zero service outage**

Questions on notice – Australian Telecommunications Alliance

Questions on Notice from Senator David Pocock

1. Does anyone within your organisation currently hold a sponsored pass to Parliament House?
2. If so, who, and which Member of Parliament sponsors that pass?

Answer:

1. Yes.
2. The ATA has one employee who holds an active sponsored pass – the Chief Executive Officer. The ATA understands that the Department of Parliamentary Services does not publish information on pass sponsors due to privacy, parliamentary privilege and security considerations.