Australian Telecommunications Alliance

Setting The Standard.
Driving Progress.

AUSTRALIAN TELECOMMUNICATIONS ALLIANCE SUBMISSION

To: Senate Standing Committees on Environment and Communications

Re: Inquiry into Triple Zero service outage

25 November 2025

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TABLE OF CONTENTS

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1. AUSTRALIAN TELECOMMUNICATIONS ALLIANCE

The Australian Telecommunications Alliance (ATA) is the peak body of the Australian telecommunications industry. We are the trusted voice at the intersection of industry, government, regulators, and consumers. Through collaboration and leadership, we shape initiatives that grow the Australian telecommunications industry, enhance connectivity for all Australians, and foster the highest standards of business behaviour. For more details, visit www.austelco.org.au.

For questions on this submission, please contact CEO Luke Coleman,

2. INTRODUCTION

2.1 The ATA welcomes the opportunity to provide a submission to the Senate Standing Committee on Environment and Communications inquiry into the Triple Zero service outage.

2.2 The ATA is recognised under Part 6 of the *Telecommunications Act 1997* (Act) as a body responsible for the development of industry codes. The ATA is also recognised under Part 21 of the Act as an approved Standards Development Organisation accredited by Standards Australia to make technical standards. These codes and technical standards are registered with, and enforced by, the Australian Communications and Media Authority (ACMA).

2.3 This submission will focus on the ATA's work in response to the *Review into the Optus outage of 8 November 2023* (Bean Review), which asked the ATA to address Recommendations 3, 4, and 16 of that review (see Appendix 1).

2.4 The 2023 outage and the response to the Bean Review provide a useful introduction to the Optus Triple Zero service outage of 18 September 2025. These two events both demonstrated the complex ecosystem of networks and devices operating under a range of different regulatory and standards requirements that make up the broader Triple Zero ecosystem.

2.5 Triple Zero operates in a vastly different environment to which it was first introduced in 1961. Triple Zero was established when Australia had a single fixed-line network operator, which was also the sole authorised provider of home telephones – the Postmaster General's Department, later Telecom Australia. Contrast this with 2025, where Australians have access to three competitive 4G/5G mobile voice and data networks, and a competitive market offering thousands of different mobile devices from a global marketplace, which also includes a growing range of mobile devices that can connect to Triple Zero via satellite networks (at this stage only for texts with voice capability to follow in the near future) and over Voice over Wi-Fi (VoWiFi) networks.

2.6 Mobile Network Operators (MNOs) and device standards for equipment suppliers (i.e. mobile phone providers) are subject to a range of regulatory obligations that are designed to ensure Australians are able to call Triple Zero, even when they are unable to connect to their usual (home) network provider.

2.7 When a home network is unavailable, a device operates in 'limited service state' (typically displaying 'SOS' or 'Emergency calls only' on the screen where the home network provider would usually be displayed). In limited service state the device attempts to connect to any other available mobile network in a process known as 'camp-on'. The technical standards used by mobile devices

to enable camp-on are based in global standards developed by the 3GPP.[1] In addition, devices sold in the Australian market are also required to meet Australian standards, as will be described in this submission.

2.8 The events of November 2023, the subsequent Bean Review, and the more recent Triple Zero issues in the spring of 2025 have acted as a reminder of the complexities in this ecosystem. While MNOs have responsibility for the behaviour of their networks (from both a technical and regulatory/compliance perspective), MNOs do not control the behaviour of devices, particularly when these devices attempt to camp-on to alternative networks during an outage.

2.9 In this submission, the ATA will outline the various regulatory and technical standards that govern the behaviour of networks and devices when a user attempts to call Triple Zero, and offer recommendations for how this regulatory framework could be strengthened.

2.10 Mobile network operators recommend the establishment and maintenance of a public register of devices by an appropriate government agency, to provide visibility for consumers, industry, and regulators regarding compliance with existing regulatory and testing requirements.

3. THE ATA'S RESPONSE TO THE BEAN REVIEW

3.1 Following the government's response to the Bean Review, on 24 May 2024 the Chair of the ACMA wrote to the ATA (then known as Communications Alliance) requesting the organisation develop codes to address Recommendations 3, 4, and 16 (see appendix for full recommendations and government response). In summary:

a) Recommendation 3 called for an industry code to implement six-monthly end-to-end testing of all aspects of the Triple Zero ecosystem.

b) Recommendation 4 stated that 'Bring Your Own Device' (BYOD) customers should be warned that those devices may not have been tested for emergency calls (to be addressed in conjunction with recommendation 3).

c) Recommendation 16 called for an industry code to enable remote access to network management tools.

3.2 To respond to Recommendations 3 and 4, the ATA tasked three working committees (WC)/groups to address various aspects of the ACMA's request:

a) *Working Committee 125: Emergency Calling – Network and Mobile Phone Testing*, responsible for the development of an industry code to formalise network and device testing arrangements;

b) *Working Committee 107: PMTS and Satellite Service Customer Equipment Standards*, an existing working committee charged with revising the Australian Standard for mobile devices connecting to mobile network in the Australian market (*AS/CA S042:2022 Requirements for Connection to an air interface of a Telecommunications Network*); and

c) The *Device End-to-End Service Testing Working Group* (DETEST) to develop industry technical

[1] For example, 3GPP Technical Standard TS 22.101.

guidance and share technical information in relation to device testing to facilitate the end-to-end testing performed via:

i. the Controlled Test Facility (University of Technology Sydney (UTS) National Telecom Resilience Centre); and

ii. device testing performed by MNOs,

for the technical operational arrangements of the Emergency Call Service and the National Messaging System.

3.3 To respond to Recommendation 16, the ATA established *Working Committee 123: Network Management for Emergency Calls*.

3.4 The output of these groups is described in greater detail below.

4. CODE C674 EMERGENCY CALLING – NETWORK AND MOBILE PHONE TESTING

4.1 WC 125 developed industry code *C674: Emergency Calling - Network and Mobile Phone Testing*, which requires operators to test network equipment – including elements of the Emergency Call Service – in an independent Controlled Test Facility.

4.2 Members of WC 125 included Telstra, Optus, TPG Telecom, Aussie Broadband, Apple, Samsung, and IoTAS, and, as observers, nbn, the ACMA, the Department of Infrastructure, Transport, Regional Development, Communications, Sports and the Arts (DITRDCSA).

4.3 During the development of the code, DITRDCSA entered into a contract with UTS (now operating the National Telecom Resilience Centre) to develop network testing arrangements. On 14 November 2024, the UTS National Telecom Resilience Centre provided the ATA with its proposed testing requirements, enabling WC 125 to commence drafting the code.

4.4 The code includes obligations on carriers to test network equipment with a Controlled Test Facility, i.e. the National Telecom Resilience Centre under the DITRDCSA contract. The three major MNOs and the ATA are members of the National Telecom Resilience Centre Governance Board. The ATA understands that the National Telecom Resilience Centre will test between 10-20 different mobile devices per year.

4.5 There is no expectation that the National Telecom Resilience Centre will test every handset present in the Australian market, including 'grey market' devices which may have been purchased from international sellers online or brought into Australia from overseas.

4.6 The code was submitted to the ACMA on 1 September 2025 and registered on 16 October 2025. Upon registration, the code became enforceable by the AMCA.

5. WC 107: PMTS AND SATELLITE SERVICE CUSTOMER EQUIPMENT STANDARDS

5.1 On 4 March 2025, WC 107 commenced consultation on changes to the Australian Standard (AS) for mobile devices to ensure they meet technical requirements for emergency calls: *AS/CA S042:2022 Requirements for Connection to an air interface of a Telecommunications Network Australian Standard*.

5.2 AS/CA S042 is the customer equipment standard used by mobile device makers to test for the Australian market so they can be labelled and sold in Australia. The WC revised the standard to clarify that the test methods for requirements for mobile devices are properly executed.

5.3 Specifically, the standard was updated to clarify testing of customer equipment:

a) Test calls for Emergency Call Service access, clarifying the test methods for customer equipment operating in Emergency Call Service Access Mode, and for camp-on. These clarifications include testing equipment to confirm that emergency calls are supported via camp-on to each of the three national mobile carriers in a range of network scenarios, such as various core network technologies and via Wi-Fi-calling.

b) We briefly explain how technical standards are regulated for mobile devices (described in greater detail in Appendix 2):

i. Section 376 of the Act sets out the ACMA's powers to make technical standards.

ii. Section 377 of the Act enables the ACMA to apply, adopt or incorporate matters in a standard developed by Standards Australia or another body (e.g. the ATA being an accredited Standards Development Organisation).

iii. Section 407 of the Act enables the ACMA to make an instrument establishing labelling requirements for customer equipment subject to section 376. The ACMA made the *Telecommunications (Labelling Notice for Customer Equipment and Customer Cabling) Instrument* (Telecommunications Labelling Notice) for this purpose.

iv. The AS/CA S042 Standard is called upon in Schedule 1 of the Telecommunications Labelling Notice, *Applicable technical standards for customer equipment*, as a requirement for customer equipment suppliers to supply mobile devices in Australia.

v. To meet the requirements of the Telecommunications Labelling Notice, customer equipment suppliers complete a Declaration of Conformity by way of the ACMA's C02 form. Once a supplier has done so, it can apply a compliance label known as the Regulatory Compliance Mark.

Regulatory Compliance Mark (RCM)

5.4 International technical standards also form part of the compliance regime. For example, the AS/CA S042 Standard gives reference to European Telecommunications Standards Institute (ETSI) technical specifications, which form part of 3GPP global technical specifications for mobile devices. It also refers to documentation from the United States Federal Communications Commission (FCC) and International Telecommunications Union (ITU).

5.5 The updated AS/CA S042 Standard was published on 30 June 2025. On publication, AS/CA S042

became an applicable standard that mobile devices must comply with. Under Part 21 of the Act, the ACMA's powers relating to non-compliance include imposing conditions on equipment suppliers, written directions, civil penalties, and seeking court actions.

6. DEVICE END-TO-END SERVICE TESTING WORKING GROUP

6.1 On 18 November 2024, the ATA invited members to join DETEST Working Group, established to develop technical guidance to facilitate the end-to-end testing and technical operational arrangements for the National Messaging System and the Emergency Call Service.

6.2 This group assisted in operationalising the testing system described in the *C674: Emergency Calling – Network and Mobile Phone Testing Code* by engaging with UTS in their development of network test scenarios and emergency call test cases.

6.3 In November 2025, the DETEST Working Group's Terms of Reference were updated to include the sharing of technical information of identified issues and test results of mobile device behaviour between MNOs, following the discovery of inconsistent behaviour with certain older devices when attempting to camp-on across different mobile networks.

6.4 This technical information sharing will be undertaken with a view to developing an industry database for device issues and capabilities in relation to Triple Zero, to assist MNOs with their management of device capabilities. It is envisaged that this information be used to assist the development of a database operated by the ACMA or another appropriate government agency in future.

6.5 While not connected to the Bean Review or 3G shutdown, this working group also leads industry collaboration with the National Emergency Management Agency (NEMA) and DITRDCSA on the technical implementation and testing of Emergency Cell Broadcast technology, as part of the National Messaging System.

7. WC 123: NETWORK MANAGEMENT FOR EMERGENCY CALLS

7.1 In response to Recommendation 16, WC 123 developed a new technical guideline, *G675:Network Management for Emergency Calls*, published in February 2025.

7.2 Industry code *C536:Emergency Call Services Requirements* (enforceable by the ACMA) was updated to include obligations consistent with Recommendation 16 and this new guideline.

7.3 The code was varied (among other things) to include new requirements regarding network management tools and redundancy capabilities to be utilised during a core network outage.

7.4 This code and the related guideline established a new, enforceable regulatory requirement to:

a) Establish "the ability to remotely access and activate network management tools [...] in the event of a core network outage";

b) Have "sufficient network redundancy to deploy" these network management tools "in the event of a core network outage"; and

c) Maintain alignment with any relevant international specifications.

7.5 The updated code was submitted to the ACMA on 27 June 2025, and registered on 9 October 2025. Upon registration, the revised code became enforceable by the AMCA.

8. RECOMMENDATIONS TO IMPROVE THE REGULATORY FRAMEWORK

8.1 The current regulatory environment involves multiple parties testing and providing information about the emergency calling capability of mobile phones:

a) **Customer equipment suppliers**: Under the Telecommunications Labelling Notice, suppliers are required to test their products for compliance with the emergency calling requirements in Australian Standard AS/CA S042 (as described above). Suppliers have to keep private records of compliance (i.e., Declarations of Conformity) which must be made available to the ACMA on request.

b) **Mobile Network Operators**: To support the shutdown of 3G networks in 2024, the ACMA amended the *Emergency Call Service Determination 2019* on 28 October 2024 (and subsequently on 1 November 2025) to require telcos to inform customers about devices that are unable to make emergency calls, and to block those devices from connecting to mobile networks.

To give effect to this requirement, mobile carriers had to implement a program liaising with equipment suppliers and analysing call records to determine which device models would not be able to make emergency calls after the 3G shutdown. Information about device compatibility post-3G shutdown was made available to the public via lookup tools on the websites of mobile carriers and the Australia Mobile Telecommunications Association (AMTA).

c) **Controlled Test Facility**: As described earlier, in response to Recommendation 3 of the Bean Review, the ATA developed the ACMA-registered and enforceable industry code *C674: Emergency Calling – Network and Mobile Phone Testing*. The code sets out the requirements for a Controlled Test Facility (initially hosted by the UTS National Telecom Resilience Centre under its contract with DITRDCSA) to conduct 6-monthly tests of the emergency calling behaviour of 10-20 devices under specific network failure scenarios. A different set of phone types will be selected for each of these 6 monthly tests. This testing requires mobile carriers to install base station equipment in the Controlled Test Facility that is connected to their model networks. The first round of testing commenced on 5 November 2025.

8.2 MNOs also undertake voluntary testing of devices (outside current regulatory requirements) they sell to provide additional assurance about the emergency calling capability of those devices. While test scenarios and results do not translate perfectly across networks, MNOs (through the DETEST group) are now establishing processes to share information about known device issues and results of testing behaviours through a database.

8.3 It is worth noting that there is a plethora of devices (tens of thousands) which are not sold by MNOs but are being brought into the market (and connected to the network) by other channels, e.g. retailers (e.g. JB Hi-Fi), refurbished phones, phones brought into Australia by users from overseas etc. For this purpose, it is important to distinguish between a SIM, which may be MNO-branded, vs. a device, which may be sold or used in conjunction with an MNO-branded SIM but not be part of the devices tested by an MNO.

9. LIMITATIONS OF THE CURRENT APPROACH

9.1 The current multi-party approach is potentially inefficient as some elements of testing are duplicated across device suppliers, mobile carriers who also test devices they sell, and the Controlled Test Facility.

9.2 Device suppliers are required to apply the Regulatory Compliance Mark, but there is no public register of compliant devices (i.e., public register of Declarations of Conformity) – nor any independent auditing of devices that have applied the Regulatory Compliance Mark.

9.3 MNOs are required to inform customers and block devices under the *Emergency Call Service Determination 2019*; however, information about blocked devices is not available on any public or centralised register.

9.4 The Controlled Test Facility testing regime established under code C674 will only test a small fraction of devices in market (10-20 per year out of well over 40,000 handset makes/models in Australia), and while MNO device testing will complement these efforts, there will still be a significant number of devices in market that are not captured by these testing arrangements and will be impossible to capture by testing arrangements due to the nature of the devices and how they are brought into market, e.g. grey market imports etc.

9.5 These requirements overlap in some parts, but even when combined still leave gaps in the regulatory framework. For example, device testing conducted in the Controlled Test Facility under code C674 may identify devices that may not be able to make emergency calls in some circumstances, even though these devices may be compliant with all relevant technical standards and have an Regulatory Compliance Mark issued through the Telecommunications Labelling Notice regime.

9.6 While MNOs can observe which devices are making emergency calls on their networks, it is not possible to undertake comprehensive testing of the emergency capability of all different device types attaching to their networks. MNOs do not have direct access to physical samples of the majority of devices (also due to the large range of different operating system versions) for testing purposes. Additionally, analysis of network data to ascertain whether a device can make an emergency call is not reliable where there are only a small number of devices in operation.

9.7 For equipment suppliers to deliver affordable devices at scale, they utilise harmonised global standards. If global equipment suppliers are required to adhere to bespoke, Australia-only requirements, this will impact Australia's access to the global device market and is likely to have wider ramifications for Australia's multilateral trade agreements.

9.8 We consider global standards augmented by Australian standards such as AS/CA S042, and the

ACMA's Telecommunications Labelling Notice form a regulatory compliance regime that by design, is fit for purpose.

10. OPPORTUNITIES FOR IMPROVEMENT

10.1 We consider the design of the regulatory compliance regime is fit-for-purpose, in that the standards are clear, and there are clear obligations on the different parties in the overall mobile ecosystem.

10.2 To address the above issues, an uplift in transparency of the existing regulatory framework for mobile device compliance in Australia is required.

10.3 Consumers would benefit from a 'single authoritative source' about the compliance of devices with emergency calling capability, as required under the Telecommunications Labelling Notice, in a manner they can easily refer to when purchasing a new device.

10.4 Similarly, industry would benefit from a 'single authoritative source' about the emergency calling capability and compliance of different mobile devices that they can easily refer to when considering which devices to sell, how to inform customers about the capability of the devices, and when deciding what devices are to be blocked.

10.5 Under the Telecommunications Labelling Notice regulations, device manufacturers and/or importers are required to certify, through a Declaration of Conformity, that their device conforms to Australian standards, including AS/CA S042.

10.6 The ACMA is the authority responsible for the Telecommunications Labelling Notice and Regulatory Compliance Mark regimes and is best placed to take a strong enforcement stance regarding compliance with existing (and updated) regulations.

10.7 Transparency improvements should leverage existing mechanisms rather than build new ones. Thus, MNOs propose the collection and publication of Declarations of Conformity, which will allow MNOs and the public to check whether devices have been tested and comply with legislative requirements.

10.8 Relevant technical standards, such as AS/CA S042.1, are regularly reviewed and updated to ensure they are fit for purpose, including setting expectations for emergency calling (and other matters) for all mobile operator networks in Australia. The ATA performs this work, together with its members and other relevant stakeholders.

10.9 Mobile device suppliers are responsible for all device compliance testing, including emergency call testing, against AS/CA S042.1 and other relevant standards.

10.10 MNOs believe that the Telecommunications Labelling Notice regime could be improved by a requirement for mobile device suppliers to populate a public register of compliant (tested) devices sold in Australia. The register would include the Declaration of Conformity for each device type, as is already required to be provided upon request. Device manufacturers and importers could also submit test report records, to substantiate their Declaration of Conformity. Records should be maintained until the device is no longer supported by the supplier.

10.11 This public register would establish a 'single authoritative source' that can be relied on by

consumers, industry, and regulators to determine the compliance (and safety) of mobile devices in Australia. Such a register could be administered by the ACMA or another appropriate government agency, noting that the ACMA has responsibility for compliance with the Telecommunications Labelling Notice regime. The ACMA also already administers other regulatory registers (e.g. the Radiocommunications Register of Licences, the SMS Sender ID Register and, potentially soon, the Carriage Service Provider Register).

10.12 To give end-users and industry confidence in the information on the register, the ACMA could also monitor and enforce compliance with the Telecommunications Labelling Notice regime. Supplier education will be critical and regular audits of a sample of devices in market should be undertaken.

10.13 The Controlled Test Facility and code C674 testing work would effectively become a regular (6-monthly) audit which could contribute to the ACMA's compliance monitoring and enforcement program. Any Controlled Test Facility concerns about device compliance with existing standards would be communicated to the ACMA.

10.14 If this testing/auditing were to find gaps in device (and network) emergency calling capability that are not addressed by the relevant standards, then information about these gaps should be fed back to device suppliers and international standards bodies so they can be addressed in future iterations of the standards and device design.

10.15 Testing under code C674 is expected to be useful for industry through identifying any niche scenarios where a mobile phone compliant with AS/CA S042.1 and related international technical standards may be unable to make an emergency call, e.g. because of the way the phone interprets network error codes that are not defined in the standards. Australia can then use this information to influence manufacturers and international standards bodies to develop solutions for incorporation into future versions of the standards.

10.16 The *Emergency Call Service Determination 2019* device notification and blocking obligations could be updated to require telcos to inform consumers about the public register of compliant devices, warn customers if their connected devices are not on that register and may not be able to make emergency calls, and block any devices identified on the register that cannot make emergency calls. Telcos ought to be prohibited from selling devices that they know are non-compliant but should otherwise not be liable for non-compliant devices or their replacement.

10.17 Product compliance and safety registers already exist for other regulated products in Australia. One example is the Energy Rating Product Database which contains energy efficiency data for products registered for sale in Australia with the Greenhouse and Energy Minimum Standards Regulator. Another example is the Electrical Equipment Safety System (EESS) which provides a public register of medium and high-risk products that are compliant with the relevant electrical safety standards. Similarly, the Australian Register of Therapeutic Goods provides a searchable database of medicines, medical devices and biologicals that can be supplied within Australia. These and other similar registers could be used as examples for the development of a register focused on telecommunications device compliance.

APPENDIX 1: BEAN REVIEW RECOMMENDATIONS 3, 4, AND 16

RECOMMENDATION 3

To ensure (to the extent possible) continuous access to Triple Zero, carriers must conduct 6-monthly end-to-end testing of all aspects of the Triple Zero ecosystem within and across networks. The end-to-end detection testing should include:

- Network functionality and capability during outages of various types
- Behaviour of all known devices in different circumstances
- Interoperability of all parts of the ecosystem (from originating carrier, to ECP, to ESO answering point) during outages.

Any identified deficiencies must be reported to the ACMA and be accompanied by a remediation plan with timetable.

This requirement should be mandated in a standard or determination.

Government Response

Agreed.

While acknowledging the carriers currently undertake testing of devices and networks, the Review has identified there are significant gaps in the scope of this testing. Addressing these gaps must be treated as a high priority to ensure public safety during times of crisis, and to reduce the risk of device and network related outages. The current issues being presented by the closure of the 3G Networks and the impact of this on certain types of handsets demonstrates that the current testing regime is not well adapted.

The Government supports the development of an industry code, providing industry with an opportunity to identify how a sustainable comprehensive testing regime could be implemented to address these gaps. The Government's expectation is that this code should be in place within twelve months of the release of this response, and will consider regulatory interventions if a robust industry code is not in place at that time.

RECOMMENDATION 4

If this testing does not include devices supplied by the customer (i.e. 'Bring your own device') then information should be provided to those customers warning that those devices may not have been tested in emergency scenarios.

Government Response

Agreed.

The Government understands that carriers are unable to test every possible device and device configuration due to the prevalence of customer supplied devices. In these circumstances it is appropriate for carriers and carriage service providers to advise customers of the potential limitations of these devices.

This Government supports this recommendation being implemented in conjunction with recommendation 3.

RECOMMENDATION 16

Network operators should be required to establish the ability to remotely access and activate network management tools, and have sufficient network redundancy to deploy them, in the event of a core network outage.

Government Response

Agreed.

The Government acknowledges that Optus has indicated it is implementing this measure in response to the 8 November outage. It is appropriate for these arrangements to be made an explicit requirement to prevent similar circumstances occurring in any potential future outages.

The Government supports the development of an industry code, providing industry with an opportunity to identify how this recommendation could best be implemented. The Government's expectation is that this code should be in place within twelve months of commencement of drafting.

APPENDIX 2: CUSTOMER EQUIPMENT COMPLIANCE UNDER TECHNICAL REGULATIONS

APPLICABILITY

The ***Telecommunications (Labelling Notice for Customer Equipment and Customer Cabling) Instrument 2025*** (Telecommunications Labelling Notice or TLN) lists five categories (items) of customer equipment. Primarily Items 2 and 5 relate to mobile handsets:

a) Item 2: customer equipment that is:

   i. used, or is to be used, for connection with a Public Mobile Telecommunications Service (PMTS); and

   ii. used to supply an Standard telephone Service (STS); and

   iii. an addressable device:

   Regulatory instrument: the ACMA's ***Mobile Equipment Air Interface Technical Standard 2022***, which calls up the following industry customer equipment standards:

   - AS/CA S042.1:2025 - Emergency Call access (000, 112), acoustic safety (max SPL), device identification (IMEI/PEI) and support for the National Messaging System (Emergency Cell Broadcast).
   - AS/CA S042.4:2025 - technical requirements for 3G/4G (IMT-2000/Advanced) devices, including band support, RF performance and protocol conformance, and test methods.
   - AS/CA S042.5:2025 - technical requirements for 5G (IMT-2020) devices, including FR1/FR2 band support, RF performance and protocol conformance, and test methods.

b) Item 5: equipment safety:

   - Regulatory instrument: the ACMA's ***Customer Equipment Safety Standard 2018***, which calls under the following Australian/New Zealand industry equipment safety Standard:
     - AS/NZS 62368.1:2022 (ICT customer equipment safety standard - safety requirements for audio/video, information, and communication technology equipment. Covers such areas as electrical safety, fire and mechanical hazards.

   Note that if customer equipment also connects to a non-PMTS telecommunications network, e.g. a cellar modem that incorporates cellular fallback capability, then Item 1 applies. If the customer equipment also connects to a satellite service, then Item 4 applies. (Items 1 and 4 not reproduced for simplicity.)

TRANSITION/OVERLAP PERIODS FOR STANDARDS

When a new version of a standard is published (e.g., AS/CA S042.1:2025, published 30 June 2025), there is a 12-month (default) transition period during which a supplier can demonstrate compliance with either

the previous version (AS/CA S042.1:2022) or the new version (AS/CA S042.1:2025).

For devices manufactured or imported during the overlap, the supplier may test and declare compliance to either version. After the transition, only the latest version is accepted.

The default period of 12 months can be varied via an ACMA regulatory instrument.

PRODUCT TESTING

Handsets are to be tested against all applicable parts of AS/CA S042.1, S042.4, S042.5, and AS/NZS 62368.1, depending on the technologies supported (3G, 4G, 5G and safety). The testing must verify compliance with all mandatory requirements (designated by 'shall' in the standards).

For high-risk standards, such as AS/CA S042, the Declaration of Conformity must be supported by an endorsed test report (National Association of Testing Authorities (NATA)-accredited or equivalent), a certification body statement, or an IECEE Certification Body Test Report with Certificate.

Compliance with AS/NZS 62368.1:2022 is typically demonstrated via a test report from a NATA-accredited or IECEE Certification Body Scheme laboratory and may be required for Electrical Equipment Safety System (EESS) registration (for electrical safety).

If the device is already tested to ETSI/3GPP Standards, the supplier may only need to test for Australian-specific requirements, but this must be documented and justified in the Declaration of Conformity.

Testing options:

a) NATA-accredited laboratories (Australia)
   - Recognised by the ACMA: test reports are endorsed, providing easier regulatory acceptance and local support. May have longer lead times and may be higher cost than some overseas labs.

b) Overseas accredited laboratories
   - Often used by global handset brands, can combine with European/US Federal Communications Commission (FCC) testing, may be faster/cheaper for high volume. Must ensure the laboratory is International Laboratory Accreditation Cooperation - Mutual Recognition Arrangement (ILAC-MRA) accredited (mutual recognition with NATA), and test reports are accepted by the ACMA.

c) In-house testing (OEMs)
   - Only valid if the in-house lab is NATA-accredited or equivalent (ILAC-MRA), otherwise test reports may not be accepted for high-risk standards. Benefits include control over process, cost-effective for large manufacturers.

CERTIFICATION BODIES AND THEIR ROLE

Certification bodies s are organisations accredited to certify products for compliance with specific Standards (e.g., under the International Committee for Electrical and Electrotechnical Equipment (IECEE) Certification Body Scheme for electrical safety). For high-risk standards (e.g., AS/CA S042.1, AS/NZS 62368.1), a statement from a certification body or a certification body test report/certificate is accepted

as evidence of compliance.

Certification bodies may be NATA-accredited or recognised under international mutual recognition agreements (ILAC-MRA, IECEE Certification Body Scheme).

Certification bodies review test data, verify conformity, and issue certificates/statements that can be used in the Declaration of Conformity and compliance record.

Using a certification body can streamline acceptance of overseas test data and is especially important for electrical safety (AS/NZS 62368.1).

LABELLING

The Regulatory Compliance Mark must be applied to each device before supply. The Regulatory Compliance Mark can be physical, electronic (for devices with a display), or via QR code linking to compliance information. Electronic labelling is permitted for devices with a display, provided instructions are included in documentation or on the supplier's website.

If the device does not comply, a non-compliance label and written statement are required (rare for mainstream handsets).

DOCUMENTATION AND RECORD-KEEPING

All records must be in English and may be electronic or certified copies. Records must be kept for at least two years after last supply and must be available for inspection by the ACMA.

Items in the compliance record:

a) a Declaration of Conformity, prepared and signed by an authorised person, stating the device complies with all applicable standards. The Declaration of Conformity must reference the test reports and supporting documents.

b) test reports (or endorsed test reports for high-risk devices). NATA, ILAC-MRA, Certification Body/IECEE Certification Body Scheme for all applicable standards.

c) product description - model numbers, photos of internal/external aspects, software version, block diagram.

d) documentation supplied with the product (installation, operation, warnings).

e) written statements for any modifications (if applicable).

f) agency agreements (if an agent keeps records).

The ACMA may request compliance records at any time (random audit, complaint, or market surveillance). They will review the Declaration of Conformity, test reports, and supporting documents for authenticity, scope, and validity (e.g., NATA/ILAC-MRA endorsement, correct standards/version, correct product). They may contact the test lab or certification body to verify the report. They may request a sample for independent testing. Failure to provide records, or provision of false/misleading records, is an offence with significant penalties.

REGISTRATION

Register as a supplier on the national database (EESS Registration Database) before supplying the device (mandatory only if scoped). If the device is supplied with a charger, the charger is treated as in-scope electrical equipment under the EESS.

ONGOING COMPLIANCE

Update compliance (and retest if necessary) if the product/s are modified, both hardware or software, in a way that could affect compliance. This does not address changes to devices already supplied to the market, e.g. via operating system (OS) updates.

Monitor for changes in standards (transition periods apply for new standards).

HOW NON-COMPLIANT DEVICES CAN ENTER THE MARKET

'Grey market' imports: devices imported directly by resellers or consumers, bypassing local compliance checks.

False or incomplete documentation: suppliers may submit non-endorsed or incomplete test reports, or Declarations of Conformity not backed by valid evidence.

The ACMA relies on post-market surveillance and complaints; not all shipments are checked at the border.

Ends

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