

**COMMUNICATIONS
ALLIANCE LTD**



INDUSTRY GUIDELINE

G643:2011

MOBILE LOCATION INFORMATION (MoLI)
PROCESSES FOR THE EMERGENCY CALL SERVICE

JULY 2011

G643:2011 Mobile Location Information (MolI) Processes for the Emergency Call Service Industry Guideline

First published as G643:2011 in April 2011

This edition published as G643:2011 July 2011

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INTRODUCTORY STATEMENT

The Mobile Location Information (MoLI) Processes for The Emergency Call Service Guideline (G643:2011) is designed to:

- Gather in one place information on mobile carrier processes for interaction with ESOs about the location of mobile devices used to make an Emergency Call; and
- Inform ESOs about these processes.

As context for the development of these processes, the ACMA consultation paper **Enhanced mobile location information for the Emergency Call Service** (released May 2010) reported that:

"The proposed model is focused on delivering a solution that will improve outcomes for consumers who are unable to communicate their location when calling Triple Zero from a mobile phone. These situations are estimated to be less than one per cent of mobile calls connected to emergency service organisations each year".

Therefore Mobile Carriers understand the additional mobile location information (MoLI) obtained via the processes in this guideline will only be required by ESOs in exceptional circumstances. That is, the processes in this guideline will be used where an ESO has exhausted all other avenues in obtaining the location of the mobile device used to make an Emergency Call to Triple Zero. Mobile Carriers may not be able to provide the desired level of access for all ESO requests should ESOs not meet this 'exceptional circumstance' requirement.

There is ongoing discussion within the telecommunications industry on longer term solutions for location information in relation to Emergency Calls that could scale up to meet greater demand from ESOs.

Alexander R. Osborne
Chair
Interim MoLI for ECS Processes Working Committee

July 2011

TABLE OF CONTENTS

1	GENERAL	2
	1.1 Introduction	2
	1.2 Scope	2
	1.3 Objectives	3
	1.4 Guideline review	3
2	ACRONYMS, DEFINITIONS AND INTERPRETATIONS	4
	2.1 Acronyms	4
	2.2 Definitions	4
	2.3 Interpretations	6
3	OPTUS PROCESS	7
	3.1 Introduction	7
	3.2 During Business Hours and After Hours	7
	3.3 Contact Details	7
4	TELSTRA PROCESS	9
	4.1 Purpose	9
	4.2 Scope	9
	4.3 Action	9
	4.4 Telstra mobile device	9
	4.5 Non-Telstra mobile device	9
	4.6 Locating the mobile device	10
	4.7 EXCEPTIONAL CIRCUMSTANCE REQUIREMENT	10
	4.8 INFORMATION REQUIRED FROM ESO	10
	4.9 CONTACT INFORMATION REQUIRED BY THE ESO	11
	4.10 PROCESS FLOWCHART	11
	4.11 Telstra actions following receipt of ESO request	13
5	VODAFONE HUTCHISON AUSTRALIA PROCESS	14
	5.1 During Business Hours	14
	5.2 After Hours	14
	5.3 Contact Details	14
6	REFERENCES	16
	APPENDIX	17
A	ESO MOBILE DEVICE LOCATION REQUEST	17
	APPENDIX	19
B	LIST OF EMERGENCY SERVICE ORGANISATIONS	19
	PARTICIPANTS	22

1 GENERAL

1.1 Introduction

- 1.1.1 Section 52 of the [Telecommunications \(Emergency Call Service\) Determination 2009](#) (the Determination) sets out an obligation for a carrier, CSP or ECP to give information to an Emergency Service Organisation (ESO) about an Emergency Call.
- 1.1.2 The [Telecommunications \(Emergency Call Service\) Determination Amendment No.1 2011](#) (the Amendment) introduced a section 52A of the Determination that obliges a Mobile Carrier to give an ESO "*the most precise mobile location information available about the location of the customer equipment*" from which an Emergency Call originated.
- 1.1.3 The development of the Guideline has been facilitated by Communications Alliance through a group comprised of representatives from mobile network operators in the telecommunications industry.
- 1.1.4 The Guideline should be read in the context of other relevant industry codes, guidelines and documents.
- 1.1.5 The Guideline should be read in conjunction with related legislation and regulatory instruments, including:
 - (a) [The Telecommunications Act 1997](#) (the Act);
 - (b) the Determination; and
 - (c) the Amendment.
- 1.1.6 If there is a conflict between the requirements of the Guideline and any requirements imposed on a Carrier or CSP by legislation, the Carrier or CSP will not be in breach of the Guideline by complying with the requirements of the legislation.
- 1.1.7 Compliance with this Guideline does not guarantee compliance with any legislation. The Guideline is not a substitute for legal advice.
- 1.1.8 Statements in boxed text are a guide to interpretation only and not binding as Guideline rules.

1.2 Scope

- 1.2.1 The Guideline describes the proposed processes which will be used by Mobile Carriers to provide an ESO with the location information of an Active Mobile Device in response to an authorised request from an ESO about an Emergency Call.
- 1.2.2 The Guideline applies to the Carriers section of the telecommunications industry under section 110 of the Act.

- 1.2.3 The Guideline deals with the telecommunications activity "*carrying on business as a Carrier*" as defined in section 109 of the Act.

1.3 Objectives

- 1.3.1 The objectives of the Guideline are:
- (a) to set out industry process(es) for Mobile Carriers to handle location queries from ESOS in relation to Emergency Calls from Active Mobile Devices; and
 - (b) to include designated contact point(s) and telephone number(s) for such location queries.

1.4 Guideline review

- 1.4.1 The Guideline will be reviewed after 5 years of the Guideline being published and every 5 years subsequently, or earlier in the event of significant developments that impact on the Guideline.

2 ACRONYMS, DEFINITIONS AND INTERPRETATIONS

2.1 Acronyms

For the purposes of the Guideline:

ACMA

means Australian Communications and Media Authority.

CAD

means Computer Aided Despatch.

CSP

means Carriage Service Provider.

ECP

means Emergency Call Person.

ESO

means Emergency Service Organisation.

LEA

means Law Enforcement Agency.

LELU

means Law Enforcement Liaison Unit.

MoLI

means Mobile Location Information.

MSISDN

means Mobile Subscriber Integrated Services Digital Number.

TTCC

means Telstra Trace Control Centre.

2.2 Definitions

For the purposes of the Guideline:

Act

means the *Telecommunications Act 1997 (Cth)*.

Active Mobile Device

means a mobile device that is turned on and has been correctly authenticated on a network used to supply a Public Mobile Telecommunications Service.

Amendment

means the *Telecommunications (Emergency Call Service) Determination Amendment No.1 2011*.

Carriage Service Provider

has the meaning given by section 87 of the Act.

Carrier

has the meaning given by section 7 of the Act.

Determination

means the *Telecommunications (Emergency Call Service) Determination 2009*.

Emergency Call

has the meaning given by the Determination.

Emergency Call Person

has the meaning given by section 7 of the Act.

Emergency Service Organisation

has the meaning given by section 147 of the *Telecommunications (Consumer Protection and Service Standards) Act 1999*.

Mobile Carrier

has the meaning given by section 52A of the Determination.

Public Mobile Telecommunications Service

has the meaning given by section 32 of the Act.

Triple Zero

has the meaning given by the "primary emergency service number" (i.e. 000), in section 3.24 of the *Telecommunications Numbering Plan 1997*.

Triple Zero Job Number (6 digits)

means the six digit job number provided with each 000 call transferred to the ESO by the Emergency Call Person for Triple Zero.

2.3 Interpretations

In the Guideline, unless the contrary appears:

- (a) headings are for convenience only and do not affect interpretation;
- (b) a reference to a statute, ordinance, code or other law includes regulations and other instruments under it and consolidations, amendments, re-enactments or replacements of any of them;
- (c) words in the singular includes the plural and vice versa;
- (d) words importing persons include a body whether corporate, politic or otherwise;
- (e) where a word or phrase is defined, its other grammatical forms have a corresponding meaning;
- (f) mentioning anything after include, includes or including does not limit what else might be included;
- (g) words and expressions which are not defined have the meanings given to them in the Act; and
- (h) a reference to a person includes a reference to the person's executors, administrators, successors, agents, assignees and novatees.

3 OPTUS PROCESS

3.1 Introduction

- 3.1.1 At the time of publication, Optus is establishing direct connections between ESOs and Optus for online requests of Mobile Location Information (MoLI).

3.2 MoLI Request Contact Details

- 3.2.1 ESO to email an authorised request to the Optus network management centre at ESOMoLI.request@optus.net.au.
- 3.2.2 Refer to Appendix A for a sample form. This form will be set up as an email template (i.e. Optus email address, subject line and preconfigured form will be embedded in an email template). The email form will be completed and sent to Optus.
- 3.2.3 ESO Staff call the Optus Network Management Centre (NMC) on **02 8085 6661** to advise that an email request has been sent.
- 3.2.4 The Optus network management centre will complete the request and email it back to the ESO.

NOTES:

1. Each ESO will need to supply to Optus a group email address for each communication centre.
2. Optus will not respond to MoLI requests from personal email addresses.

- 3.2.5 The Optus network management centre is the contact point for an ESO seeking additional clarification on a request e.g. an update.

3.3 Administrative Contact Details

- 3.3.1 Business hours and after hours email: NMCSWNDropbox@optus.net.au. Optus does not actively monitor this email address so if an urgent response is required then an email to this address must be accompanied by a phone call. This email address is for enquiries only. No mobile location information (MoLI) will be provided from this email address.
- 3.3.2 Business hours and after hours phone: **02 8085 6611**
- 3.3.3 Business hours and after hours fax: **02 8085 6111**. Optus does not actively monitor this fax number so if an urgent response is required then a fax to this number must be accompanied by a phone call.

3.3.4 The Emergency Contact if unable to make contact on the above numbers is the Optus Network Management Centre, Incident Control Group:

(a) Phone: **02 8085 9949**

(b) Mobile: **0403 399 259**

4 TELSTRA PROCESS

4.1 Purpose

- 4.1.1 The purpose of this section is to describe the proposed Interim Mobile Device Location process which will be used by Telstra to provide Emergency Service Organisations (ESO) with the location information of a customer mobile device (which has been used to make an Emergency Call to Triple Zero) on the Telstra network on a 24/7 basis.

4.2 Scope

- 4.2.1 This work process will only apply to a lawful request received in writing from an ESO to locate an Active Mobile Device on the Telstra Network under s 286 of the Act or s 52A of the Determination.
- 4.2.2 Telstra will provide upon the receipt of a lawful request for Mobile Location Information (MoLI) received in writing from an authorised requestor (i.e. ESO) the location information of the cell tower through which a customer mobile device made an Emergency Call to Triple Zero.
- 4.2.3 Telstra will use a mobile positioning system process to provide the location information of the cell tower to the ESO. This system was developed to provide location information to meet Telstra's obligations under the *Handling of Life Threatening and Unwelcome Communications Industry Code (C525:2009)*.

4.3 Action

- 4.3.1 When a lawful request from an authorised ESO is received by telephone (and confirmed by FAX) or FAX to locate a customer mobile device in a life threatening or time critical situation, the following actions will be carried out by Telstra.

4.4 Telstra mobile device

- 4.4.1 Upon receiving a lawful request received in writing from an authorised ESO, Telstra will check the mobile device's unique identifier (i.e. MSISDN, telephone or service number) to confirm that Telstra is the Carriage Service Provider (CSP) for that particular service number used to make the Emergency Call to Triple Zero.

4.5 Non-Telstra mobile device

- 4.5.1 If the mobile service number has been ported to another CSP or the mobile service number belongs to another CSP, Telstra will not be able to determine the location of the mobile device which was used to make the Emergency Call. Telstra will then advise the requesting ESO that the CSP is not Telstra and as such a location request cannot be undertaken by Telstra.

4.6 Locating the mobile device

- 4.6.1 Where Telstra is the CSP providing the mobile service it will use a mobile positioning system process to determine the location of the cell tower through which the active mobile device made an Emergency Call. The geographic location information of the tower will then be provided to the requesting ESO by return fax.
- 4.6.2 The interim solution requires the location system to query a mobile device for its current location and, as such, the degree of accuracy of the location information will be dependent on the capabilities of both the individual's mobile device and the mobile network to which the mobile device was connected. As a minimum, the interim solution will provide location information relating to latitude and longitude of the cell tower to which the active mobile device is connected.
- 4.6.3 If the mobile positioning system process is unable to provide the current location of the mobile device e.g. where the mobile device is not active, Telstra will convey by fax that outcome to the requesting ESO.
- 4.6.4 Where the mobile device is not active, the ESO may make a further written request to Telstra requesting Telstra to undertake a second check to ascertain the location of the mobile device based on the most recent call data on the Telstra mobile network made from the mobile device (which may take a longer period of time). Telstra will conduct the second check and where the check is successful; Telstra will advise the requesting ESO of the last known location information of the mobile device.
- 4.6.5 Telstra will not attempt to locate another CSP's mobile device roaming onto the Telstra Network as the default CLI, MSISDN, telephone or service number provided by the network does not enable a location search.

4.7 EXCEPTIONAL CIRCUMSTANCE REQUIREMENT

- 4.7.1 This process is to be used only in exceptional circumstances where an ESO has exhausted all other avenues in obtaining the location of the mobile device used to make an Emergency Call to Triple Zero. Telstra is relying on the ACMA's advice that mobile location information will only be required by ESOs in exceptional circumstances.
- 4.7.2 Telstra may not be able to provide the required level of access for all ESO requests should ESOs not meet this 'exceptional circumstance' requirement.

4.8 INFORMATION REQUIRED FROM ESO

- 4.8.1 To enable Telstra to determine the location information of the active mobile device on its network, Telstra requires the authorised ESO to provide the following information concerning

the mobile device that was used to make an Emergency Call to Triple Zero:

- (a) Mobile Number Emergency Call was made from
- (b) Emergency Call Date: ___ / ___ / ___ Time: ___:___ (24 hr)
- (c) Computer Aided Despatch (CAD) Number
- (d) Triple Zero Job Number (6 digits) (as provided by Triple Zero when initial call despatched to ESO).

4.8.2 The ESO officer making the request will also have to supply on the written request:

- (a) their name;
- (b) rank designation; and
- (c) contact details.

4.8.3 Refer to Appendix A for an example of the ESO Mobile Device Location Request Form.

4.8.4 This form must also be used by the ESO when requesting a second check on an inactive mobile device.

4.9 CONTACT INFORMATION REQUIRED BY THE ESO

4.9.1 TTCC Telephone Number: 1300 361 674

4.9.2 TTCC FAX Number: (03) 9544 0271

4.10 PROCESS FLOWCHART

4.10.1 Refer to Figure 1.

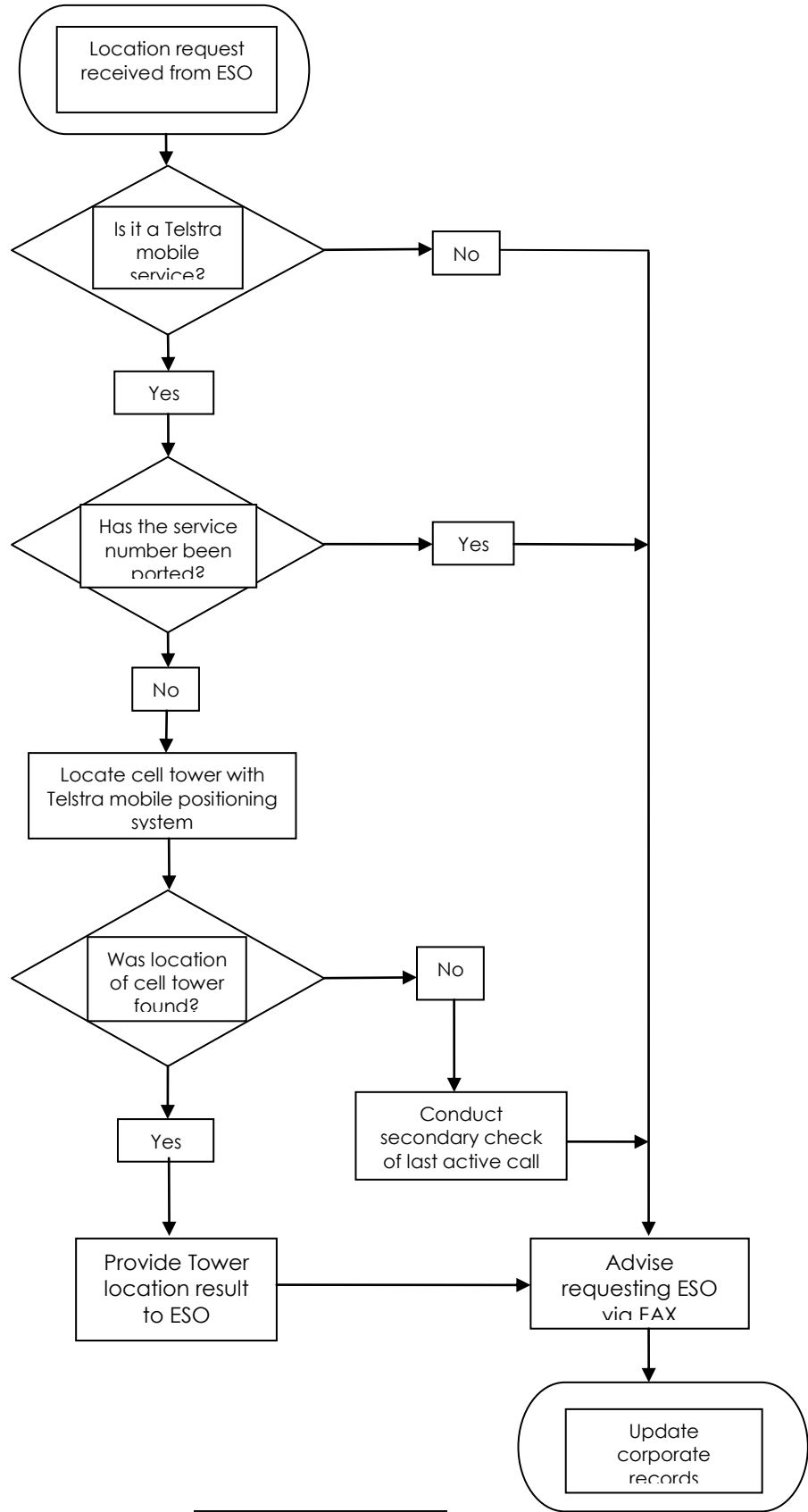


FIGURE 1
Telstra Process

4.11 Telstra actions following receipt of ESO request

- 4.11.1 The Telstra actions following receipt of ESO request are:
- (a) Action authorised location request from ESOs;
 - (b) Check that mobile device is a Telstra service;
 - (c) Check to see if mobile service has been ported;
 - (d) If Telstra is not the CSP for the mobile device, advise ESO by FAX;
 - (e) If Telstra is the CSP for the mobile device, locate the active mobile device on Telstra's network;
 - (f) Provide the authorised ESO with the location request result by FAX;
 - (g) Where requested conduct secondary check based on last active call record;
 - (h) Send results of secondary check to ESO; and
 - (i) Complete all corporate records for audit purposes.

5 VODAFONE HUTCHISON AUSTRALIA PROCESS

5.1 During Business Hours

- 5.1.1 ESO is to contact VHA Agency Liaison on **02 8920 9233** with its request e.g. Subscriber Details/ Location Trace.
- 5.1.2 ESO to fax authorised request to VHA Agency Liaison team on **02 9412 8835**.
- 5.1.3 Refer to Appendix A for an example of the ESO Mobile Device Location Request Form.
- 5.1.4 For subscriber details VHA Agency Liaison will complete a subscriber request and fax it back to the ESO.
- 5.1.5 For Location Traces an ESO is to fax an authorised request through to VHA Agency Liaison which will then be forwarded to the VHA fault management team for actioning.

5.2 After Hours

- 5.2.1 ESO is to contact VHA fault management team on **02 8920 9233** with its request e.g. Subscriber Details/ Location Trace.
- 5.2.2 ESO to fax an authorised request to the VHA Fault Management Team on **02 9660 9637**.
- 5.2.3 Refer to Appendix A for an example of the ESO Mobile Device Location Request Form.
- 5.2.4 For subscriber details the VHA fault management team will complete a subscriber request and fax it back to the LEA/ESO.
- 5.2.5 For location traces an ESO is to fax an authorised request to the VHA fault management team on **02 660 9637** for actioning.

5.3 Contact Details

- 5.3.1 Business hours and after hours phone: **02 8920 9233**
- 5.3.2 Business hours fax: **02 9412 8835**
- 5.3.3 After hours fax: **02 9660 9637**
- 5.3.4 Emergency Contact Numbers if unable to make contact on the above numbers:
 - (a) VHA fault management: **1800 993 030**
 - (b) VHA Agency liaison Manager: refer to the Life Threatening Communications industry contact list maintained by Communications Alliance for contact details.

NOTES:

- 1. From 1 May 2011 the contact is David Moss on 0406 401 161.*
- 2. Industry contact lists typically are not publicly available and require the relevant access permission. Please contact Communications Alliance for more information.*

6 REFERENCES

Publication	Title
Industry Codes	
C525:2009	Handling of Life Threatening and Unwelcome Communications http://commsalliance.com.au/Documents/all/codes/c525
Legislation	
	<i>Telecommunications Act 1997</i> http://www.comlaw.gov.au/Series/C2004A05145
	<i>Telecommunications (Consumer Protection and Service Standards) Act 1999</i> http://www.comlaw.gov.au/Series/C2004A00441
	<i>Telecommunications (Emergency Call Service) Determination 2009</i> http://www.comlaw.gov.au/Series/F2009L04720
	<i>Telecommunications (Emergency Call Service) Amendment Determination 2011 (No.1)</i> http://www.comlaw.gov.au/Details/F2011L00157
	<i>Telecommunications Numbering Plan 1997</i> http://www.comlaw.gov.au/Series/F2005B00940

APPENDIX

A ESO MOBILE DEVICE LOCATION REQUEST

A1 Form Template

On the next page is a template of a form for an ESO to request mobile location information associated with an Emergency Call from a mobile device.

Identification details of
Emergency Service Organisation (ESO)

ESO Logo here

Name of Carrier/CSP: _____

ESO to complete:

Please provide the following location information for the mobile device listed below

Emergency Calling Number (A Party)(10 digits): _____

Emergency Call: _____ Date: ___ / ___ / _____ Time: ___:___ (24 hr)

Computer Aided Despatch (CAD) No: _____

Triple Zero Job Number (6 digits): _____

ESO to complete:

I certify that this request is made for the purposes connected with a matter or matters raised in this Emergency Call and the information will only be disclosed or used in accordance with:
Section 286 Telecommunications Act 1997 and
Section 52A Telecommunications (Emergency Call Service) Determination 2009.

Authorising Officer: _____
(Print Name) (Rank/Designation)

Authorising Officer Contact Details:

_____/_____/_____ :_____
(Signature) (Contact number) (Date) (Time)

Carrier to complete the response:

Date: ___/___/_____ Time: ___:___

Has the mobile device ported to another Carrier/CSP's network? Yes No

If yes, to which mobile Carrier? _____

Was Location request successful for the active call? Yes No

Was a secondary check based on the last active call required? Yes No

Cell Tower Location - Latitude: _____

Cell Tower Location - Longitude: _____

Attachments (MoLI map if available) or comments etc.: _____

Request Response: Date: ___ / ___ / _____ Time: ___:___ Seq No.: _____

Carrier Officer: _____
(Print Name) (Signature) (Contact number)

APPENDIX

B LIST OF EMERGENCY SERVICE ORGANISATIONS

Section 52A of the Determination obliges mobile carriers to supply an ESO with MoLI in relation to an Emergency Call.

Section 147(11) of the *Telecommunications (Consumer Protection and Service Standards) Act 1999* defines an ESO as:

- (a) a police force or service; or
- (b) a fire service; or
- (c) an ambulance service; or
- (d) a service specified in the numbering plan for the purposes of this paragraph; or
- (e) a service for despatching a force or service referred to in paragraph (a), (b), (c) or (d).

At the time of publication of this Guideline there was no additional service specified in the numbering plan for the purpose of the definition of an ESO, so the list of ESOs in Australia for the purpose of the Determination is understood to be that in Table 1.

TABLE 1
State and Territory Emergency Service Organisations

State	Emergency Service Organisation	Website
NSW	NSW Police Force	http://www.police.nsw.gov.au/
NSW	Fire and Rescue NSW	http://www.fire.nsw.gov.au/
NSW	NSW Rural Fire Service	http://www.rfs.nsw.gov.au/
NSW	Ambulance Service of NSW	http://www.ambulance.nsw.gov.au/
ACT	A.C.T. Emergency Service Agency	http://www.esa.act.gov.au/ESAWebsite/content_esa/home_page/esa_home_page.html
ACT	Australian Federal Police	http://www.afp.gov.au/
ACT	A.C.T. Fire	http://www.esa.act.gov.au/ESAWebsite/content_actfb/actfb_home_page/fire_brigade_home_page.html
ACT	A.C.T. Rural Fire Service	http://www.esa.act.gov.au/ESAWebsite/content_rfs/rfs_home_page/rfs_home_page.html
ACT	A.C.T. Ambulance	http://www.esa.act.gov.au/ESAWebsite/content_actas/home_page/ambulance_home_page.html
VIC	Victoria Police	http://www.police.vic.gov.au/
VIC	Metropolitan Fire and Emergency Services Board (MFB)	http://www.mfb.vic.gov.au/
VIC	CFA (Country Fire Authority)	http://www.cfa.vic.gov.au/
VIC	Ambulance Victoria	http://www.ambulance.vic.gov.au/
VIC	Emergency Service Telecommunications Authority	http://www.esta.vic.gov.au/
TAS	Tasmania Police	http://www.police.tas.gov.au/
TAS	Tasmania Fire Service	http://www.fire.tas.gov.au/
TAS	Ambulance Tasmania	http://www.dhhs.tas.gov.au/ambulance
QLD	Queensland Police Service	http://www.police.qld.gov.au/

QLD	Queensland Fire and Rescue Service	http://www.fire.qld.gov.au/
QLD	Queensland Ambulance Service	http://www.ambulance.qld.gov.au/
SA	South Australia Police	http://www.police.sa.gov.au/
SA	South Australian Metropolitan Fire Service	http://www.mfs.sa.gov.au/
SA	South Australian Country Fire Service	http://www.cfs.sa.gov.au/
SA	SA Ambulance Service	http://www.saambulance.com.au/
NT	Northern Territory Police, Fire and Emergency Services	http://www.nt.gov.au/pfes/
NT	St John Ambulance NT	http://www.stjohnnt.com.au/
WA	Western Australia Police	http://www.police.wa.gov.au/
WA	Fire and Emergency Services Authority of Western Australia	http://internet.fesa.wa.gov.au/
WA	St John Ambulance Western Australia	http://www.ambulance.net.au/

PARTICIPANTS

The Working Committee that developed the Guideline consisted of the following organisations and their representatives:

Organisation	Membership	Representative
Optus	Voting	Martin Green
Telstra	Voting	Michael Ryan
Vodafone Hutchison Australia	Voting	Brian Currie
Vodafone Hutchison Australia	Non-voting	Alexander R. Osborne

This Working Committee was chaired by Alexander R. Osborne. James Duck of Communications Alliance provided project management support.

Communications Alliance was formed in 2006 to provide a unified voice for the Australian communications industry and to lead it into the next generation of converging networks, technologies and services.

In pursuing its goals, Communications Alliance offers a forum for the industry to make coherent and constructive contributions to policy development and debate.

Communications Alliance seeks to facilitate open, effective and ethical competition between service providers while ensuring efficient, safe operation of networks, the provision of innovative services and the enhancement of consumer outcomes.

It is committed to the achievement of the policy objective of the *Telecommunications Act 1997* - the greatest practicable use of industry self-regulation without imposing undue financial and administrative burdens on industry.



**Published by:
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