

4 July 2006

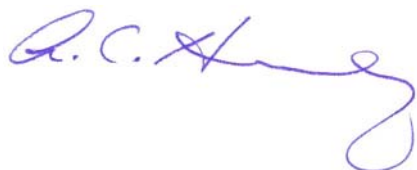
Australian Communications and Media Authority
Soheil Derakhshan
Manager
Community and National Interests Section
Australian Communications and Media Authority
PO Box 13112 Law Courts
Melbourne VIC 8010

Dear Soheil

Re: Emergency Call Service and Voice over Internet Protocol (VoIP) Services

Communications Alliance is pleased to have this opportunity to provide comments to the Australian Communications and Media Authority on the Draft *Telecommunications (Emergency Call Service) Amendment Determination 2007*.

Yours sincerely,



Anne Hurley
Chief Executive Officer
Communications Alliance

Emergency Call Service and Voice over Internet Protocol (VoIP) Services Consultation Paper Submission by Communications Alliance

1. Introduction

Communications Alliance is pleased to have this opportunity to make a submission to the Emergency Call Service and Voice over Internet Protocol (VoIP) Services Consultation Paper.

Communications Alliance was formed to provide a unified voice for the Australian communications industry and to lead it into the next generation of converging networks, technologies and services. Its membership is drawn from a wide cross-section of the communications industry, including service providers, vendors, consultants and suppliers as well as business and consumer groups.

The ACMA Consultation Paper seeks submissions on the proposed changes to the *Telecommunications (Emergency Call Service) Amendment Determination 2002* to clarify that the Determination applies to two-way and dial-out Voice over Internet Protocol (VoIP) services, and that providers of such services must provide access to the emergency call service.

Communications Alliance's submission draws together a number of comments received from individual stakeholders. It does not attempt to represent a consensus view of the industry as a whole. Rather, it is being provided to AMCA to assist in their considerations of the proposed changes to the Determination.

2. GENERAL - Definitions

Communications Alliance encourages ACMA to review the application of terms 'Location Independent Communications Service' and 'nomadicity' to VoIP services which can use either geographic or 0550 numbers.

The ACIF G629:2006 ***Interim VoIP Location Indicator for Emergency Services Signalling Specification*** and ACIF G557:2007 ***Standardised Mobile Service Area and Industry Guideline Location Indicator Register*** use the term "nomadic services" for VoIP services. Consideration needs to be given for consistency between the terms 'Location Independent Communications Service' and 'nomadic service'.

In addition, the Determination's explanatory statement would benefit by including more information for the reader on how the Emergency Services Determination applies to VoIP services provided via mobile and satellite networks. This would provide the service provider with greater clarity on their obligations in offering VoIP services via different networks.

3. Amendment 3 – Section 17A

Communications Alliance understands that there are technical limitations with VoIP services supporting the use of teletypewriters (TTYs), including accessing the 106 Emergency Call Operator.

The level of support will vary depending on the implementation of the VoIP service. The capability of the service can range from no teletypewriter support at all to support that is dependant on factors such as if the service is being used nomadically.

It has also been raised in recent Communications Alliance VoIP committee discussions that the arrangements between Telstra and the Australian Communications Exchange for handling calls to the 106 emergency call operators have changed and these changes need to be taken into account.

The obligations of a service provider in providing access to the 106 Emergency Call Operator needs to be clarified in the Determination.

4. Amendment 10 - Subsection 30(4)(a)

Communications Alliance suggests that instead of the change proposed in the consultation draft to read:

“known as Industry Specification ACIF G530:1999 **Mobile Location Indicator for Emergency Services - Stage 1 Service Description for Interim Mobile Location Indicator** and Industry Guideline ACIF G557:2007 **Standardised Mobile Service Area and Location Indicator Register**, as in force from time to time; and...”

Subsection 30(4)(a) should read:

“known as Industry Guideline ACIF G557:2007 **Standardised Mobile Service Area and Location Indicator Register**, as in force from time to time; and”

In other words, to omit the reference to ACIF G530:1999.

As a result of the above suggested change, Communications Alliance suggests that instead of the accompanying Note to Subsection 30(4) proposed in the consultation draft to read:

“Note Industry Specification ACIF G530:1999 **Mobile Location Indicator for Emergency Services - Stage 1 Service Description for Interim Mobile Location Indicator** ACIF G557:2007 **Standardised Mobile Service Area** and Industry Guideline **Location Indicator Register** are available from Communications Alliance Limited.”

the Note to Subsection 30(4) should read:

“Note Industry Guideline ACIF G557:2007 **Standardised Mobile Service Area and Location Indicator Register** is available from Communications Alliance Limited.”

Reasons:

1. ACIF G557:2007 is the current industry reference for Standardised Mobile Service Area (SMSA) and Location Indicator Codes for fixed, mobile and nomadic services. Therefore it is appropriate to reference it in the consultation draft Telecommunication (Emergency Call Service) Amendment Determination 2007.
2. To continue to refer to ACIF G530:1999 in the Telecommunication (Emergency Call Service) Determination is inappropriate. This is because:
 - (i) ACIF G530:1999 predated both the first version of ACIF G557:1999 and also ACIF G549:2000 **Interconnection Implementation** Plan, so the ACA referenced

ACIF G530:1999 at the time of the original Telecommunications (Emergency Call Service) Determination.

- (ii) the information in ACIF G557:1999 and ACIF G549:2000 supersedes ACIF G530:1999.
- (iii) ACIF reconfirmed ACIF G530:1999 in 2006 because at the time the Emergency Call Service Determination referenced it. Otherwise, it is likely that ACIF G530:1999 would have been withdrawn by ACIF because it had been superseded by ACIF G557:1999 and ACIF G549:2000, and ACIF G557:1999 subsequently by ACIF G557:2002.

Please note that if ACMA believes there is a need to retain a reference to a document in Subsection 30(4)(a) with details of the technology specific I-ISUP signalling information then a more appropriate reference than ACIF G530:1999 might be 'ACIF G549:2000 Interconnection Implementation Plan'.

Communications Alliance understands that no carrier or carriage service provider in Australia has implemented the subsequent version of ACIF G549:2000 i.e. the specification ACIF G549:2002 Interconnection Implementation.

5. Amendment 10 - Subsection 30(4A)(a)

Communications Alliance suggests that instead of the change proposed in the consultation draft to read:

"known as Industry Specification ACIF G629:2006 Interim **VoIP Location Indicator for Emergency Services Signalling Specification** and Industry Guideline ACIF G557:2007 **Standardised Mobile Service Area and Location Indicator Register**, as in force from time to time; and"

The subsection 30(4A) (a) should read:

"known as Industry Guideline ACIF G557:2007 **Standardised Mobile Service Area and Location Indicator Register**, as in force from time to time; and"

In other words, to omit the reference to ACIF G629:2006.

As a result of the above suggested change, Communications Alliance suggests that instead of the accompanying Note to Subsection 30(4A) proposed in the consultation draft to read:

"Note Industry Specification ACIF G629:2006 **Interim VoIP Location Indicator for Emergency Services Signalling Specification** and ACIF G557:2007 **Standardised Mobile Service Area and Industry Guideline Location Indicator Register** are available from Communications Alliance Limited."

The Note to subsection 30(4A) should read:

"Note Industry Guideline ACIF G557:2007 **Standardised Mobile Service Area and Location Indicator Register** is available from Communications Alliance Limited."

Reasons:

1. ACIF G557:2007 is the current industry reference for Standardised Mobile Service Area (SMSA) and Location Indicator Codes for fixed, mobile and nomadic services.

Therefore it is appropriate to reference it in the consultation draft Telecommunication (Emergency Call Service) Amendment Determination 2007.

2. To reference ACIF G629:2006 in the Telecommunication (Emergency Call Service) Determination is inappropriate. This is because the address structures in ACIF G629:2006 are derived from ACIF G549 (Note 1 to clause 3.2.2 of ACIF G629:2006). If ACMA believes there is a need to retain a reference to a document in Subsection 30(4A)(a) with details of the technology specific I-SUP signalling information then a more appropriate reference than ACIF G629:2006 might be ACIF G549:2000 Interconnection Implementation Plan.

6. Amendment 10 - Section 30 (4A)

The ACIF G629:2006 **Interim VoIP Location Indicator for Emergency Services Signalling Specification** defines the caller location information to be provided to the ECP by a VoIP Service provider by incorporating the correct 'ABC' code. It needs to be recognised in the Determination that VoIP service providers may not be able to determine where the caller is located for a VOIP service due to its nomadcity and that the national '980' indicator of a VOIP is the applicable code. The Determination needs to allow for Service Providers to be able follow the ACIF G629 Specification within the limitations of the service being provided.

7. IPND

Communications Alliance wishes to confirm to ACMA that the ACIF C555:2007 **Integrated Public Number Database (IPND)** Industry Code and the ACIF G619:2007 **IPND Data** Industry Guideline support the requirement where Data Providers must identify, by the use of an alternate address flag, those services where the service address provided may not be the physical address from where the customer is calling.

8. Communications Alliance factsheets

Communications Alliance wishes to inform ACMA that the Communications Alliance VoIP factsheets will be updated to align with any changes arising from the review of the *Telecommunications (Emergency Call Service) Amendment Determination 2007* once the revised Determination has been legislated.