

Optus Public Comments via email

Further to my email of 24/8/20 below, Optus has another public comment on CA DR C536:2020 Emergency Call Service Requirements Industry Code.

Optus gets regular requests from it's Wholesale CSPs as well as from large Enterprise customers about the testing arrangements for Emergency Calls with the ECP whenever either the CSPs deploy new voice telephony services or the Enterprise customers deploy new PABX equipment.

Accordingly, Optus believes that it would be useful to provide some guidance info in the Code from the ECP to address such queries.

This could be based upon the info in the S042.1 CE Standard under the testing arrangements section for CE Suppliers and Test Houses.

Best Regards,

**Sanjeev Mangar**  
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Hi Craig,

Optus supports the 2020 update of the CA C536 Emergency Call Service Requirements Code and has contributed to this Code update as a member of CA WC86.

However, Optus **does not agree** with the ACMA's proposal to delete Note 1 under Clause 4.6.1 and to replace it from the voluntary '*Carriers and CSPs should make information available...*' text, to a new Code clause mandating that '*Carriers and CSPs must make information available to the community on a 24 x 7 basis when they become aware of a Significant Network Outage in their network(s) which impacts access to the ECS*'.

As advised previously in CA WC86 meetings, Optus position is that:

- There is no rationale or justification provided by the ACMA for this proposal.
- Changing Note 1 to a mandatory Code clause is a major change to the current arrangements which will impact all Carriers & CSPs (both large and small) who provide an ETS to access the ECS.
- Such notifications are currently done by Optus on a voluntary and best efforts basis. Changing Note 1 to a mandatory Code clause will have a significant impact on Optus, including the need to have 24x7 support for updating Optus website information on a 24x7 basis.
- Note 1 needs to remain unchanged as a voluntary requirement as in the previous version of this Code.

Best Regards,

**Sanjeev Mangar**  
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