

3 December 2010

Peter Sutton  
Manager, National and Community Interests  
Australian Communications and Media Authority

By email: [EmergencyCallServices@acma.gov.au](mailto:EmergencyCallServices@acma.gov.au)

Dear Peter

**Re: Enhanced mobile location information for the Emergency Call Service  
ACMA consultation on the draft Telecommunications (Emergency Call Service) Amendment  
Determination 2010 (Draft Amendments)**

The Australian Mobile Telecommunications Association (AMTA) and Communications Alliance (the Associations) welcome the opportunity to provide comment on the draft amendments to the Telecommunications (Emergency Call Service) Determination 2009.

The Associations acknowledge and support the ACMA's proposal to put in place a regulatory solution to require mobile carriers to provide location information on request (a 'pull' model), while continuing to explore with industry and emergency service organisations the potential implementation of a 'push' model.

Industry supports the objectives of the revised Determination to require Carriers to:

- provide the most precise location information they have available on request from an emergency service organisation and, as a minimum, the reception or coverage areas of the radio cell from which the emergency call originates;
- resolve emergency call location queries with the highest possible priority and without delay;
- ensure emergency service organisations are provided with a designated contact point and telephone number for location queries, or have a specified process for location queries; and
- assist an emergency service organisation to identify the relevant mobile network carrying the emergency call.

The Associations note that the Carriers will be making changes to their existing 'police life threatening call' processes to enable them to provide the location information required. As such, Emergency Service Organisations (ESOs) will not enjoy consistency across the three Carriers; there will be three different processes. ESOs will also need to determine which carrier to send a location query to.

ESOs must also be cognisant of the model's limitations. It will not work with queries performed on national roamers, international roamers and IMSI-less handsets which would all present a default Caller Line Identification (CLI) to the Emergency Service Organisation (ESO). Critically, ESOs must be disciplined in their requests, ensuring information is sought only when absolutely necessary. Requesting location information 'just in case', rather than only when it is absolutely necessary to do so (i.e. when an individual is unable to communicate their location), would risk systems collapse and

potentially prevent location information being provided about those consumers most in need of assistance.

In regard to the requirement that ESOs are provided with a designated contact point, industry offers ESOs access to the industry contact list for 'Life Threatening Communications', maintained on its website by Communications Alliance.

The industry looks forward to continuing to work with the ACMA on the potential implementation of a longer term 'push' model. In the interim, thank you for the opportunity to comment on the interim solution, and please do not hesitate to contact either Peppi Wilson, Policy Manager, AMTA ([peppi.wilson@amta.org.au](mailto:peppi.wilson@amta.org.au)) or James Duck, Project Manager, Communications Alliance ([j.duck@commsalliance.com.au](mailto:j.duck@commsalliance.com.au)) with any questions.

Yours sincerely

Peppi Wilson

Manager, Policy  
Australian Mobile Telecommunications Association.