



DR C536:2020 Emergency Call Service Requirements Incorporating Variation No.1/2025 Industry Code

13 May 2025

Recommendations

This Submission recommends Communications Alliance:

1. Require built in consultation with consumer organisations.
2. Require quarterly reporting on emergency call metrics and annual audits, published in summary form.
3. Provide emergency call information in accessible formats and First Nations languages.
4. Align with the 2024 ACMA Outage Standard and support the ACMA to develop a real-time, public outage database.
5. Restore TIO referral for complaints and require CSPs to cooperate with investigations.

About this submission

The Australian Communications Consumer Action Network (ACCAN) is pleased to provide this submission to Communications Alliance on proposed amendments to DR C536:2020 Emergency Call Service Requirements Incorporating Variation No.1/2025 Industry Code (the Code).

ACCAN supports the proposed changes to the Code, which aim to enhance public communication, improve the resilience of emergency call handling, and ensure information is accessible to all consumers. As set out in this submission, ACCAN considers that Communications Alliance could further strengthen the Code by enhancing consumer protections, improving accessibility provisions, and increasing transparency through more robust reporting requirements.

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Australian Communications Consumer Action Network

ACCAN is the peak national consumer advocacy organisation for communications working to achieve trusted, accessible, inclusive, affordable and available communications and digital services for all Australians.

Introduction

ACCAN welcomes the opportunity to comment on the proposed variations to the Code. As Australia's peak body representing communications consumers, we recognise the critical role this Code plays in ensuring timely and reliable access to emergency services.

ACCAN's submission outlines a series of recommendations aimed at strengthening consumer protections, improving transparency and accountability, and ensuring the Code reflects the diverse needs of all Australians, including people with disability, First Nations communities, regional, rural, and remote (RRR) populations, and those experiencing financial hardship. These recommendations include restoring independent complaint pathways, improving outage reporting, mandating accessible communications, and reinforcing obligations around network reliability. Embedding consumer voices, through consumer consultation, is central to ensuring that the emergency call system remains robust, inclusive, and fit for purpose.

Overarching comments

Inclusion of consumer advocacy representation on the Working Committee

ACCAN recommends that future revisions of the Code require built in consultation with consumer organisations as highlighted in section 1.1.2.[1] Given that one of the objectives of the Code is to ensure all end users of an Emergency Telephone Service have access to the emergency call service (ECS) in case of emergencies, effective consumer representation ensures that the interests, experiences, and needs of communications consumers, particularly those from vulnerable or disadvantaged groups, are directly reflected in developing and revising ECS requirements. Incorporating consumer perspectives early in the process can enhance the Code's relevance and effectiveness for consumers, ultimately improving outcomes and promoting greater trust and confidence in Australia's emergency communications framework.

Improving transparency and accountability in ECS performance

ACCAN recommends that Communications Alliance include a clause in the Code requiring Carriers and Carriage Service Providers (CSPs) to publish quarterly reports on key performance metrics related to ECS. These reports should include the call success rate to the Emergency Call Person (ECP), the average time taken to route calls to the relevant Emergency Service Organisation (ESO), and detailed information on the number, duration, and location of any ECS outages.

This recommendation would better align the Code with the Bean Review's call for real-time outage reporting, enabling consumers to more easily understand and compare the reliability of different networks.[2]

[1] Communications Alliance, Draft for public comment: DR C536:2020 Emergency Call Service Requirements Incorporating Variation No.1/2025 Industry Code (Consultation paper, April 2025) 2.

[2] Richard Bean, Review into the Optus Outage of 8 November 2023 (Final Report, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, March 2024) 9.

Considering the significant impacts of the Optus outage, ACCAN also recommends that the Code require an annual external audit of each provider's compliance with ECS obligations. The results of these audits should be submitted to the Australian Communications and Media Authority (ACMA) and published in summary form. This additional layer of oversight would enhance transparency and strengthen public trust in the delivery of critical communications services.

Enhancing accessibility and information for National Relay Service users

ACCAN recommends strengthening the Code's provisions to better support consumers who use the National Relay Service (NRS) to make emergency calls. This includes greater transparency in reporting on access issues and outages specific to NRS-supported emergency communications. Section 4.5 of the Code, which outlines customer information obligations, should require that all mandatory ECS information is made available in accessible formats.^[3] This includes Easy English, Auslan, large print, and braille (on request). Such measures are essential to ensure that all consumers can understand and access life-saving information.

ACCAN further recommends that the Code include an obligation for providers to update public information within 30 days of any changes to network technology that may impact access to emergency services. In addition, providers should be required to actively promote the free Emergency + App, particularly at point-of-sale locations such as retail stores where prepaid SIM cards are sold, to ensure broader public awareness.^[4]

Finally, the Code should clarify that emergency calls made by NRS users through all available channels, including Captioned Telephony and other non-Teletypewriter (TTY) methods, are free of charge. This clarification is critical to eliminate confusion and ensure equitable access to emergency services for people with disability.

Supporting First Nations and regional, rural, and remote consumers

ACCAN recommends that the Code be strengthened to better reflect the unique emergency communication needs of RRR Australians and First Nations communities, where connectivity challenges and infrastructure limitations can significantly impact access to emergency services. These measures are essential to upholding equitable access to emergency communications across all Australian communities, and to ensuring that the Code reflects the reality of service delivery in RRR and underserved regions.

Advanced Mobile Location - Advanced Mobile Location (AML) has been fully rolled out across Australia since August 2021 and plays a critical role in improving location accuracy for emergency services.^[5] The Code should explicitly reference AML and require Carriers to ensure that AML messages are delivered in all circumstances, including when calls are routed via satellite repeaters or through alternative technologies in low-coverage areas. Additionally, consumer education on AML functionality and its limitations should be developed for Australian consumers.

[3] Communications Alliance, Draft for public comment: DR C536:2020 Emergency Call Service Requirements Incorporating Variation No.1/2025 Industry Code (Consultation paper, April 2025) 15.

[4] Communications Alliance, Draft for public comment: DR C536:2020 Emergency Call Service Requirements Incorporating Variation No.1/2025 Industry Code (Consultation paper, April 2025) 22.

[5] Department of Home Affairs, 'Advanced Mobile Location', Triple Zero (Web Page, 22 September 2024) <<https://www.triplezero.gov.au/triple-zero/How-to-Call-000/advanced-mobile-location>>.

Payphones - Currently, the Code at section 1.3.4 states that it does not apply to privately operated payphones, many of which are located in remote First Nations communities.[6] ACCAN recommends removing this exemption to ensure these payphones are also subject to the Code's requirements, particularly around emergency service access and information provision.[7]

Accessible Information in First Nations Languages - Section 4.5 Publicity and Customer Information of the Code, which addresses customer information obligations, should be strengthened to require that all mandatory ECS information is made available in First Nations languages relevant to a CSP's service footprint.[8] This will ensure critical safety information is culturally and linguistically inclusive, particularly for communities where English is not the first language.

Outage communications and alignment with the new ACMA Standard

The proposed variation removes the obligation for Carriers and CSPs to report outages to the ACMA, citing the introduction of the Telecommunications (Customer Communications for Outages) Industry Standard 2024 (Cth) (the Standard) as the rationale for avoiding duplication. ACCAN supports efforts to streamline regulatory requirements. However, it is essential that the Code maintains clarity and consistency with the Standard.

To this end, the Code should explicitly cross-reference the Standard and clearly state that any outage report submitted in compliance with the Standard satisfies any residual obligations under the Code. This clarification will ensure coherence between regulatory instruments and avoid confusion for both providers and oversight bodies.

Moreover, ACCAN recommends that the Code include a requirement for Carriers to proactively share real-time outage information with key stakeholders, including consumer advocacy organisations and essential community service providers such as the Royal Flying Doctor Service, state and territory emergency services, and local government disaster response units. Timely access to accurate outage data enables these organisations to better coordinate emergency responses and support consumers, particularly in RRR and vulnerable communities, during service disruptions.

In addition, ACCAN supports the establishment of a national, publicly accessible database of communications outages, administered by an independent body such as the ACMA. This database should aggregate real-time and historical outage data across providers and technologies, allowing consumers, researchers, and community organisations to track service reliability, identify systemic issues, and plan appropriately for future disruptions. A national communications outage database would greatly enhance transparency, promote accountability, and help build public confidence in Australia's communications infrastructure.

[6]ACCAN, Better delivery of universal services (Policy submission, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 8 March 2024) 21.

[7] Communications Alliance, Draft for public comment: DR C536:2020 Emergency Call Service Requirements Incorporating Variation No.1/2025 Industry Code (Consultation paper, April 2025) 3.

[8] Communications Alliance, Draft for public comment: DR C536:2020 Emergency Call Service Requirements Incorporating Variation No.1/2025 Industry Code (Consultation paper, April 2025) 15.

International Emergency Assistance Call Monitoring Centres

ACCAN welcomes the inclusion of Section 3.3, which acknowledges the role of International Emergency Assistance Call Monitoring Centres (IEACMCs).[9] To ensure strong consumer protections and service reliability, ACCAN recommends that the Code be strengthened to require IEACMCs, or their Australian Transit CSP, to comply with Australian privacy legislation, with all call-related data stored onshore unless explicitly approved otherwise.

In addition, IEACMCs should be required to offer translation and relay services that are functionally equivalent to those available domestically, to ensure equal access for people with disability and culturally and linguistically diverse communities. To safeguard emergency response quality, the Code should also mandate that any IEACMC undergo proof-of-concept testing with Australian ESOs prior to activation. This testing must confirm that the centre can accurately route calls, transmit location data, and meet Australian service standards.

These measures are essential to ensure that emergency calls routed internationally maintain the same standards of privacy, accessibility, and reliability expected within Australia.

Device blocking and the 3G network shutdown

Clause 4.5.1(h) requires CSPs to cease supplying services to devices that cannot call Triple Zero (000).[10] While ACCAN supports this measure to protect consumer safety, additional safeguards are needed to ensure users are not left without access to emergency services.

ACCAN recommends any customer identified as having a device that cannot call Triple Zero should be prioritised and if eligible due to their vulnerabilities, be immediately offered a free or subsidised replacement handset.

This is particularly critical for Centrelink recipients and those living in remote or First Nations communities, who face higher risks due to limited access to alternative communications options. The Code should also require CSPs to report to the ACMA on the number of services blocked and the support measures provided. These steps will help prevent digital exclusion and ensure a fair and safe transition for consumers affected by the shutdown of the 3G network.

Reintroducing independent escalation pathways

The 2020 review removed clause 1.6, which referenced the Telecommunications Industry Ombudsman (TIO) referral powers.[11] ACCAN recommends establishing an explicit provision directing consumers to the TIO if they are dissatisfied with a provider's handling of an emergency-call-related complaint.

The Code should also require CSPs to cooperate fully with TIO investigations. This would restore a clear, independent escalation pathway and strengthen accountability in emergency service delivery.

[9] Communications Alliance, Draft for public comment: DR C536:2020 Emergency Call Service Requirements Incorporating Variation No.1/2025 Industry Code (Consultation paper, April 2025) 13.

[10] Communications Alliance, Draft for public comment: DR C536:2020 Emergency Call Service Requirements Incorporating Variation No.1/2025 Industry Code (Consultation paper, April 2025) 16.

[11] Communications Alliance, Draft for public comment: DR C536:2020 Emergency Call Service Requirements Incorporating Variation No.1/2025 Industry Code (Consultation paper, April 2025) ii.

Conclusion

ECS are a critical lifeline, and the Code must uphold the highest standards of accessibility, reliability, and consumer protection. The proposed updates represent an important opportunity to strengthen the framework in line with community expectations and emerging challenges, such as technological transitions and natural disasters.

By embedding stronger transparency measures, mandating inclusive practices, and restoring independent oversight, the Code can better serve all Australians, particularly those most at risk of digital exclusion. ACCAN urges Communications Alliance to adopt these recommendations to ensure that the emergency call system remains resilient, responsive, and equitable for every consumer. We thank Communications Alliance for the opportunity to comment on the Code. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact Dr Amelia Radke, Senior Policy Adviser, at amelia.radke@accan.org.au.

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