

# Contacting Emergency Services via SIMless phones



Currently, people in Australia are able to contact the emergency call service (Triple Zero) from an inactive mobile service or from a SIMless handset. Prior to detailing our stance on this topic, we acknowledge that due to the technological limitations of SIMless calls, it is unlikely that many individuals would attempt to genuinely contact Triple Zero using a SIMless phone if they had another viable alternative. We believe that SIMless phones would be used predominantly in instances where there is no alternative available, due to the nature of the emergency, a person's lack of technological understanding, or a person's inability to access or afford fully-functional telecommunication devices. It is therefore ACCAN's position that people should be able to use SIMless phones to genuinely contact the emergency call service as needed.

As there is no telephone number or consumer information associated with a SIMless device, it is not possible to obtain location information about these callers. However, it is ACCAN's understanding that there are other types of calls that offer limited location and caller information, and that these are still able to be used to contact Triple Zero. Indeed, some of these calls, such as international mobile roaming calls from within Australia and camp on calls, are difficult for some mobile networks to distinguish from SIMless calls.<sup>1</sup> Camp on calls in particular, in which a call uses another carrier's network to connect to the emergency call service,<sup>2</sup> may frequently be genuine attempts to contact Triple Zero. Genuine attempts to contact Triple Zero must always be allowed through to the Emergency Call Persons.

Recently suggested technological upgrades (SIP signalling) may make it possible to identify and prevent SIMless calls from connecting to the emergency call service, while continuing to allow access for international mobile roaming calls made within Australia, as well as camp on calls.<sup>3</sup> Despite these advances and the increased ability to differentiate between different call types, ACCAN believes that SIMless calls should continue to be allowed to access the emergency call services, as there remains a possibility that a proportion of these calls will be genuine calls for emergency assistance.

Above all, safety must be protected by ensuring that people have unfettered access to the emergency call service. ACCAN does not support denying anyone access to emergency

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<sup>1</sup> As detailed in the November 2018 AMTA/CA submission to the ACMA's Review of the ECS Determination, p14.

<sup>2</sup> As detailed in the ACMA Review of the ECS Determination – Consultation Paper 2018, p10.

<sup>3</sup> ACMA Review of the ECS Determination – Consultation Paper 2018, p10; see also AMTA/CA submission to the ACMA's Review of the ECS Determination, p14.

services. We believe that people must be able to contact the emergency call service by a variety of ways, such as via SMS, web or video chat, instant messages, and from SIMless phones. SIMless phones may be used to make genuine calls to Triple Zero in a variety of circumstances. For instance, an individual's mobile and/or SIM may have sustained significant damage in an accident; a robbery may have left someone with no communications technology except for an old, SIMless handset in the back of their drawer; or an older person who until recently relied on a copper landline telephone service, and who cannot afford a mobile phone, may be given a SIMless phone to use should they require emergency support during a power outage.

Although we understand the impetus to minimise non-genuine calls to Triple Zero, more research needs to be performed to consider whether mobiles without SIMs actually represent a high proportion of all hoax calls made to the emergency call service. ACCAN's understanding is that statistics on hoax calls to the emergency call service do not currently differentiate between genuine and non-genuine SIMless calls, camped on calls and international mobile roaming calls, due to the difficulty in singling out and identifying these separate call types. Research should therefore focus on how many genuine SIMless calls are made to Triple Zero, compared with non-genuine calls. These should be clearly differentiated from genuine and non-genuine camped on and/or international mobile roaming calls.

Maintaining the existing ways through which people can seek assistance, in addition to increasing the contact options available, will help to ensure that all people, including people with disability, have consistent and appropriate access to Triple Zero and emergency services. Everyone should be ensured universal access to the essential emergency call services available in Australia, through whichever means is most accessible and available to them.