
Submission

31 May 2024

Committee Secretary
Senate Standing Committees on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
Canberra ACT 2600

Re: Inquiry into the shutdown of the 3G mobile network and telecommunications services accessibility

The Australian Communications Consumer Action Network (**ACCAN**) thanks the Senate Standing Committees on Rural and Regional Affairs and Transport (**the Committee**) for the opportunity to comment on the inquiry into the shutdown of the 3G mobile network and telecommunications services accessibility (**the Inquiry**).

ACCAN is the peak body that represents consumers on communications issues including telecommunications, broadband, and emerging new services. ACCAN provides a strong unified voice to industry and government as we work towards communications services that are trusted, inclusive and available for all.

The impending shutdown of the 3G mobile network represents a significant technological transition to newer and more efficient next-generation connectivity. While necessary, this transition may pose challenges for consumers who are reliant on the 3G mobile network.

ACCAN has heard from communications consumers and stakeholders that there has been a lack of clear and appropriate information on how they can transition safely and smoothly to newer networks. ACCAN recommends the Committee:

- Develop ongoing support mechanisms for consumers and small businesses post-3G shutdown, including financial grants and a coordinated communications campaign.
- Investigate how future technological transitions can learn from the 3G mobile network shutdown to ensure consumers are provided with adequate and appropriate information.
- Explore how mobile networks can be incorporated into Australia's universal service obligation (**USO**).

For more detailed feedback on specific questions regarding the Inquiry, see **Attachment A**.

This submission was developed in consultation with Cotton Australia, National Rural Health Alliance, Regional Development Australia Northern Territory, and the Regional Tech Hub.

We thank the Committee for the opportunity to comment on the Inquiry. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact me at amelia.radke@accan.org.au.

Yours sincerely,

Dr Amelia Radke
Senior Policy Adviser

The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers. ACCAN is committed to reconciliation that acknowledges Australia's past and values the unique culture and heritage of Aboriginal and Torres Strait Islander peoples. [Read our RAP.](#)

Attachment A

The impact on access to triple zero emergency calls

ACCAN is aware that some devices, such as 3G devices and older 4G handsets without Voice over LTE (VoLTE), will be unable to make emergency calls to triple zero after the 3G mobile network shuts down. Stakeholders have raised concerns about whether people living in regional, rural, and remote (RRR) areas, who currently only have access to 3G, will have adequate mobile network coverage to make emergency calls to triple zero after the shutdown.

ACCAN stakeholders have highlighted the necessity for communication strategies to convey the impact of the 3G shutdown on accessing triple zero emergency calls. This may involve establishing a dedicated information channel, providing clear assurances regarding coverage, and governance oversight through the Triple Zero Custodian framework.¹ Stakeholders have particularly emphasised the importance of ensuring reliable connectivity, especially in RRR areas, as a top priority. Therefore, ACCAN recommends the Committee:

- Undertake a nation-wide media campaign on the impact of the 3G shutdown on accessing triple zero calls that provides clear and concise information on the devices impacted.
- Work alongside community organisations, Services Australia, and local government authorities to undertake welfare checks on vulnerable populations to ensure they have access to the 4G and 5G network, along with compatible devices.
- Support a nation-wide, free phone number which consumers can text or call to find out if their devices will be impacted by the 3G mobile network shutdown.

These recommendations reflect the advice from ACCAN's stakeholders who have emphasised that access to triple zero emergency calls is an essential and vital service for everyone in Australia irrespective of where they live.

The number of devices and customers affected by the shutdown

ACCAN notes with concern that there is a general lack of information from an independent authority on the number of devices and customer that will be affected by the shutdown. It is estimated that there are approximately three million devices that currently rely on 3G technology in Australia. These devices may include phones, EFTPOS machines, cars, tablets, security cameras, farming equipment, and medical-alert technology.² Furthermore, ACCAN has seen reports indicating that up to a million older 4G handsets will be unable to call triple zero due to their use of legacy 3G networks.³

¹ Minister for Communications (Cth), 'Improving the governance and performance of Triple Zero' (Media Release, 30 April 2024).

² David Swan, 'Concerns for triple-zero services amid 3G shutdown' (The Sydney Morning Herald, 17 March 2024) <<https://www.smh.com.au/technology/concerns-for-triple-zero-services-amid-3g-shutdown-20240315-p5fcse.html>>; Jane Norman, 'More than a million older 4G mobile phones at risk of being blocked from making triple-0 calls in 3G shutdown' (ABC news, 8 April 2024) <<https://www.abc.net.au/news/2024-04-08/million-iphone-android-devices-caught-out-3g-shutdown/103673864>>.

³ Jane Norman, 'More than a million older 4G mobile phones at risk of being blocked from making triple-0 calls in 3G shutdown' (ABC news, 8 April 2024) <<https://www.abc.net.au/news/2024-04-08/million-iphone-android-devices-caught-out-3g-shutdown/103673864>>.

ACCAN's stakeholders urge the Committee to consider the number of consumers impacted by the 3G shutdown rather than the number of devices. This distinction is important, as people may have multiple phones and devices that are 3G-only compatible but are not in use. ACCAN recommends the Committee:

- Undertake analysis and publicly disclose the number of consumers currently affected by the 3G shutdown, and to gather similarly useful data in advance of any future shutdown of next-generation networks.

Determining the number of people and types of devices affected is essential to fostering consumer confidence in future transitions to newer technologies such as 5G and 6G.

The absence of 4G services in rural and regional areas previously covered by 3G

ACCAN notes that some RRR areas have received incidental 3G coverage and may not have access to equivalent 4G or 5G mobile coverage after the 3G shutdown. ACCAN notes that some of these areas are not included in official coverage maps and communications consumers may have no recourse to have equivalent mobile coverage after the shutdown.⁴

Furthermore, ACCAN stakeholders have stated the need for ongoing consumer support in RRR areas in accessing information post-3G shutdown. In particular, stakeholders emphasised the importance of providing support for First Nations consumers, people with disabilities, culturally and linguistically diverse communities, older Australians, and low-income consumers in accessing information after the shutdown. Additionally, ACCAN supports the use of alternative services that meet minimum standards as part of or in alignment with a modernised USO.⁵ ACCAN recommends the Committee:

- Provide ongoing funding to the Regional Tech Hub to support communications consumers in RRR areas that were previously covered by 3G.
- Create a communication avenue to provide information to consumers post-3G shutdown, using multiple communication channels.
- Investigate whether grants and other financial avenues can be used to support communications consumers access alternative technologies, such as LEOsats.

Ensuring consumers are supported after the 3G shutdown will reduce the severity of disruptions for those who live and work in areas that were previously covered by the 3G mobile network.

The impact on elderly and health-compromised Australians who use medical alert devices on the 3G network

It is estimated that approximately 200,000 medical alert devices rely on Australia's 3G mobile network.⁶ ACCAN stakeholders highlighted how many equipment suppliers have been actively

⁴ Emily Middleton, 'Shutdown of 3G networks a 'health and safety issue' for some regional Australians' (Guardian Australia, 24 March 2024) <<https://www.theguardian.com/australia-news/2024/mar/24/shutdown-of-3g-networks-a-health-and-safety-issue-for-some-regional-australians>>.

⁵ ACCAN, 'Better Delivery of Universal Services' (Submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 8 March 2024).

⁶ Daniel Jeffrey, 'Australia's 3G network is shutting down. This is what you need to know' (Nine News, 6 May 2024) <<https://www.9news.com.au/technology/3g-network-shutdown-australia-when-does-it-happen-who-does-it-affect-telstra-optus-vodafone-explained/499635b2-f49d-4ba5-8aa8->

informing their customers about replacing their equipment if it will no longer work after the 3G shutdown. However, ACCAN is concerned about the lack of communication from manufacturers and sellers of unregistered devices about how the 3G shutdown may impact their equipment. Furthermore, ACCAN recommends the Committee:

- Investigate if grants and financial support can be provided to vulnerable consumers to upgrade their devices.

Additionally, ACCAN stakeholders noted that access to telehealth is vital, especially for elderly and health-compromised Australians living in RRR areas. The shutdown's impact on access to increasingly digitised services like My Health Record, Medicare, and telehealth could be significant. ACCAN recommends that the Committee further:

- Explores how the 3G shutdown could impact elderly and health-compromised Australians access to digital health services throughout Australia.

The impact on industries that use 3G devices

The shutdown of the 3G mobile network is expected to have significant implications for industries and small businesses that rely on 3G devices. The extent of its impact on these industries and small businesses will depend on their reliance on 3G technology, the availability of alternative connectivity options, and their readiness to transition to new network technologies. These industries include but are not limited to industries utilising the Internet of Things (IoT), healthcare, utilities, automotive, security and alarm systems, retail and payment systems, ag-tech companies, and RRR businesses.

ACCAN stakeholders further noted that small businesses need additional support to understand what devices may be impacted by the 3G shutdown and the unintended consequences of not upgrading devices. ACCAN stakeholders also stressed the importance of device suppliers providing clear information to customers about impacted devices, along with the need for provide financial support to help with upgrading devices. ACCAN recommends the Committee:

- Investigate if grants and financial support can be provided to small businesses to support the upgrading of their devices.

Supporting industries and small businesses impacted by the 3G shutdown is integral to navigating the unintended consequences of this technological transition for Australia's economy.

The impact of a lack of telecommunications services on the economic and social circumstances of those who live in regional Australia

A lack of communications services would impact the economic and social circumstances of those living in RRR Australia. For instance, a lack of communications services would make operating businesses more difficult and costly, and it may reduce economic productivity. A lack of communications services may also impact consumers' daily lives, by limiting their ability to access

education and healthcare services, while also potentially increasing social isolation and reducing overall quality of life in RRR Australia.⁷

ACCAN stakeholders also noted that inadequate communications services in RRR businesses can impact workforce attraction and retention. For example, employees on RRR farms may change employer for decent communications signal to better connect with family and friends, along with services. ACCAN advises the Committee:

- Consider what support is required to assist those who are financially disadvantaged to access communications services.

Access to reliable and quality telecommunications services is essential to support the economic and social well-being of those who live in RRR Australia.

Service provisions and coverage

National and international companies providing essential communications services, such as Starlink, offer data coverage at market prices. However, the issue of service provider monopoly arises, as consumers want a reliable service at an affordable price. This is particularly evident in the Alice Springs Town Camps, where the telecommunications infrastructure is of poor quality.⁸ Services like Starlink LEOSats, while potentially useful in these scenarios, also come at a market price significantly higher than metropolitan broadband services, making them potentially unaffordable for some RRR consumers.

Addressing coverage gaps in next-generation networks is essential to ensure equitable access to communication services, particularly in RRR Australia. Furthermore, stakeholders noted there is concern that the shutdown of 3G networks may increase the number of mobile black spots, which will require a review of the Mobile Black Spot Program and Regional Connectivity programs. ACCAN stakeholders have also expressed the need for more transparency around mobile coverage in RRR areas, particularly in relation to network congestion.

Efficacy and capability in disaster situations

Mobile services play a critical role in ensuring the safety of communities during disaster situations. Throughout Australia, state and territory governments are increasingly using mobile applications to communicate with the public during natural disasters, such as bushfires and floods. It is essential for mobile networks to have reliable redundancy measures in place to guarantee uninterrupted connectivity for consumers during emergencies and unexpected network outages. To enhance connectivity during times of disaster, ACCAN supports the implementation of domestic mobile roaming services in the event of a network outage.⁹

⁷ ACCAN, 'Better Delivery of Universal Services' (Submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 8 March 2024).

⁸ Tangentyere Council Aboriginal Corporation, '2018 Regional Telecommunications Review' (Submission to the RTIRC, 8 August 2018) 7.

⁹ See, ACCAN, 'Better Delivery of Universal Services' (Submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 8 March 2024) 15-16; ACCAN, 'Senate Inquiry on the Optus Network Outage' (Submission to the Senate Standing Committee on Environment and Communications, 21 November 2023).

Stakeholders of ACCAN have expressed concerns about the effectiveness of emergency warning messages sent via text by emergency services.¹⁰ They have highlighted the need for such messages to account for the fact that individuals without mobile coverage will not receive the warning during a natural or human-caused disaster. The implementation of mobile roaming may help address this issue. An ACCAN stakeholder also noted that the government should consider developing a subsidised emergency telecommunications kit, which supports consumers in RRR communities on how to stay connected during disaster situations.

Furthermore, ACCAN has previously illustrated how emergency communications often fail to consider the needs of people with disability, and ACCAN recommends the Committee further investigates the impact of the 3G shutdown on people with disability during a disaster situation.¹¹

Adherence to, adequacy of, and opportunity to improve service obligations

The shutdown of the 3G mobile network has brought to the forefront the crucial role of mobile services across Australia. Service obligations are integral to ensuring communications consumers are adequately supported, especially in any future shutdowns of next-generation mobile networks. Therefore, ACCAN suggests that the Committee:

- Explore ways to incorporate mobile services into Australia's USO to complement fixed services.

ACCAN has previously proposed expanding the scope of the USO to encompass mobile infrastructure and services. ACCAN has advocated for a technology-agnostic approach to establishing legal frameworks that acknowledge how technological advancements could enable providing a USO mobile service through satellite interoperability in the future.¹² We further suggest that the inclusion of mobile services into the USO should outline best practices for any future shutdowns of mobile networks to best support consumers during future technological transitions.

Any other related matters

ACCAN recommends that the shutdown of the 3G mobile network necessitates a detailed and critical assessment, as well as the creation of protocols for future technological transitions to support consumer and business confidence. The Inquiry should serve to support future technological transitions, enabling consumers to transition to subsequent mobile networks effectively and smoothly during future shutdowns.

¹⁰ ACCAN, 'Inquiry into mobile telecommunications failure during widespread power outages in Western Australia' (Submission to the Standing Committee of Public Administration, 26 April 2024) 3.

¹¹ Ibid 4.

¹² ACCAN, 'Better delivery of universal services' (Submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 8 March 2024) 14.