



Review of the National Triple Zero (000) Operator

Submission by the Australian Communications Consumer Action Network to the Department of Communications

26 August 2014

About ACCAN

The Australian Communications Consumer Action Network (ACCAN) is the peak body that represents all consumers on communications issues including telecommunications, broadband and emerging new services. ACCAN provides a strong unified voice to industry and government as consumers work towards availability, accessibility and affordability of communications services for all Australians.

Consumers need ACCAN to promote better consumer protection outcomes ensuring speedy responses to complaints and issues. ACCAN aims to empower consumers so that they are well informed and can make good choices about products and services. As a peak body, ACCAN will represent the views of its broad and diverse membership base to policy makers, government and industry to get better outcomes for all communications consumers.

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1. Executive Summary

As the peak consumer organisation in the Australian telecommunications sector, ACCAN's interest in the review of the national triple zero 000 operator is to ensure that the triple zero service continues to provide reliable, clear and responsive access to emergency services for all Australians. It is clear from the discussion paper and related information that the current voice-only service has been serving the needs of the majority of Australians well for more than 50 years. ACCAN sees this review as an opportunity to identify gaps in the current service and an opportunity to recommend ways in which these gaps can be ameliorated, providing a national triple zero 000 service to protect all Australians whenever and wherever they need emergency services – Fire, Ambulance, Police.

While the current service, borne out of the legacy fixed-line standard telephone service, has proven to be a reliable and resilient public safety service, it is clear from the research, both as indicated in the discussion paper and from our own research¹, that there are gaps in the current service. Gaps which current telecommunication technologies can ameliorate - emergency situations in which making a voice call to triple zero is either unsafe or not possible.

ACCAN, in partnership with disability organisations, is concerned that for some Australians with disability it is difficult or sometimes not possible to contact triple zero 000 while they are out and about. Deaf, hearing impaired or speech impaired Australians who are unable to use voice telephony have only recently been able to request emergency assistance using SMS through the National Relay Service. While this provides limited access to emergency services it is important to note that the SMS relay service is not recommended as a reliable stand-alone method for requesting emergency assistance, in fact the National Relay Service website warns that SMS relay for emergency calls should only be used as a last resort².

ACCAN is also concerned that the current voice-only service is not capable of handling requests in those situations when it is not safe for the caller to make a voice call. Situations such as domestic violence, home invasions or hostage situations; emergency situations where making a voice call for assistance would further endanger the caller.

Additionally, there are other circumstances when making voice calls to triple zero is not possible, such as in areas where there is limited mobile coverage and voice calls are not possible but an SMS request could be supported by the limited network coverage.

ACCAN understands there are a number of increased opportunities which are possible via current and emerging technologies, and while ACCAN supports consumer choice, our paramount concern is that any enhancement to the current service must complement the current system and not detract from its ease of use and reliability.

¹ See ACCAN submission Inclusive Communications: Review of ACCESS to Telecommunications Services for People with Disabilities, Older Australians and People Experiencing Illness

https://accan.org.au/index.php?option=com_content&view=article&id=361:review-of-access-to-telecommunication-services-by-people-with-disability-older-australians-and-people-experiencing-illness&catid=142:access-for-all&Itemid=178

² <http://relayservice.gov.au/making-a-call/sms-relay/>

1.1. List of recommendations

ACCAN recommends that the mobile carriers, emergency service organisations and the relevant Government agencies continue to develop systems to improve mobile call location information.

- ACCAN recommends the implementation of SMS text capability for triple zero calls
- ACCAN recommends the implementation of mobile application capability for triple zero calls.
- ACCAN recommends that further public consultation be undertaken before information other than location information is required when making triple zero calls.
- ACCAN recommends that the current regulatory and funding model for the national triple zero service remain into the future.
- ACCAN recommends that any changes to the triple zero service framework continue to encourage multi-stakeholder cooperation.

2. Responses to National Triple Zero review

Question 1: Community expectations

It is commonly accepted that community expects the Triple Zero service to be contactable anytime, anywhere, easily, quickly and free of charge.

Are these your expectations of the Triple Zero service now and into the future? Are your expectations currently being met? Why or why not?

ACCAN understands that these are fundamental expectations of our triple zero service for all Australians. It is clear from the discussion paper and related documentation that for most Australians these fundamental expectations are being met by the current voice-only service. However, for those Australians who are not able to use voice-telephony the current service is not meeting their expectation that individual and public safety is easily and readily available at all times. Additionally, in situations where making a voice call to triple zero is not safe the current service falls short. If it is unsafe to make a voice call to triple zero there is no current alternative way for people to request emergency assistance.

Furthermore, ACCAN is aware that given the disparity in mobile coverage across some of our regional and remote jurisdictions it is possible for SMS messages to be sent when there is not enough coverage to make a voice call. Thus, relying on voice-only triple zero access for Australians in areas where mobile coverage is not always reliable for voice calls means that when out and about it cannot be guaranteed that the current triple zero service will meet the community's expectations.

Looking forward, it is clear that with some of the new technologies highlighted in the discussion paper, some of these expectations may be unrealistic. Therefore, any enhancement to the triple zero service which does not meet all these community expectations will need to be clearly and widely publicised in order to ensure that consumers understand any limitations of the method they choose when contacting triple zero.

Question 2: Challenges facing the Triple Zero service

Ongoing changes in the communications landscape, and certain expectations in the community regarding the nature of the service, present challenges for the Triple Zero service. These challenges include locating callers, the quality and prioritisation of VoIP calls, extreme call volumes during disasters and non-emergency calls.

What are your views on these challenges and what further steps could be taken to address them? What other challenges need to be considered?

ACCAN is of the view that given the increasing use of mobile calls to triple zero, it is in the community's interest that important location information be made available to emergency services. The location information provided through the integrated public number database (IPND) while suitable for fixed-line location does not provide useful information for mobile triple zero calls. ACCAN is aware of work being undertaken by mobile carriers to develop more relevant, timely and accurate location information using network and cell information. Utilising this information in conjunction with handset information from smartphones will provide the possibility for triple zero callers to provide their accurate location information easily and quickly.

Acknowledging there is a tension between the need for emergency service responders to have accurate location information and an individual's privacy, ACCAN considers that it is important to ensure that any automatic provision of mobile caller location information is transparent.

ACCAN recommends that the mobile carriers, emergency service organisations and the relevant Government agencies continue to develop systems to improve mobile call location information.

Question 3: Other ways of requesting emergency assistance

The only way of contacting Triple Zero is with a voice call and this is likely to remain the primary way of requesting emergency assistance. However, people use a range of other ways to communicate, including SMS, email, instant messaging, video calls and social media.

In addition to voice calls, is it desirable to have other ways of requesting emergency assistance? If so, what ways and what challenges do you foresee?

ACCAN recommends the implementation of SMS text capability for triple zero calls. We see this as an enhancement to the current voice-only service which would help to ameliorate the gaps in the current service. ACCAN understands from our conversations with industry that implementing a nationwide SMS triple zero service is readily achievable with minimal cost. ACCAN also understands that some of the inherent technological issues associated with SMS can be overcome with network enhancements. While these enhancements may not be able to alleviate all of the technical issues, ACCAN asserts that SMS triple zero capability will provide greater public safety

Latest information on Australian mobile phone uptake indicates a high percentage of mobile handsets are smartphones³.

However, ACCAN understands that the feature phone is still preferred by some groups of consumers. For example, our mobile phone research conducted with Australian Deaf societies (2013) indicated that approximately 50 per cent of Deaf consumers using Deaf society services use feature phones rather than smartphones⁴. Implementing a nationwide SMS triple zero service will allow all mobile phone users to have access to emergency call services when they are out and about.

A SMS enhancement to our national triple zero service will ensure Australia continues to have a world best-practice emergency call service. ACCAN is aware that the US is implementing text to 911⁵ and a number of international jurisdictions have implemented text to emergency services.

In addition to SMS, ACCAN recommends the implementation of mobile app capability for triple zero calls. With Australia's high take-up of smartphones and the consequent changes in consumer behaviour using mobile apps for everyday activities⁶, ACCAN asserts that enhancing the national

³ See Telsyte Research 2014

<https://www.telsyte.com.au/?p=2497>

⁴ ACCAN Commissioned Research 2013: Available on request

⁵ See FCC <http://www.fcc.gov/document/fcc-adopts-text-911-rules>

⁶ See ACMA Emerging Issues in Media and Communications Occasional Paper 1, *Mobile Apps*

<http://www.acma.gov.au/theACMA/About/The-ACMA-story/Connected-regulation/mobile-apps-emerging-issues>

triple zero service to accommodate requests for emergency services via mobile apps will provide greater public safety. We are aware that there is discussion underway to enhance the Attorney's General Emergency Plus mobile app⁷ to include the automatic transmission of location information – longitude and latitude to the ECP when the app is used to call triple zero. ACCAN supports this initiative as an additional channel for requesting emergency service assistance, noting our comment above regarding consumer awareness and consent in provision of location information.

Question 4: Improving information

It is important that emergency service organisations, as well as callers, have the information they need in an emergency. Changes in technology offer opportunities to improve the information available, however, these changes also present some challenges.

What information is essential to emergency service organisations and callers in an emergency and what information is desirable?

ACCAN is of the view that of foremost importance is the provision of reliable, timely and accurate emergency location information to be provided to the ECP and ESOs. This is a critical priority for effective delivery of emergency services, and is a threshold question asked of callers contacting the ECP/ESOs. The current voice-only service provides service location information for fixed-line telephone calls to the ECP via the integrated public number database (IPND). As noted above, we understand that mobile network developments and smartphone handset capabilities will shortly allow the provision of timely and accurate mobile location information to triple zero operators and ESOs. As indicated in the discussion paper appendix, Department of Broadband, Communications and the Digital Economy research indicates that consumers have an implicit understanding that their location information is provided to the emergency service when they call from a fixed-line telephone. While it is possible that this same implicit understanding is held for calls made to triple zero using mobile phones, ACCAN and our members consider that there are potential privacy concerns with automated location information being provided from mobile calls and as such ACCAN recommends that consumers be explicitly notified when their location information is being provided to triple zero. We further note that a mobile caller may not be necessarily in the same location as the emergency incident reported, suggesting that caller location in such circumstances is not essential to the delivery of emergency services.

ACCAN has concerns that the requirement for any other personal information to be provided to the ECP and ESOs may inhibit genuine requests for emergency services. It is not clear to ACCAN that there is a case for more information to be provided without caller consent. Again, as indicated in the discussion paper appendix, Department of Broadband, Communications and the Digital Economy research suggests that the community is not convinced that additional personal information is an essential requirement when making a triple zero call. As such, ACCAN recommends that further public consultation be undertaken before information other than location information is required when making triple zero calls.

Question 5: The role of the national Triple Zero operator

⁷ <http://www.triplezero.gov.au/Pages/EmergencySmartphoneApp.aspx>

A tender for the national Triple Zero operator is required to be issued by June 2016. The aim of this review is to ensure that the arrangements for the national Triple Zero operator continue to support a world class Triple Zero service into the future.

What criteria should be used to determine the functions of the national operator?

ACCAN is of the view that the current national triple zero service model provides the greatest community protection. The current service of dialling one number regardless of where you are calling from in Australia ensures that everyone in the community understands how to call for fire, ambulance or police when in an emergency situation. This uniformity of the current service provides community certainty.

ACCAN considers that the current contractual and regulatory model is in the best interest of the community. While the service is administered at 2 levels; the Commonwealth providing the Emergency Call Person (ECP) or triple zero service and the States and Territories responsible for the Emergency Service Organisations (Fire, Ambulance, Police). The community expects the triple zero service to perform as one. ACCAN sees this as being one of the underpinning benefits of a national service and recommends that this remain the model into the future.

One of the primary roles of Government is to protect the community and as such ACCAN sees the triple zero service as a fundamental function of Government which needs to be quarantined from privatisation.

Question 6: The role of telecommunications providers

Telecommunications providers have regulatory obligations in relation to Triple Zero, recognising their importance in the delivery of the service. However, it is important to consider whether the regulatory framework remains appropriate given changes in technology and the telecommunications industry, the likely direction of the Triple Zero service, and the Government's commitment to reduce the regulatory burden on industry.

Is the current regulatory and funding framework for the Triple Zero service appropriate now and for the future? If not, what changes should be made and why?

ACCAN appreciates the vital role telecommunications providers play in both the provision of a reliable and secure triple zero service and in the financial arrangements whereby telecommunication providers are required to contribute to the ongoing running of the triple zero service.

This current regulatory framework has served the community well and we see no reason to change this model. Understanding that changes to the ECP infrastructure are funded by the Commonwealth, ACCAN recommends that the current regulatory and funding model for the national triple zero operator remain into the future.

ACCAN does not expect that our recommendations for an enhanced triple zero service, capable of accommodating SMS and mobile app calls, will incur onerous additional expense to industry or consumers.

Question 7: The role of innovators

Innovative ideas to improve emergency assistance may come from a range of parties such as app developers, device and car manufacturers, research organisations, community service providers and individuals.

What sorts of innovations would most improve the Triple Zero service? How can innovation and third party innovators be supported while ensuring the reliability and integrity of service?

ACCAN sees the development of minimum standards as a key enabler for innovation for triple zero services. Providing clear and precise obligations and expectations for triple zero technology will guide future developments and innovation which may enhance the service while ensuring that personal and community safety is protected.

Question 8: Cooperation and decision-making

There are a range of parties with interests and responsibilities in relation to Triple Zero. It is important that there are effective cooperation and decision-making arrangements in place amongst these parties so that the service can continue to adapt and respond to issues as they arise in the future.

What things do the current cooperation and decision-making arrangements for Triple Zero do well? What things do they not do well? What changes are needed so the service can better adapt and respond to issues in the future?

ACCAN sees the current stakeholder cooperation as being one of the strengths of national triple zero services. Government, both Federal and State and Territory, the ECPs, emergency service organisations and industry cooperatively contribute to the success of our national triple zero service. ACCAN recommends that any changes to the triple zero service framework continue to encourage multi-stakeholder cooperation, including consultation with consumers.

3. Conclusion

ACCAN considers that Australia's national triple zero service is an example of best-practice for an emergency call service. It is clear that the current operational and governance framework have served Australians well since the service's inception in 1961. However, the voice-only limitation of the current service does not provide adequate safety and protection in all emergency situations. As indicated in our responses to the discussion paper questions ACCAN believes that through a number of enhancements to the current service, these shortcomings of the service can be ameliorated.

Utilising widely accepted communications channels, SMS and mobile apps, the service will be able to provide greater personal safety and community protection into the future. Implementing these enhancements on a national level will build on the community's expectation that triple zero needs to be an easy to use, widely understood, responsive and reliable public service.