26 August 2020

Craig Purdon
Project Manager
Communications Alliance
via email: c.purdon@commsalliance.com.au

Dear Craig,

Re: DR C536:2020 – Emergency Call Service Requirements Industry Code

The Australian Communications Consumer Action Network (ACCAN) would like to thank Communications Alliance for the opportunity to provide a few comments on the draft Emergency Call Service Requirements Industry Code (DR C536:2020). Our comments on DR C536:2020 are supported by the following ACCAN members: Australian Seniors Computer Clubs Association (ASCCA), Combined Pensioners & Superannuants Association of NSW (CPSA), Committee of the Consumers Association of SA, Consumers' Federation of Australia, HK Training & Consultancy, Physical Disability Council of NSW, Ian Butterworth, and Nigel Waters.

DR C536:2020 is an important Code for industry and consumers alike. It provides clear requirements around the provision of the Emergency Call Service (ECS) in Australia and reaffirms obligations around ensuring consumers have access to the ECS, as well as access to public information about the ECS. On the whole, it is ACCAN's position that the current DR C536:2020 meets the stated objectives of this Code. Any subsequent amendments or changes must serve only to strengthen these objectives and existing obligations.

Public information

Public, consumer-friendly information about the ECS is vital, and as such, ACCAN fully supports the obligations on Carriers and Carriage Service Providers (CSPs) outlined in section 4.5, Publicity and Customer Information. As part of ACCAN's community consultation on DR C536:2020, some of our members informed us that more needs to be done to educate and inform school children, newly arrived migrants, refugees and tourists about the Australian ECS. We are therefore pleased that 4.5.1 includes an obligation for Carriers and CSPs to inform and promote awareness of the ECS to the public, not just individual customers.

Public Payphones

ACCAN is also particularly pleased that DR C536:2020 upholds existing obligations on Carriers and CSPs providing Public Payphones, as outlined in 4.5.2 and 4.5.3. These obligations, relating to prominently displaying (on or adjacent to the Payphone) information relating to Emergency Service Numbers and Emergency Calls, are not only important for improving public understanding of the ECS, but may also play a key role in improving public safety.

The provision of this important information on Public Payphones is vital given the continued use of Payphones, particularly in emergency situations or circumstances in which other forms of connectivity are impacted. For instance, Telstra has reported that during the 2019-2020 bushfire season there were more than 2,546,000 free calls made from 832 Payphones in areas directly affected by bushfires.[1] Similarly, some of ACCAN's members that work alongside remote Aboriginal communities have reported that free calls from Public Payphones (also referred to as community phones) are typically well received by their members and clients. In some instances, free outbound calls from Public Payphones have enabled our members greater and more sustained contact with their clients in remote parts of Australia.[2] It is therefore important to ensure members of the public are informed (through information provided on or adjacent to Public Payphones) that they can make free emergency calls from Public Payphones.

ACCAN's members report that people living in remote Aboriginal communities can be highly reliant on Public Payphones, including people living on Homelands and Outstations. People living in these areas may not have mobile phones or fixed line services. Others may have mobile phones but no coverage. Indeed, the 2016 Northern Territory Homelands and Outstations Assets and Access Review[3] found that approximately 320 occupied Homelands in the Northern Territory had no access to mobile coverage and were reliant on Public Payphones as their only form of telecommunications access. In these remote areas, Public Payphones are the only means to contact the ECS in an emergency situation. This highlights the importance of displaying and providing information about free calls to the ECS on the Public Payphones.

Operational difficulties

In relation to section 4.6, Communication of operational difficulties, ACCAN supports the proposal to delete Note 1 and replace it with a new Code clause, as provided in the drafting note.[4] It is ACCAN's understanding that many Carriers and CSPs already make information about network outages available to the community. Consumers may access this information through dedicated network outage pages on Carrier or CSP websites, through social media posts or other platforms, such as independent websites that track network outages.[5] This new Code clause could be accompanied by a Note outlining that smaller CSPs without the resources or capacity to provide real-time updates on network outages could comply with this clause by providing a link

[1] During the bushfires Telstra made its payphone network (across the country) available at no cost to users (for local, national and standard mobile calls). For more information about the number of calls and call minutes made during this time, visit: https://exchange.telstra.com.au/after-a-devastating-fire-season-weve-made-good-progress-keeping-communities-connected/

[2] In particular, some of our members report greater contact with their clients during the COVID-19 pandemic, when 573 Public Payphones in remote parts of Australia were made free to use. Our members are concerned, however, that not all of these Public Payphones are well maintained or functional. Further information available: https://www.sbs.com.au/nitv/article/2020/04/01/payphones-are-now-free-charge-across-hundreds-remote-indigenous-communities

[3] Centre for Appropriate Technology Ltd, 2016. 'The Northern Territory Homelands and Outstations Assets and Access Review: Final Report 2016', available: https://static1.squarespace.com/static/5450868fe4b09b217330bb42/t/57f6f64746c3c4ab7345af96/1475802710933/Final-Master-HOAAR-Report-Oct2016-1.pdf

[4] This new clause would read (as stated on p15 of DR C536:2020): 'Carriers and CSPs must make information available to the community on a 24 x 7 basis when they become aware of a Significant Network Outage in their network(s) which impacts access to the ECS.'

[5] Such as, for instance, Down Detector (available: https://downdetector.com.au/) or Is The Service Down? (available: https://aussieservicedown.com/).

on their website to the network outage page of their wholesale Carrier. ACCAN is interested in what smaller CSPs think of this proposal, and how this clause or Note could be amended to take into consideration both CSP resourcing and the expectations of communications consumers.

General feedback

ACCAN supports the updates that have been made to the appendices and notes that the information provided in appendix A of the draft Code will likely be of particular interest to consumers. We therefore appreciate the effort that Communications Alliance and industry representatives have made to keep this information as plain and consumer-friendly as possible. Subsequent industry, regulator, government or other use of this information in public communications to consumers must retain or improve upon the easy to understand, plain language approach demonstrated in appendix A. Improvements could include, for instance, the development of Easy English or Auslan video resources about calling emergency services.

Finally, ACCAN would like to raise a few editorial amendments that we believe are required to the current draft Code. These amendments (as detailed in the below footnotes) relate to sections 1.3.1 and 1.3.3,[6] 3.1.3 and 3.2.2,[7] 4.5.1,[8] 4.7.2,[9] and appendix A[10] of the draft Code.

Thank you again for the opportunity to provide feedback on DR C536:2020. We look forward to discussing our feedback with you in the next stages of the public comment process.

Yours sincerely,

Meredith Lea
Disability Policy Adviser

[6] In 1.3.1 remove 'and' from the end of 1.3.1 (a) and remove the full stop from the end of 1.3.1 (b) and add '; and'. In 1.3.3 remove 'and' from the end of 1.3.3 (a) (ii) and move it to the end of 1.3.3 (a) (iii).
[7] Capitalisation of the word 'service' in acknowledgement of the defined term 'Fixed Local Service'. These capitalisations are required in the second sentence of 3.1.3 and in the first sentence of 3.2.2.
[8] Add 'and' at the end of 4.5.1 (e).
[9] Add 'and' at the end of 4.7.2 (b).
[10] To keep the information in appendix A easy to understand, some paragraphs may need to be revised. ACCAN recommends, for instance, removing references to 'customers' in the second and third paragraphs of page 19 and replacing them with consumer-focused language e.g. 'you', which is predominantly used in appendix A1. An additional edit is required on page 20, appendix A4. The second paragraph refers to a 'mobile hone's firmware', which must be changed to 'mobile phone's firmware'.