The Hon Malcolm Turnbull
Minister for Communications
Parliament House
CANBERRA ACT 2600

Dear Minister

Thank you for the opportunity to contribute to the review of the national Triple Zero (000) operator. I am responding to the discussion paper both as a member of the Australian community, but also as a member of the emergency services sector with interest and involvement in the Triple Zero service.

My comments are my personal views and perceptions and should not be construed as a representation of my employer.

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?

Within the current voice focussed service provision, I agree that the current Emergency Call Person is easily and quickly contactable from anywhere in Australia where a voice service exists.

I also recognise and concur with the Department's inference that there is a community wide expectation that this same level of service will be available regardless of my preferred method of contact – as I expect with other services.

I expect that I can contact community based services via multiple channels, particularly for information or follow up. After being associated with major events such as the Victorian Bushfires and the 2011 Queensland floods I can attest that if improved information access via alternate channels was available, whilst the demand would not have decreased, the potential for faster connection to emergency services would have been improved by the redirection of information calls away from the Triple Zero national operator. Addressing this opportunity for future events should be a paramount target of all sections of the public safety sector.

The provision of the call free of charge supports the community focus of the service in making it accessible to all. However, to maintain currency with my and other community member's expectations, I don't believe the current funding model is sufficient to either encourage innovation or development of the service to accommodate capability beyond the current voice only platform.

I suggest that an additional and/or alternative funding source needs to be found to improve the capability and maintain currency with community demand.

Putting aside the privacy implications, I fully expect, within current technical capabilities, to be identified and located by the service provider I am contacting and for them to use this information, together with other data they have collected or been given access to, when assisting with my query. I have no less an expectation when contacting emergency services, in fact in times of crisis, I would demand it.

From a privacy perspective, it is generally viewed that people appear willing to share very personal information via insecure social media channels but resist when government agencies want to gather information in a secure environment to improve services. It would seem that the establishment of a secure site for people to lodge additional personal information for use by the national operator / emergency service organisations to respond to my critical incident – and potentially save my life – is an inconsequential perceived breach of privacy.

There are products and services in international markets that enable this capability. As a citizen I would expect to have the capability offered to me in support of my personal safety and wellbeing.

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?

The identification of location is the most critical piece of information in responding to requests for emergency assistance. It is important that in the review of the national operator and the Emergency Call Service (ECS) more broadly, the department address a number of aspects in the provision of this information including legislative, regulatory, and technical.

Evidence internationally demonstrates the need for strong leadership in ensuring the legislative framework and accompanying regulatory environment compels carriers, manufacturers, and developers to deliver location information to emergency service organisations in a format appropriate for their use in response coordination.

From a technical standpoint, and in accommodating the varied landscape of Australian cities and regional areas, latest evidence is showing that the provision of the traditional GPS coordinates in latitude and longitude is no longer sufficient from two important aspects.

Firstly, the lack of appropriate location information lengthens response times and potentially increases negative outcomes for the community.

Currently location is identified using various methodologies based on the mobile tower location and can range from a small geographic footprint (inner city) to a large area (rural) making it difficult in some instances for the responder officers to arrive on scene in timely manner.

Location identification to the device will improve this capability by reducing the geographical scope of the search area for persons at risk and improve emergency responder safety by allowing response coordinators to make better decisions in the knowledge of the environment the event is occurring in.

Secondly, while it has been demonstrated that the provision of a GPS location will provide an address position, in many instances, these addresses relate to a high rise building or apartment complex that may require the responding officers to search for the caller, thereby further delaying the response to the emergency situation.

Not only is the horizontal, or commonly known X,Y coordinates important, but increasingly indoor or apartment location is equally important. The vertical, or Z, position is key to fast location identification and coordinating first responders movements.

In February 2014, the U.S. Federal Communications Commission released a proposal to amend the rules for location identification for 9-1-1 to include the vertical (Z) coordinate in the identification of location. The public consultation period has recently completed and the final outcome is expected in the near future.

On the assumption that this change will be endorsed, the same capability should be afforded to Australians also. The implication for carriers and the national operator is for the Emergency Call Service Determination to recognise this change and drive the carriers to deliver this data to the national operator, and the national operator to use and on-forward the data to the emergency service organisations.

The current Triple Zero service is successful in managing day to day demand for Triple Zero services, including the filtering of a majority of non-genuine callers before transferring the calls to emergency service organisations.

It is also recognised, particularly in Commissions and Inquiries, that in times of disaster the capacity of both the national operator and emergency service organisations is often exceeded causing delays to callers accessing the Triple Zero service.

In addition to information calls, the demand placed on the national operator and emergency service organisations by non-genuine calls continues to exacerbate the potential for delays in accessing the Triple Zero service, placing lives at risk.

I note the development of the emergency+ app for smartphone devices and believe the opportunity to further enhance this product will assist in managing both demand and improve caller information.

While not directly in the purview of the national operator, the emergency+ app supports, in its current configuration, access to the devices geospatial location that can be relayed to the national operator or emergency service organisation officer, but only verbally.

To further enhance the app, support the reduction of information type calls, and improve the response to the caller, I suggest the following opportunities exist:

- automatic push/delivery of the device GPS location data to the national operator / emergency service organisations

- a subscriber/opt-in based service enabling the caller to input personal details into a secure database for emergency service organisation access in response to Triple Zero calls made from that device by that person / family

- an information service providing current information about significant events (e.g. fire, flood, storm, etc.)

- a general public safety information service including video and other media providing community members with access to preparation, resilience, or other general safety information. This would also assist in making the emergency+ app a regular part of people's lives rather than a 'once in a blue moon' reference point.

- the ability to interact with the national operator / emergency service organisations via text or other non-voice methods

- a national marketing campaign to increase awareness of, and reference to, the app

- opening the development of the app to an open source arrangement in which interested parties are able to develop improvements and additional functionality supporting emergency services and Triple Zero, but which are channelled through the emergency+ app to maintain consistency of interaction, and managed through the governance arrangements.

As noted earlier the principal requirement of the national operator and emergency service organisations receiving a call for assistance is the location of the caller. While the current requirements on carriers to capture, store, and provide caller account details to the national operator and emergency service organisations supports landline services, it does not adequately address mobile, or VoIP services; nor will it adequately support emerging communications channels such as SMS, social media, instant messaging, or video.

The emergency+ app will support this requirement in part for mobile devices making voice, SMS, IM, or video calls, however the use of VoIP or other IP based communication services has the potential to severely restrict access to location data.

Recently, TPG was fined for not managing IP based connection to Triple Zero appropriately and as IP networks expand (e.g. NBN) where traditional wireline services are removed, the risk of unscrupulous providers selling services that either do not have access to Triple Zero and/or are poorly administered increases.

Evidence from international sources, such as the United States, indicate that the federal agency must provide strong leadership on this issue or risk an uncontrolled sector which will increase the complexity for the national operator and emergency service organisations, delay responses, and potentially put lives at risk.

It is generally recognised that the size, scale, and complexity of major events is changing and with it, the demand for assistance and information is increasing. The risk to the national operator, the emergency service organisations, and the Community alike is that a total reliance on technology to solve these demand issues does not provide sufficient resilience in supporting community safety.

While enhanced services such as the emergency+ app, supports the national operator in its initiatives to manage call demand, there is an underpinning issue in that – during these major events – access to technologies providing information may not be readily available driving the affected community members toward more traditional information sources.

The national operator, and the emergency services community more generally, must be in a position to provide information in multiple formats in a timely manner that is suitable for the nature of the event. This will assist in reducing the 'need' to call the national operator for information that will be more generally available.

From a technological basis, and in conjunction with improvements in location identification, this could be supported through initiatives such as:

- Using the location of the call request the caller to predict if the call is in relation to a new event or is seeking information about an existing event

- Redirecting information calls from known event sites to other sites/services or perhaps standing up the national emergency communication centre during these events in support of the national operator.

The advent of the Policelink service has provided a much needed capability for the community to access non-emergency support. I suggest that continued development of this service and increasing the interaction between the national operator, emergency service organisations and the Policelink service together with other services supporting non-emergency interactions such as Crime Stoppers, and health assistance lines, will further support the redirection of non-emergency calls away from the national operator.

I recognise that for many community members, the determination of an 'emergency' situation is reliant on personal perceptions and may not always align with the definition used by emergency service organisations.

Technical improvements in terms of call interception assist in managing caller expectations, however these could be further enhanced through the establishment of a nationally interconnected telephony system whereby a caller acknowledging their issue is non-urgent could be automatically redirected to the Policelink or other non-emergency support service. Similarly, callers to, or providers of, non-emergency services should have the option of escalating their call to emergency should circumstances change while on the call.

To improve the awareness and use of non-emergency service, a constant and consistent community education campaign related to the use and purpose of Triple Zero and the associated non-emergency numbers should be in place.

It may also improve community understanding and awareness if the numbers related to public safety, both emergency and non-emergency, were all short-code dialling numbers such as 000. This would reduce the requirement for people to recall long numbers and assist in marketing and community education. As an example, Policelink could be shortened to 444.

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?

In the foreseeable future voice will remain as the predominant, and preferred, method of communication for emergency services. However, as discussed earlier, community expectation of how they can interact, request assistance, and access information is (has) already changing(ed). The risk is that the national operator and emergency service organisations are lagging behind in exploiting the opportunities of this change in reducing the impact on the Triple Zero service.

The advantages to the national operator and emergency service organisations in having this capability available to the community is not just in the provision of richer information, it is also in enabling both parties to provide access to information through other non-voice sources that would otherwise require a phone call and tie up an operator, potentially delaying the receipt of an emergency call.

From research and experience reported internationally, there appear to be a number of challenges that will be faced by both the national operator and emergency service organisations. These include:

- The receiving systems (CAD, networks, etc.) in the most part will require a level of development to accommodate the delivery, interaction, and transfer of these data services.

- There is a risk of creating a level of inequality of service as States and Territories individually and independently improve their capability to meet community expectations.

- Without an appropriately sustainable governance and funding model the transformation will be spread over many years causing frustration in the community and the Agencies trying to support them, and potentially damaging the positive reputation that Triple Zero has today.

- The earlier mentioned commentary in relation to location identification becomes even more important as the confirmation of address location without voice contact places a level of risk on affecting the correct response.

- Without verification of location, emergency services are open to false reports potentially committing resources to non-events and distracting them from 'real' events that may be occurring elsewhere.

- In the United States, the Next Generation 9-1-1 program, while delivering access to new technologies, is predominantly about delivering a common and improved data network between PSAPs to increase transfer of data capability and hand off of active tasks between emergency service organisations. The challenge I envisage is not only in creating this capability within the emergency service organisation specific technologies but also in the 'carrier' based network infrastructure that traverses the country.

- It is also important to remember that the national operator and emergency service organisation operators receiving the non-voice communication may be presented with confronting and distressing images, or video. The challenge will be in carefully designing the solution to ensure that data is managed sensitively and that staff are equipped to deal with these situations.

- While these advances will improve the connection between the community and emergency service organisations, an equally important aspect and challenge is providing appropriate communications capabilities between the emergency service organisation's Public Safety Answer Points (PSAP) and the emergency responders in the field. The introduction of data communications into the Triple Zero environment enables the opportunity to on-forward this data directly to the responder. The risk associated with not considering this 'inward facing' connection is that without an appropriate or equivalent level of focus and development in the networks and systems supporting these links a gap in capability will develop potentially devaluing the improvements in the national operator and emergency service organisation, and inhibiting the full benefit of these improvements.

While there are some considerable, and potentially costly, challenges in making these access channels available to the community, the advantages are equally significant and potentially cost saving.

In continuing the development of these access channels, supported by an appropriate and sustainable governance and funding model that enables the national operator and

emergency service organisations to deliver the improvements in a timely and consistent manner across the country, all Australians will benefit equally.

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?

There are specific information assets that are vital to both the national operator and emergency service organisation, as well as the callers but are used in slightly different ways.

The primary, and most important, piece of information is location. For the caller it is important so they can initiate an emergency request. For the national operator and emergency service organisations, location enables the activation of the response but also enables additional intelligence such as geographical implications, responding unit allocation, and proximity to other events or requests for assistance (e.g. multiple calls about a road accident, or notifications of a spreading fire-front).

The expansion of access channels into non-voice data services, only increases the importance of accurate location information as the first data set required by both the caller, the national operator, and emergency service organisations.

Traditionally the identification of location has been based on data sets such as the IPND, and more recently through the mobile tower location through which the caller is accessing Triple Zero.

The provision of the traditional GPS coordinates in latitude and longitude is no longer sufficient from two important aspects.

Location identification to the device will improve this capability by reducing the geographical scope of the search area for persons at risk.

Not only is the horizontal, or commonly known X,Y coordinates important, but increasingly indoor or apartment location is equally important. The vertical, or Z, position is key to fast location identification and coordinating first responders movements.

In the future, location needs to be defined to the device, using X, Y, and Z coordinates to maximise the identification of the person at risk and direct the responders to a defined location rather than an area as currently is the case.

Secondly, the nature of the incident and any supporting information allows the caller to relay the requirement of the emergency request and the emergency service organisation to manage the appropriate response based on the nature of that incident.

In a voice situation, this is further enhanced as the operator is able to ascertain other background information such as raised voices, alarms, etc. that otherwise may not be available through non-voice interaction.

Internationally, this is further being enhanced with community subscription services that allow people to enter personal data into a secure database that is provided to emergency service organisations during a response. This information can include photos, medical information, family details, property access details, etc.

The emergence of electronic medical files through other national initiatives should also be available to emergency responders.

A significant improvement in the Triple Zero service will be the reduction of non-urgent communications from the Triple Zero queue and the elimination of false, fraudulent, or mischievous communications. These latter types have the potential to increase with the introduction of non-voice channels unless carefully planned and managed.

Additional information not only assists emergency service organisations in responding to critical events but also supports the caller by enabling access to supplemental or advance information that can reduce the perceived need to contact Triple Zero for follow up or general information on an event.

The use of non-voice channels and the overt promotion of services such as Policelink, will assist in managing demand and enabling a greater level of focus on the true emergency requests. The opportunities to support this change include:

- Identification of physical location and inserting a voice message advising of event status in their area before passing the caller through to the national operator

- Identification of a repeat caller and redirecting them to a voice message providing automated update on arrival time or other event information before passing the caller through to the national operator

- Emergency Service Organisations publishing information via multi-channel media services

- Creating a more interactive connection between non-emergency and emergency numbers or data services allowing the community to traverse multiple information sources before seeking emergency assistance.

The value in achieving these outcomes is predominantly realised in reducing the volume of calls before they reach the national operator which in turn reduces the flow on volume to the emergency service organisations.

The would require the supplemental information including event updates to be available through the national operator rather than having to be processed and passed through to the emergency service organisation.

The challenge in meeting this outcome is developing a system and process that connects the national operator to the emergency service organisation's systems and data. However, I suggest, the benefits of managing the demand at the first point of contact would outweigh the effort of establishing this capability.

Question 5: The role of the national Triple Zero operator

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?

The national operator plays a vital role in the process of managing calls for emergency assistance and must be maintained. I suggest that in the future the national operator could be more tightly integrated with emergency service organisation services to provide information, receive and process non-voice contacts, and be able to deal with the majority of contacts before they reach the emergency service organisation Triple Zero response services.

As discussed in response to Question 4, improvement in service performance and maximising the focus on true emergency requests through managing the contacts as early as possible in the process chain and directing contacts to the most appropriate response mechanism or information source is proposed.

In delivering this outcome, the role of the national operator should:

- be the primary contact and/or interconnection point for emergency and non-emergency contacts via all channels via multiple short-code numbers

- have access to, or interface with, emergency service organisations systems and information sources providing real-time data to support the reduction in follow up, geographically aligned, or same event contacts

In considering the specific points raised by the Department, I provide the following responses.

- *whether the current model remains appropriate for the Triple Zero service of the future*

As noted above, it is my opinion that the current model is only appropriate in a voice only service provision.

The requirement to meet community expectation and to accommodate changing technology indicates the future model should be one in which data, voice, and information become indiscernible and that the national operator becomes the access or interconnection point for all interactions.

The national operator should provide a seamless interface between emergency and non-emergency contacts.

That the national operator by using these synergies manages a greater number of responses at the first point of contact and only those requiring actual response or support are progressed to the emergency service organisation's emergency or non-emergency service.

- *how the underlying expectations for the service translate into specifications for a competitive tender process*

The changed relationship and service provision will take some time to develop and deliver. The tender should reflect this changing expectation and seek the respondent to work with the Department, ACMA, NECWG-A/NZ, and emergency service organisations in developing a timeline for delivery that this cognisant of the development requirements and the procedural updates required.

The tender must reflect that this is a requirement of the tenderer, not an option.

- *whether new ways of requesting emergency assistance should go through the national operator or directly to emergency service organisations*

The national operator should continue to be the primary contact for voice based contacts. The opportunity is for the national operator to also become the primary and/or interconnection point for non-emergency requests creating a seamless interface between these two types of 'emergency' services.

I propose that all associated numbers should be drawn into a 'family' of short code numbers that are centrally managed to provide seamless interfacing between the services.

It is not envisaged that calls direct dialled to Policelink or other non-emergency services are received by the national operator to be on forwarded, however the system and awareness of the call must be available to the national operator to redirect – or ensure that update information is available to all callers from or into a specific region.

For other non-voice contacts, the option must exist for the national operator to be the first point of contact to maintain consistency and ease of management, both operationally and contractually.

The options to direct non-voice contacts directly to the emergency service organisation needs to be explored as each service is developed to ensure there is no disruption to emergency service organisation capacity or capability.

- *whether the current funding model provides the appropriate cost drivers and incentives*

It appears that the current funding model does not provide appropriate drivers or incentives for the provider of the national operator to improve their service provision and/or expand their service offering in line with community expectations.

To meet the expectations of the community under a revised relationship and service model, the service requires an alternate and sustainable funding model to deliver the future model.

Internationally, communities fund technical improvement in their Public Safety Answer Points (PSAPs) through levies on their telephony accounts. This can equate to a small percentage being directed to the PSAP development from each monthly bill. In the United States, these funds are used to deliver technology and service improvements under the Next Generation 9-1-1 program. As a comparator, imagine if each fixed line and mobile account in Australia contributed $1 per annum toward the improvements expected from this process. I envisage that the development cycle of the improvements envisaged would be brought significantly forward and delivered in an equitable manner across all States and Territories.

The risk of not identifying a sustainable funding model is that development is conducted in an ad-hoc manner and is dictated by government funding cycles rather than focussed on continuous service improvement to meet changing community expectations and industry development.

- *the practicalities of any proposed changes to the national operator arrangements*

The transformation to accommodate the level of change proposed is not something that can be achieved in a short time frame.

It will require commitment from Federal, State and Territory agencies, the national operator, and sector organisations such as NECWG-A/NZ to develop a model in which the transformation can be achieved in a timely and nationally consistent manner.

The logistics and practicalities of reaching the proposed level of change will require a long term engagement with the national operator, with stated outcomes, and a framework in which the planning and delivery of the transformation can be committed to.

This planning will require the commitment and sustainable funding of the national operator to contribute to its operation and continued development.

- *what transitional arrangements would be needed to ensure continuity in service should changes be made to the model*

This will be dependent on the outcome of the tender.

If the current provider remains, the transitional arrangements will be minimised, other than to establish the capability and contractual arrangement to support the transformation activity.

If a new provider is identified, it would be expected that the current provider will make available all operating procedures and supporting systems that would reasonably be expected to support the new service provider such as IVR recordings, etc.

The current provider would be expected to maintain the operation of the current service to the contracted standard until the date of handover.

It may also be determined that multiple providers are identified based on the service type, e.g. voice, text, automated alarms, etc. In this instance, and while it may be that the voice component will remain with the current provider, each service will require an implementation plan that defines the deliverables and includes its interaction and interface with emergency service organisations and between other national operator services.

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.

a) ***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?***

It is my opinion that the current regulatory framework is suitable to manage the requirements of the ECS although some refinement to reflect current capability and a more agile approach to address changing needs in the future is required.

For example, the determination notes that carriers are to 'provide automatic information about the phone number and the caller's location, with further information available upon request by an emergency service organisation'. This is current being challenged by the developments in the carrier sector and by industry such as car manufacturers. The regulatory framework needs to accommodate these changes as they arise in an agile manner.

It is my opinion that the cost of calls to the Triple Zero service should remain free of charge. However, to achieve the technological and service improvements envisaged by this discussion paper, the current levy on carriers would appear insufficient to achieve the desired outcome.

As has been the case internationally, an alternate and sustainable funding model is required to support next generation system and service development and integration. There are many examples of small imposts on customer's accounts being used for the improvement of emergency communications technologies and services. This is particularly demonstrated in the U.S. Next Generation 9-1-1 program whereby these funds are used to deliver technology and service improvements to the PSAPs.

An emerging risk of the U.S. model over time though is that as traditional carrier based billing accounts are replaced by numerous accounts held through IP providers, the ability to maintain a levy supporting the Triple Zero service improvements, unless regulated on these non-traditional accounts, will become increasingly difficult and the capability to sustain and continuously improve service delivery will be diminished.

It is my opinion that the carriers must continue to make available the IPND into the foreseeable future and also to continue to source improvements to its data quality.

While the transition to VoIP and other types of services will reduce the effectiveness of the database, it is important to maintain subscriber information – particularly for static VoIP services, so that emergency services are able to respond in a timely manner. Again, this will require a level of legislation and regulation to compel providers of these services to capture and provide subscriber information to emergency services.

b) The Department welcomes information from the telecommunications industry, when responding to this question, on how much it costs industry to meet the existing regulatory requirements in relation to the Triple Zero service.

Nil Response

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?

As with most industries, the role of innovators is vital to the continued improvement of the Triple Zero service through development of new ways of communicating and alerting emergency services to critical incidents. The emergence of the smart vehicle with on-board intelligence systems, smart applications measuring personal health, and automated monitoring systems that can identify anomalies and raise alarms are all contributing to the future operation and function of the Triple Zero service.

It is important though, that these innovations are delivered against standards that provide a consistent methodology and interaction framework with Triple Zero service, the national operator, and emergency service organisations to avoid the need for duplication and the creation of siloed service arrangements.

These standards and guidelines can be used by innovators in the construction of their products, and by the national operator and ESOs when developing or procuring their receiving systems.

The role of the innovator needs to be enhanced to ensure the Triple Zero service is maximising its opportunities to provide an efficient and effective service to the community and delivering consistent outcomes.

To achieve the level of compliance, and recognising that a number of innovations (such as in-vehicle telematics) are being developed without reference to, and an expectation of interaction with, Triple Zero, there needs to be a capability to develop standards that can be

projected into the future against which innovators will be compelled to adhere to. An example of this is in Europe where manufacturers of in-vehicle emergency alarming systems have been issued with a standard that they are to comply with by 2017.

To achieve this level of change, an appropriate arrangement needs to be in place in which the standards can be developed by, and with, the users of the service (i.e. the emergency service organisations, the national operator, carriers, etc.) and administered by the regulator (i.e. the Department of Communications or ACMA). This arrangement can form part of the governance arrangements of the Triple Zero service.

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?

The traditional national cooperative model has been successful within the traditional Triple Zero service arrangements.

This risk of this current arrangement is that the operational requirements and improvement activities do not deliver the community access outcomes envisaged within the timeline expected.

It is important that a separation of responsibility is maintained within the governance model to ensure the accountability is clear and that 'the writer of the cheque is not the same person that sent the invoice'.

As noted in response to question 7, within the governance arrangements there is value is having one group developing the standards while another administers the implementation and compliance to the standard.

The identification or establishment of a dedicated body representing multi-jurisdictional interests that supports development and improvement of the Emergency Call Service, and works in conjunction with the regulator and legislator to develop an innovative framework will ensure the goals of the review and community expectations are addressed in a nationally consistent manner.

This dedicated body could develop the standards and provide guidance to decisions and inform legislative and regulatory governance of the Triple Zero service. They can also provide a connection between industry and the sector in terms of promoting innovation or maintaining a watching brief over development by industry that may impact on the Triple Zero environment.

The 'governance' body could monitor community expectations and guide development of the standards and development of the service, as well as manage the associated legislative and regulatory arrangements including compliance against the standards.

Both levels of support require multi- jurisdictional support. This already exists in part through both the Emergency Call Service Advisory Committee (ECSAC) at a governance level, and through the National Emergency Communications Working Group – Australia/New Zealand (NECWG-A/NZ) at a developmental, standards and operational guidance level.

In the emergency services sector, the interested parties also include the Attorney-General's Department whose focus is on the operational aspects of emergency management.

I propose the Department strongly consider and support the establishment of a more structured, yet respectively independent, governance arrangement that includes the Department (including ACMA and ECSAC), the Attorney-General's Department, and the States and Territories through the National Emergency Communications Working Group – Australia/New Zealand, as a vital component to the effective development and delivery of the future Emergency Call Service and function of the national operator.

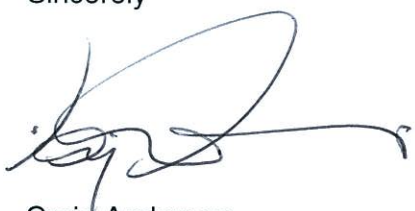
I propose that a two tiered model through which:

- ECSAC provides governance over the Emergency Call Service including meeting the outcomes of this review and delivering on community expectations, and
- NECWG-A/NZ provides the development of standards, operational advice, and industry engagement capability.

It is important that while these two groups form the basis of the Triple Zero governance environment, that each retains an independent perspective to ensure that there is opportunity to debate and develop the most effective solutions to the needs of the service. It is equally important that both groups are sustainable in both human and financial aspects. I suggest that there is an opportunity to use the proposed alternate funding arrangements for both delivery of improvements to the service as well as investigations and development of the associated standards and governance arrangements.

I hope my responses are useful in your considerations. Again, thank you for the opportunity to comment on this vital service.

Sincerely



Craig Anderson

19 August 2014