



5 September 2014

Ms Sylvia Spaseski  
Assistant Secretary  
Consumer Access  
Department of Communications  
GPO Box 2154  
CANBERRA AT 2601

Via email: [Sylvia.spaseski@communications.gov.au](mailto:Sylvia.spaseski@communications.gov.au); [triplezeroreview@communications.gov.au](mailto:triplezeroreview@communications.gov.au)

Dear Ms Spaseski

Optus appreciates the opportunity to respond to the Department of Communication's Discussion Paper on the *National Triple Zero (000) Operator* (the Review).

Firstly, Optus endorses the joint submission to the Review by Communications Alliance and the Australian Mobile Telecommunications Association (AMTA) (the Associations).

Specifically, Optus supports the Association's view that:

- the Review raises a complex set of policy, regulatory, governance, technical and operational issues that warrant more detailed examination;
- the key issues raised - the preparation of a tender for the continuation of delivery of existing voice services by the Triple Zero operator by 23 June 2016 and developing a policy approach to future emergency communication - should be separated into two work streams and considered in further depth.

Also, Optus supports the two work streams being conducted in parallel and initiated as soon as possible. This approach will ensure that establishing Australia's policy approach to next generation emergency communication services is not further delayed by the development of the shorter term objective of continuing to deliver triple zero voice services.

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Secondly, additional comments on the Review are provided below.

#### **NATIONAL RELAY SERVICE (NRS) AND THE TELECOMMUNICATIONS UNIVERSAL SERVICE MANAGEMENT AGENCY (TUSMA)**

It is Optus' strong view that customers of all service providers must have equivalent access to emergency communications services, including Triple Zero.

In terms of future contracts let by TUSMA, Optus recommends that care be taken so that the types of past mistakes made with the NRS contract are not repeated. The technical

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implementation in the current NRS contract favor Telstra customers, with Optus and Vodafone customers encumbered with communication delays not experienced by Telstra customers.

### **DELIVERING 'SUPPLEMENTARY' EMERGENCY COMMUNICATIONS SERVICES ON A COMMERCIAL BASIS**

The development of a new policy and regulatory framework to support future emergency communications services should ensure innovative approaches to support the delivery of new supplementary emergency communications services on a commercial basis are not stifled.

The following example illustrates how such supplementary services are already being delivered on a commercial basis to enhance the capability of emergency communication services.

Optus and Mnet recently partnered with Queensland Fire and Emergency Services to provide an app (INCSnap) to capture and manage sensitive information and images during the early stages of an emergency. The app provides Queensland fire fighters with the ability to capture both impacts and the co-ordinates of a fire's location using a smartphone in a secure and organised way so that data can be quickly provided to the control centre to assist manage an incident response.

### **ALIGNMENT OF TECHNICAL SOLUTIONS WITH INTERNATIONAL STANDARDS**

In Europe and North America, the development of emergency communications services beyond just voice services is well advanced. From a consumer's perspective, the gap in expectations of what mobile devices can deliver in an emergency situation will only continue to grow. The European and North American markets are expected to drive the specification and availability of equipment to support future emergency communications services. Therefore Optus recommends that technical solutions for future emergency communication services are closely aligned with international practice.

### **TRANSPARENCY IN FUNDING ARRANGEMENTS**

There is a need for increased transparency in funding arrangements for emergency communication services and structural separation of the Emergency Call Person (ECP) function from any other operations of the successful tenderer.

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Optus considers that the Review provides a unique opportunity to ensure that the current delivery of triple zero voice services is as efficient and effective as possible and develop a legislative framework that establishes the policy objectives for future emergency communications in Australia.



Optus looks forward to continuing to closely engage with the Department as the policy development process progresses.

Yours sincerely

A handwritten signature in blue ink, appearing to read "M Elsegood".

Michael Elsegood  
Manager, Regulatory Compliance and Safeguards