



www.triplezero.gov.au

21 August 2014

Triple Zero (000) Operator Review
Department of Communications
GPO Box 2154
CANBERRA ACT 2601

Dear Sir/Madam,

Re: Review of the National Triple Zero (000) Operator

Thank you for the opportunity to provide comment as part of the Commonwealth Government's review of the National Triple Zero (000) Operator. The comments attached (Appendix A) are provided on behalf of the Triple Zero Awareness Work Group (TZAWG) and focus on its areas of expertise; namely the ongoing national promotion of the Triple Zero (000) number and Emergency Call Service, and the education of the Australian community and visitors to our country.

TZAWG has been active since mid-2008 under approved Terms of Reference and reports to both the Emergency Call Service Advisory Committee (chaired by ACMA) and the National Emergency Communications Working Group A/NZ. Current membership of TZAWG includes representatives from State- and Territory-based Police, Fire and Ambulance call-taking agencies, Government agencies and telecommunications industry partners.

TZAWG has been very successful in developing initiatives aimed at improving the community's awareness of Australia's national emergency number. The review of the National Triple Zero (000) Operator is a timely opportunity to address a number of long-standing problems, foremost among these being to ensure ongoing community education and awareness of this critical public service are properly managed and funded at the national level.

For your consideration.

Yours sincerely

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An initiative of the Australian Government, State and Territory Emergency Services

The Triple Zero service of the future

Question 1: Community expectations

It is commonly accepted that the 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?

TZAWG strongly agrees that callers need an emergency call service that is “contactable anytime, anywhere, easily, quickly and free of charge”. From the caller through to connection to an Emergency Service Organisation, it must be ultrareliable and have the capacity to cope promptly with peak events, which generate a sharp rise in the number of emergency calls to be managed. Of greatest importance to TZAWG is ensuring that the future Triple Zero (000) service must be well publicised, so that all Australian residents and visitors, regardless of age and language, immediately know the correct number to call and can use the service when they encounter an emergency. There is no guarantee this need for ongoing promotion and education will be met, as the initiatives delivered by TZAWG are dependent on it successfully applying for external grants to fund promotion of what is a vital public safety service and part of Australia’s national critical infrastructure.

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?

TZAWG believes that one of the greatest challenges facing the sector is the ongoing presence of other nation’s emergency numbers on Australian media. It is pointless investing in the best possible technology, functionality and reliability if the public does not know the correct number to ring in an emergency. The nightly existence of North American and other emergency numbers unnecessarily confuses Australian residents reporting an emergency, who now may not automatically recall Triple Zero (000) as the correct number. Attempts by Emergency Services to publicise Australia’s national emergency number during programs that mention another nation’s number were rejected by free-to-air broadcasters, while regulatory action was not previously supported by the then Department of Broadband, Communications and Digital Economy. This problem is exacerbated by the fact that callers can actually be connected to the Emergency Call Service by selecting another nation’s number on some mobile phones.

It is therefore a critical priority that the next Triple Zero Operator is required to fund the development and delivery of ongoing promotional and awareness programs that keep Triple Zero (000) ‘front of mind’ for the Australian community. This would require a Governance Council to be established by the new Triple Zero Operator, with representation from the Commonwealth Government, Emergency Services, the telecommunications industry and the community. The Governance Council’s role would include ensuring consistency through the alignment of State- and Territory-based campaigns and initiatives to national policy and projects.

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?

TZAWG acknowledges that technology and community expectations may provide the impetus to expand Triple Zero (000) beyond the current voice-only service. Regardless of what is the emergency call service's future model and functionality, TZAWG strongly believes that its ongoing promotion of the national emergency number and service must be a fundamental responsibility of the new Triple Zero Operator. Whether their 'call' is by voice, text or vision, users must know how to access the Emergency Call Service, the service's limitations (if any) and what to expect when their call is answered.

As the service evolves, potential users arrive in Australia or reach an age where they may require assistance from emergency services, the need for ongoing national promotion and education also grows. The new Triple Zero Operator, properly funded and structured, is best placed to meet this need.

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?

First and foremost, the most critical piece of information that Triple Zero (000) callers need is the knowledge of which number to ring if they encounter an emergency and require assistance. This fact reinforces the need for the constant, ongoing national promotion of Triple Zero (000) as Australia's national emergency number.

To assist in ensuring that Emergency Services receive the information needed, once callers have connected to the Emergency Call Service, they need to know what to expect in the way their call will be handled. Again, this needs to be part of the service's ongoing education of its potential users. The most critical piece of information users will need to provide is their accurate location, without which Emergency Services will struggle to dispatch the necessary assistance. The community's ever-increasing dependence on mobile phones and other internet-based devices leads to the subsequent increase in uncertainty of a caller's location for Emergency Services, compared to the era when all phones were fixed lines. Accurate caller location information for all Triple Zero (000) calls is required by Emergency Services, delivered to them at the time of the call's connection.

As technology that can access Triple Zero (000) evolves, the promotion and education of Australians and visitors must continue to address these changes. The promotion of this national public safety service – the Triple Zero (000) number and its legitimate use – needs to keep pace with change, to inform and manage the expectations of users. Again, it is TZAWG's firm belief that the best placed organisation to do this is the new national Triple Zero Operator. This promotion should also include the new Triple Zero Operator assuming

responsibility from the Commonwealth Attorney-General's Department to manage and maintain the official Triple Zero (000) website – www.triplezero.gov.au.

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?

TZAWG believes that, fundamentally, there must be general structural, reporting and organisational arrangements that support the functions of a world's best-practice emergency call service. From the Work Group's specific perspective, the Triple Zero Operator must have a contractual requirement and an associated significant funding allocation for the ongoing development and delivery of national Triple Zero (000) awareness programs and initiatives. It is preferable that this allocation includes a grants scheme, available to local agencies so that they can pilot public awareness initiatives that may later be adopted as national programs.

The new Triple Zero Operator must also be required to undertake ongoing research on the service, its users and functions to ensure community expectations are monitored. Improvements should be required to keep pace under the contractual arrangements, which allows for this to inform its users and guide future development initiatives. Research and survey results could be published on the official Triple Zero (000) website – www.triplezero.gov.au – for which the new Triple Zero Operator would have responsibility.

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?

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.

TZAWG will defer to the National Emergency Communications Working Group A/NZ's (NECWG's) position on these issues, but reinforces its previously stated view that significant funding must be available for the ongoing national promotion of Australia's emergency call number and service. Again, the establishment of a Governance Council with appropriate representation would assist in managing this responsibility.

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?

TZAWG will defer to NECWG's position on this issue, but reinforces its previously stated recommendation that significant funding must be available for the ongoing national promotion of and community education about Australia's emergency call number and service. This may include innovation grants being available to third-party providers that aim to constantly improve the emergency call 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?

TZAWG believes that the collaborative arrangements in place for the Work Group – where Emergency Services, Government agencies and industry partners are represented – have proven successful in delivering positive outcomes for the community's awareness of Triple Zero (000). This has been achieved despite the challenges faced by TZAWG in securing funding for its work. While submissions for grants and in-kind support from member agencies have enabled the development of highly successful initiatives, it is TZAWG's strong recommendation that this responsibility needs to sit with – and be funded by – the Triple Zero Operator.

Even with the proven success of the TZAWG's national initiatives, it continues to operate as an unfunded, unincorporated entity: a less than ideal situation when the option exists for the new Triple Zero Operator to assume this responsibility.