



Vodafone Submission to the Review of the National Triple Zero (000) Operator

August 2014

Thank you for the opportunity to provide comment on the operation of the national Triple Zero (000) Operator (TZO).

Vodafone supports the joint AMTA-Communications Alliance industry submission and has the following additional comments.

Vodafone commends the Government initiative to review the operation of this body and recognises the vital work the TZO conducts in filtering hoax and vexatious calls and facilitating the onward delivery of calls to Emergency Service Organisations (ESO's) to provide a vital service to the community and in particular users of the Vodafone network in their time of need.

In reviewing the operation of the TZO it is imperative that it is conducted in a holistic manner and includes all arrangements that facilitate communications with ESO's and recognises and caters for emerging trends of additional communications paths that are favoured by the community.

While VHA recognises the impressive service provided by the TZO, it is important that the service continues to evolve and modernise to meet community expectations. It can no longer be a passive service limited to only one communication medium i.e. voice calls.

In order to meet community expectations it is vital that access to ESO's should be by any form of electronic communication, including, but not limited to: voice calls, sms, mms, social media, video streaming, etc. To fail to meet this expectation could result in serious danger to a person, their property or the community.

A key question is; what is the continuing role for a TZO in the future? An alternative to the current model is the Victorian ESTA model. This shows that it is possible to have a single state based body that could fulfil the function of a TZO for those who need to communicate with an ESO in a particular State/Territory.

This State/Territory based delivery approach could provide a more timely service to local authorities and be at a considerable cost saving for suppliers. For example, VHA would then pay the prevailing interconnect rate and not the currently inflated rate charged to VHA by Telstra as the TZO. As the TZO Telstra has a monopoly position and charges what it wants for connection of calls to the TZO. Telstra does not currently charge the same interconnect fee to each provider and VHA pays a higher rate than another supplier and Telstra has been unwilling to charge VHA the same lower rate.

If the TZO model is to continue to operate it should be on the basis that:

- the TZO is funded entirely by government and does not rely on charging interconnect fee's (e.g. \$2.00 per call) to make up any shortfall; or
- a transparent, standardised interconnect rate should apply for all services connecting to the TZO.

If the TZO is to continue as the primary point of delivery for emergency communications into the future, the review also needs to consider how the TZO could play a more active role in recognising the increasing rise of social media as a popular form of communications and that communications may no longer be a direct call for action, but a call to the



community for help. For example, there have been recent cases where community in the area of a potential danger commented on the situation via social media, using various platforms, and there was no direct call to 000.

Police were only aware of the incident because that particular agency had an active social media monitor in place and were able to take appropriate action based on the information available via social media. If this agency did not have this active social media monitoring in place the consequences could have been dire.

As not all ESOs have such media monitoring in place, there could be a role for the TZO to be both a passive receiver of communications and an active monitor of social media and other communications channels for those in need of emergency assistance, thus providing an equivalent level of service across the Australian community.

Where a person is unaware of how to communicate with an Emergency Call Person their access to an ESO should not rely on the engagement model of ESO's in the particular State/Territory where the emergency occurs.

While the TZO currently only accepts communications via voice calls, any extension to other media platforms should also consider rolling in the capability to provide the solution for 106.

In addition, while the Triple Zero Awareness Working Group has done admirable work to communicate the message about Triple Zero, mainly to youths through its games and in school program, it is clearly insufficient. News commentators often use 'Triple O' and there is still a lack of awareness of the role of 000 and when to use it in the broader community. As part of the review of the TZO there should be consideration of the need for additional funding for community awareness programs and more active engagement with the community on when it is appropriate to use the emergency numbers (i.e. 000, 106 and 112) and when it is not.

There are currently three contracts that VHA is aware of relating to emergency calling, the 000 contract, the 106 contract and the 106 awareness contract. It would seem a better approach would be to have two contracts; the first to provide a combined Emergency Call Person for both 000 and 106 and the second for awareness activities relating to both 000 and 106 to ensure that emergency communications awareness occurs the spectrum of the community.

As the National Emergency Communications Working Group (NECWG) which includes ESO's and carriers, including VHA, is working on a strategy for Next Generation 000, the review of the TZO and its contracted obligations should be sufficiently flexible to allow for the future development of new capabilities and not hinder providing the community new access channels or methodologies to communicate with ESO's.

Opening up additional communication paths brings the risk of more hoax requests, however in many cases a pro-active monitoring approach would to some extent mitigate this as there would likely be additional evidence of a genuine event through multiple channels providing clear evidence that a genuine emergency existed. In addition, stricter penalties could be put into place to name and shame those who made false claims via social media. Financial penalties and device blocking could also be applied.

ESO's usually stress the need for information about the location of the event, the names of affected parties (where applicable) and the nature of the event. Any review of the TZO needs to consider how ESO's might obtain this information. At the present time there is a strong reliance on IPND data, however name and address data captured at a particular point in time may have no relevance to a particular emergency call. The TZO will need to continue to request needed information from the person contacting the TZO. In addition, there should exist ability for device data to be captured and passed on to ESO's, including in app data such as pre-filled name address, medical history and GPS co-ordinates.

Should you require clarification or further information please feel free to contact Alexander Osborne via email: alexander.osborne@vodafone.com.au or on 0425 232 539.