

G596:2013 Communication Support for Emergency Response Industry Guideline

## Submission to Communications Alliance

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## Re: G596:2013 Communication Support for Emergency Response Industry Guideline

The Australian Communications Consumer Action Network (**ACCAN**) thanks Communications Alliance for the opportunity to contribute to its scheduled review of G596:2013 Communication Support for Emergency Response Industry Guideline (**the Guideline**).

ACCAN is the peak national consumer advocacy organisation for communications working to achieve trusted, accessible, inclusive, affordable and available communications and digital services for all Australians.

The Guideline provides a nationally consistent procedure for coordinating and delivering ad hoc communications services during emergencies. It enhances collaboration between Emergency Service Organisations (**ESOs**), Pre-planned Service Providers (**PSPs**), and Secondary Service Providers (**SSPs**) when pre-planned communication services are insufficient, and when additional support is requested by an ESO.<sup>1</sup>

Communication services are essential to ensure the safety of all Australians. As reflected in the Bean Review, there needs to be a consistent and coherent framework for the role of communications during emergencies.<sup>2</sup> This underlines the importance of ensuring Industry Guidelines, Codes, Standards, and Determinations relating to communications during emergencies work in harmony.

As noted in ACCAN's submission for the 2024 document review of the Guideline, consumers consistently express the expectation of organised, timely, and transparent responses and resolutions to communication issues before, during, and after disasters and emergencies.<sup>3</sup> ACCAN acknowledges the importance of industry coordination and cooperation in achieving this goal, especially in situations where infrastructure is damaged, non-functional, or where additional resources are needed beyond existing capacity.<sup>4</sup>

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<sup>&</sup>lt;sup>1</sup> ACCAN, Document review of G596:2013 Communications Support for Emergency Response Industry Guideline (Submission, Communications Alliance, 26 March 2024) 1.

<sup>&</sup>lt;sup>2</sup> Richard Bean, Review into the Optus outage of 8 November 2023 – Final Report (Final Report, March 2024).

<sup>&</sup>lt;sup>3</sup> ACCAN, Document review of G596:2013 Communications Support for Emergency Response Industry Guideline (Submission, Communications Alliance, 26 March 2024) 1.

<sup>&</sup>lt;sup>4</sup> Ibid.

ACCAN recommends Communications Alliance reconfirm the Guideline. In addition, ACCAN proposes that:

- The Guideline be subject to a comprehensive review that examines its use and effectiveness over the past decade. This review should involve input from ESOs, Carriers, and Carriage Service Providers, and should consider current discussions around information sharing frameworks.<sup>5</sup>
- The review be conducted with a view to elevating the Guideline to the status of an Industry Code, reflecting the essential nature of communications support during emergencies.<sup>6</sup>

We thank Communications Alliance for the opportunity to comment on the Guideline. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact Dr Amelia Radke, Senior Policy Adviser, at <a href="mailto:amelia.radke@accan.org.au">amelia.radke@accan.org.au</a>.

The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers. ACCAN is committed to reconciliation that acknowledges Australia's past and values the unique culture and heritage of Aboriginal and Torres Strait Islander peoples.

<sup>&</sup>lt;sup>5</sup> Ibid.

<sup>&</sup>lt;sup>6</sup> Ibid.



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