

28 March 2013

Manager, National and Community Interests  
Australian Communications and Media Authority  
PO Box 13112, Law Courts  
Melbourne, Victoria, 8010  
Email: EmergencyCallServices@acma.gov.au



Dear Sir

**Re: Satellite services and the emergency call service Consultation Paper**

Communications Alliance welcomes the opportunity to make a submission on the draft amendments to the *Telecommunications (Emergency Call Service) Determination 2009* that propose to tighten the Triple Zero (000) emergency call service requirements that apply to satellite phone services in Australia.

In general Communications Alliance supports the paper but would like to emphasise the need to have a broad exemption approach that allows for technological change and new innovation. Specifically, Communications Alliance would like to provide the following comments:

- we support the distinction which the ACMA makes between handheld voice enabled devices and other voice and non-voice enabled satellite devices
- we suggest that the ACMA be guided by satellite industry on appropriate exemptions from the proposed regime
- recognising that satellite companies (as opposed to the CSP holding the direct billing relationship with the end-user) rarely have a direct relationship with end-users in these cases, we suggest that the ACMA not require satellite companies to collect and hold relevant customer information in addition to the CSP holding the direct billing relationship with the end-user, as such a requirement would be almost impossible to meet
- that the ACMA should focus on the CSP holding the direct billing relationship with the end-user customer to ensure vital customer information is recorded and stored for use in emergency situations
- we suggest that the ACMA consider exemptions for all services, other than VoIP services, delivered over non-voice enabled satellite devices

Communications Alliance also understands that individual organisations will be providing separate submissions to the ACMA in response to the consultation paper.

Please contact Mike Johns on (02) 9959 9125 if you have any further questions with regards to the points raised in this submission.

Yours sincerely

A handwritten signature in black ink, appearing to read "John Stanton". The signature is written in a cursive style with a large, stylized initial "J".

John Stanton  
**Chief Executive Officer**