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Australian Communications and Media Authority (ACMA)

40 Cameron Ave, Belconnen ACT 2617

To whom it may concern,

Subject: Ensuring device safety with In-Country live testing

I am writing to highlight the importance of live in-country testing for cellular devices, especially those responsible for critical functions like emergency services. As Australia's telecommunications sector continues to advance, it is essential to address the limitations of overseas simulation testing and prioritise in-country validation to ensure that devices operate reliably within Australia's specific network infrastructure.

Comtest Laboratories has a deep history in telecommunications testing, having been formed as part of Telecom in 1982. Following its privatisation in 1996, Comtest has become a leader in providing safety and compliance testing services. We are proud to be both a NATA-accredited telecommunications test laboratory and a JAS-ANZ accredited certification body, ensuring that we meet the highest standards of integrity, quality, and reliability in our testing practices.

Our long-standing expertise positions Comtest as an authority in ensuring that devices comply with Australian Standards and are fit for purpose within the national telecommunications landscape.

While overseas laboratories provide comprehensive simulation testing, these controlled environments cannot fully replicate the real-world conditions found on Australian networks. Devices may pass overseas testing but fail to perform under Australia's network demands, particularly in high-stakes situations involving emergency services like Triple Zero.

At Comtest, we firmly believe that live, in-country testing is the only way to guarantee that devices will function as intended across Australian network conditions. This type of testing ensures that devices interact with local network infrastructure in real time, giving accurate and reliable data on how they will perform in everyday and emergency scenarios.

In our experience, while simulation testing can provide valuable theoretical data, it cannot account for the unique complexities of Australian telecommunications networks. Here are some of the key limitations:

Network Variability: Simulated tests fail to capture the real-world variability of live networks, such as interference, peak traffic conditions, and network drops.

Network simulations can be more forgiving. Network Simulations allowing calls to proceed that would otherwise be rejected by a live network.

Firmware and Software Glitches: Live, in-country testing uncovers software and firmware issues that are often missed in controlled simulations, especially when devices need to interact with local network configurations.

At Comtest, we are dedicated to ensuring that all devices, especially those related to telecommunications and emergency services, meet the highest standards of safety and performance. While simulation testing by overseas laboratories can serve as an initial assessment, live testing in Australia remains critical for ensuring devices meet local standards and function reliably under real-world conditions.

As a NATA-accredited laboratory, Comtest is uniquely positioned to deliver the in-country live testing that guarantees compliance with critical Australian standards, including AS/CA S042, which mandates support for emergency calls. By prioritising local testing, we can ensure that any potential issues are identified and resolved before devices reach Australian consumers.

Our work at Comtest ensures that Australians can rely on their devices to function in emergency situations, and we remain committed to providing the highest level of testing and certification services.

As Australia's telecommunications networks continue to evolve, we believe it is crucial to adopt comprehensive in-country testing protocols that ensure both safety and reliability. Comtest stands ready to collaborate with the ACMA, Government and industry partners to implement rigorous testing standards and support the continued safety and resilience of our national telecommunications infrastructure.

I would welcome the opportunity to discuss further how Comtest can assist Optus in advancing these efforts. Thank you for your consideration, and I look forward to working together to enhance device safety across the country.

Yours sincerely,



Peter Dwyer
CEO, Comtest Group

