

Proposal to amend the ECS Determination  
Submission by Alan Hughes

[REDACTED]

The current proposal can only be described as a poorly thought out knee jerk reaction, aimed to maximise the profit of the telephone companies and handset manufacturers, at the unnecessary expense of the Australian public and overseas visitors. It essentially mandates the complete denial of all communications, voice and data, because their handset hasn't been certified by the telco as being able to access one particular service. An overseas arrival can find themselves completely cut off without warning, especially when language differences are considered, with not even data access to find out what they need to do.

At a minimum the telcos must be required to allow **all** compatible handsets, not just the ones they choose to verify.

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A more appropriate interim measure would be warning that emergency call may be unavailable, with an alternative standard number (13xxxx) available, with the caution that this is only available through their subscribed network.

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A large part of the real problem is the absolute dumpster fire that is VoLTE compatibility for emergency calls, and the use of proprietary 'profiles'. Many handset manufacturers have chosen to sidestep this issue by forcing emergency calls to 2G/3G networks, even when 4G VoLTE could work, and I personally don't really blame them for this interim measure.

The first step in a real solution is resolving the VoLTE mess, requiring all networks and handsets to support a baseline compatibility, "open market profile" meets this requirement. Optus and Vodafone already support this. Only Telstra uses an incompatible configuration, attempting to force people to use handsets sold by them.

After that, the handset manufacturers should be required to provide updated firmware to any phone with 4G VoLTE, by a set date. This would need to be enforced by some means:

- daily fine for each handset model not compliant;
- ability of handset owners to demand a full refund plus compensation for the effort of acquiring a new handset and transferring data.

The latter may be a more effective incentive.

Separately, I consider the current fixed profile system of 4G voice to be badly designed. Most importantly it means a telco **can't** change their profile, ever, because it's embedded in every handset. A baseline function, which real-time negotiated extension allows flexibility, even within a network or based on real-time demand.

Thank you for taking the time to read this submission.

Alan Hughes