



Transport
for NSW

Transport for NSW

Submission to Australian Communications and
Media Authority-
Telecommunications (Customer Communications
for Outages) Industry Standard 2024

1. Executive Summary	3
2. Consultation Questions	3

1. Executive Summary

Transport for NSW (TfNSW) welcomes invitation to comment on the ACMA's Telecommunications (Customer Communications for Outages) Industry Standard 2024.

Transport Asset Holding Entity (TAHE) possesses a carrier licence, and Sydney Trains is operationally responsible for fulfilling the carrier obligations under the Telecommunications Act 1997 (Cth).

TfNSW operates Sydney Trains' Digital Train Radio Systems (DTRS) network as a private network for the purposes of rail operations. As such TfNSW requests that the standard be amended to clarify that the class of carriers and carriage service providers who own and operate networks for the primary purpose of rail operations to be exempted from this standard (detailed at question 5).

TfNSW is supportive of the notification obligations of the draft standard as a user carriage services from other providers.

2. Consultation Questions

Question 1: Does the draft standard fulfil the objectives and content requirements of the direction? If not, please explain why and describe any alternative and/or additional approaches that could be used to meet these.

TfNSW supports a regulatory framework to ensure stakeholders have the means to know when telecommunications services are unavailable, and appropriately manage their expectations for the restoration of services.

However, the standard does not adequately account for different classes of carriers. Sydney Trains is responsible for the operation and maintenance of the Digital Train Radio Network (DTRS), a 2G-based private cellular network used for rail operations. TfNSW seeks further to clarification with Australian Communications and Media Authority (ACMA) within the standard about classes of carriers to which may be exempt, such as rail operators.

Question 2: Is the definition of a major outage appropriate? If not, why not?

Private networks like the DTRS may not fulfill the criteria for major or outage based on the number of services in operation, given the limited scope of operations these private networks support. But a complete DTRS outage can trigger a major outage event considering its an outage for the whole network. Nevertheless, TfNSW wishes to request for an exemption from this standard on the basis of class of carrier.

Question 3: Does the definition of ‘significant local outage’ meet the objective of the direction that it should capture outages that are lesser in scale than major outages, but have a significant impact on local communities?

Private networks like the DTRS may not fulfill the criteria for local significant outage based on the number of services in operation, given the limited scope of operations these private networks support. Nevertheless, TfNSW wishes to request for an exemption from this standard on the basis of class of carrier.

Question 4: Is it appropriate to exempt planned outages and outages caused by natural disasters from the definitions?

. Although planned outages can have similar consequences to unplanned ones, their planned nature allows for better preparedness. This enables more effective impact mitigation and advance communication with stakeholders. Therefore, it may be beneficial to categorise planned outages separately, with lighter notification requirements.

It may be appropriate to exclude outages caused by natural disasters noting G663:2022 Telecommunications – Emergency Communications Protocol available for the emergency coordination.

Question 5: Are there certain classes of carrier and carriage service provider that should be exempt from the requirements of the standard? Please explain your answer and give reasons for your position.

TfNSW requests that the ACMA consider exempting carriers and carriage service providers where the sole or principal use of the carriage service provided by that carrier or carriage service provider is used by a rail corporation to carry communications necessary or desirable for the workings of train service, or where the sole or principal use of the unit is use by a State or Territory transport authority to carry communications necessary or desirable for the workings of the following services:

- (a) train services of a kind provided by the authority;
- (b) bus or other road services of a kind provided by the authority;
- (c) tram services of a kind provided by the authority.

If the above exemption is not granted, TfNSW would like to emphasise that as the DTRS network has no identified public end-users, it requests an exemption from the requirements of clauses 10(1)(a) and 10(2) of this standard.

TAHE currently holds a carrier license. Sydney Trains is responsible for the operation and maintenance of the DTRS network supporting rail operations with GSM-R technology in the 1800MHz band. The DTRS network facilitates secure, two-way selective voice and data communications between train drivers, guards, track crews, and network control personnel, including signallers, train controllers, and mechanical and operations supervisor controllers across the Sydney Trains network. The DTRS network is also used to carry train movement

authority and signalling information. The DTRS network is primarily for Sydney Trains' use, meaning any outages affect only Sydney Trains operations.

The Sydney Trains DTRS network does not support a sufficient number of services to cause a major or significant local outage. However, a complete outage of the DTRS network can be classified as a major outage event, as the definition of a major outage encompasses all carriage services provided by a carrier or carriage service provider within a State or Territory. But the notification obligations proposed are overly onerous for a private network.

In the event of a DTRS outage, all Sydney Train services will be suspended, and this information will be shared with the public. Therefore, the occurrence of a DTRS outage is already communicated to the public and other stakeholders.

Question 6: Should the standard deal with matters differently for different classes of end-users of carriage services supplied by carriers and carriage service providers?

As per question 5, TfNSW recommends differentiating between various classes of carriers, as not all carriers interact with them through commercial agreements. Sydney Trains does not offer carriage services to public users beyond its own operations.

Question 7: Are the proposed requirements robust and feasible?

TfNSW seeks exemption to this standard on the basis of class of carrier.

The notification obligations proposed are overly onerous for a private network.

Question 8: For carriers and carriage service providers, what are the likely costs and benefits of implementation for your organisation? (Please provide specific cost estimates in your response.) Are there alternative ways to achieve the objective of the direction that would be consistent with its terms and provide for lesser costs or greater benefits?

TfNSW seeks exemption to this standard on the basis of class of carrier.

If the exemption is not granted, implementing this process will incur significant costs, although the exact amount has yet to be determined.

Question 9: We are seeking views, and the reasons for them, on the earliest practical date for the standard for major outages to commence in full. This must be no later than 31 December 2024.

TfNSW seeks exemption to this standard on the basis of class of carrier.

If the exemption is not granted, TfNSW does not believe that the necessary processes can be implemented by 31 December 2024 to meet the obligations of the proposed standard.

Question 10: We are seeking views, and the reasons for them, on the earliest practical date for the standard for significant local outages to commence in full, noting that this must be no later than 30 June 2025.

TfNSW seeks exemption to this standard on the basis of class of carrier.

If the exemption is not granted, TfNSW does not believe that the necessary processes can be implemented by 30 June 2025 to meet the obligations of the proposed standard.

Question 11: We are seeking feedback on whether there are:

- Additional matters aligned to the objectives which should be included in the standard?
- Matters included in the draft standard for which alternative arrangements should be considered?

Please provide evidence to support your position.

As per the previous answers, TfNSW recommends that alternative arrangements should be considered for classes of carriers such as Sydney Trains who operate private networks for rail operations.