

Chair and Agency Head

Ms Joanna Abhayaratna
Executive Director
Office of Impact Analysis
Department of the Prime Minister and Cabinet
1 National Circuit
BARTON ACT 2600

Email: Helpdesk-OIA@pmc.gov.au

OIA reference: OIA24-07466

Dear Ms Abhayaratna

Impact Analysis – Second Pass Final Assessment – amendments to the ECS Determination

I certify that the attached Impact Analysis (IA), prepared by the Australian Communications and Media Authority (ACMA) concerning options to improve mobile phone access to the Triple Zero (000) Emergency Call Service, meets the requirements set out in the Australian Government Guide to Impact Analysis and is consistent with the 6 principles for Australian Government policy makers.

The revised IA addresses the feedback provided in your letter of 10 October 2024 and discussed with our staff in a meeting held on 11 October 2024.

We have strengthened the sections relating to cost benefit and included an analysis of stakeholder submissions received from our consultation process.

Specifically, we have:

- analysed the costs and benefits of Option 3 on industry self or co-regulation
- revised the analysis of estimated benefits for each option, including
 - estimates of avoided deaths (and injuries) based on the expected (or assumed) rate at which customers transition to devices that will be able to call Triple Zero without relying on the 3G Network over the next ten years
 - distributional analysis with quantification of impacts, where possible, supported by evidence from consultation and other sources.
- discussed the unquantified benefits as part of the 'likely net benefit analysis'
- analysed areas of agreement and disagreement from consultation, including explaining how stakeholder views have shaped the options
- outlined why a further delay in the full 3G switch off is not possible in the discussion on 'what policy options have been considered'
- analysed feedback from the public consultation, including explaining how stakeholder views have shaped the options or informed the analysis
- reframed the section on Regulatory Burden estimates to better reflect language from OIA's Regulatory Burden Measurement Framework
- updated the evaluation section with additional questions.

Accordingly, I submit the IA to the Office of Impact Analysis (OIA) for second pass final assessment.

I thank your office for working with the ACMA throughout this process.

The ACMA contact for this matter is Craig Riviere, Executive Manager, Telecommunications Safeguards and Numbers Branch at craig.riviere@acma.gov.au or on 02 6219 5533.

Yours sincerely

Nerida O'Loughlin PSM

17 October 2024

Encl: Copy of revised Impact Analysis – Requirements to identify and manage mobile phones unable to access the Triple Zero (000) Emergency Call Service