



6 May 2024

The Chair
Senate Environment and Communications References Committee
Parliament House
Canberra ACT 2600

By email ec.sen@aph.gov.au

Dear Chair

OPTUS OUTAGE UPDATE

We refer to our letter dated 23 January 2024.

In our letter, Optus committed to appoint an independent third party to undertake a review of its processes supporting Optus' welfare check obligations under section 28 of the *Telecommunications (Emergency Call Service) Determination 2019* (the **Determination**). We also committed to implement any recommendations of the independent review, and share its findings and our response, with the Committee.

Singtel Optus Pty Ltd, as parent company of the relevant carriers and carriage service providers, engaged Ernst and Young (**EY**) to undertake a limited assurance review of its current processes. EY tested Optus' processes on 18 April 2024 and concluded its report on 6 May 2024.

Enclosed is a copy of EY's report.

EY did not identify any concerns with Optus' current processes to comply with section 28 of the Determination, however, following control testing of design effectiveness, EY have recommended that Optus implement an ongoing comprehensive formal training plan to support its process.

We are implementing a formal training plan to address EY's recommendations. Once complete, we will submit a copy to EY for their review and feedback to finalise EY's assurance process.

As set out in the report, EY has requested that the report is solely for the Directors of Optus, the ACMA and the Senate Committees and should not be distributed beyond those intended recipients. Please consult with us prior to any publication of this report.

Yours sincerely

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Vice President, Government & Regulatory Affairs

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Singtel Optus Pty Ltd

Compliance with obligations under
Section 28 of the Telecommunications
(Emergency Call Service)
Determination 2019

06 May 2024

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1. Background

1.1 2023 Optus Outage

On 8 November 2023, there was a significant network outage which impacted Optus' networks ("the Outage"). Following the Outage Optus (as the Carriage Service Provider) undertook welfare checks on customers whom Optus identified on 8 November 2023 had made unsuccessful emergency calls as required by Section 28 of the Telecommunications (Emergency Call Service) Determination 2019 (the "Determination"). Optus has since identified there were additional customers who made calls that did not reach the Emergency Call Person during the Outage on whom a welfare check was not undertaken.

Optus has since made changes to its welfare check process and seeks an independent review from Ernst and Young ("EY"). Optus has committed to implementing any recommendations of this independent review and share the findings with the Australian Communications and Media Authority (ACMA) and the Senate Committees.

1.2 The Determination

The requirements of the Determination are outlined as follows:

(1) A carriage service provider must, as soon as practicable after:

(a) becoming aware of a significant network outage that adversely affects a controlled network or controlled facility that the provider owns or operates; or

(b) being notified of a significant network outage under paragraph 27(2)(b),

undertake, or arrange to be undertaken, a welfare check on an end-user who made an unsuccessful emergency call during the outage using an emergency telephone service supplied by the carriage service provider.

(2) Subsection (1) does not apply where:

(a) the carriage service provider cannot identify that the end-user has made the unsuccessful emergency call;

(b) the carriage service provider is satisfied that the end-user subsequently made a successful emergency call; or

(c) the end-user made the unsuccessful emergency call using a public mobile telecommunications service, and the location of the customer equipment from which the call was made has changed since the call was made.

1.3 Scope and Approach

The scope of the independent review includes an assessment of Optus' current activities and processes as it relates to the Determination, in accordance with the requirements of the agreed Statement of Work. As per the agreed Statement of Work:

We will perform the following key procedures/activities in two (2) stages:

Stage 1

- Identify the current processes and controls Optus has in place to perform welfare checks and provide an assurance opinion on its compliance with section 28 of the Determination.

- Make recommendations to improve those processes and controls for performing welfare checks identified in 1, as are necessary, to ensure compliance with the obligations in section 28 of the Determination in the form of a recommendations report.

Stage 2

- By no later than 3 months of notification from Optus that the recommendations have been implemented, provide a brief report of our assessment validating whether recommendations have been implemented, and, where relevant, whether they have been successfully tested.

Given the circumstances of the engagement, in performing the procedures listed above we:

- ▶ Through discussion, enquiries, and observation, obtained an understanding of Optus' compliance framework and internal control environment to meet the requirements of the Determination, as evaluated against the criteria outlined in Appendix A and Appendix B ("Criteria").
- ▶ Through discussion, enquiries, observation and walk throughs, obtained an understanding of Optus' relevant welfare check activities that are undertaken to meet the Determination, as evaluated against the Criteria.
- ▶ Documented any control deviations identified in the design effectiveness testing as evaluated against Optus' compliance with the Criteria.

2. Detailed Findings

Following EY's assessment of Optus' welfare check process against the Criteria as at 18th April 2024, EY performed control testing of design effectiveness as detailed in Appendix C. EY identified (1) one control deviation related to welfare check training. The following recommendation is intended to guide Optus in implementing the necessary remediation actions.

Deviation No: 1	Issue Type: Design
Related Control and Control Description	C.14 All relevant Network and Frontline personnel identified in the end-to-end welfare check review process are provided with formal, ongoing training on welfare check regulatory requirements and any changes to the standard operating procedures. Optus is responsible for identifying a complete and accurate list of personnel, facilitating training sessions timely and monitoring training completion rates.
Finding	<u>Lack of Formal Training Plan and Monitoring</u> Welfare check training sessions are provided on an ad-hoc basis for relevant Network and Frontline personnel. However, as the welfare check process is routinely updated for improvements, there is a lack of a formal training plan to consistently equip staff on an ongoing basis. Additionally, there is inadequate monitoring to ensure training completion and consistent welfare check outcomes. Refer <i>Appendix C</i> for details on the control.
Risk	Insufficient and inconsistently monitored training on the welfare check process can lead to a lack of awareness regarding the latest standard operating procedures and regulatory requirements. This lack of awareness may result in inconsistent welfare check outcomes and potential non-compliance with the Criteria.
Recommendation	Optus should develop and implement a comprehensive formal training plan for the welfare check process. Key actions should include: a) Identifying a complete and accurate list of all in-scope roles/job titles at Optus and any external parties that require welfare check training. b) Developing and deploying welfare training sessions routinely for all new and existing personnel in the identified roles, using a standardised curriculum that is routinely updated to reflect the latest standard operating procedures and regulatory requirements. c) Establishing a centralised forum (E.g., SharePoint) where the latest Standard Operating Procedures, and any other relevant useful resources (E.g., quick user guide document), can be accessed by all new and existing personnel in the identified roles. d) Establishing a system to record and monitor the training status of all personnel, ensuring that training completion rates are satisfactory. e) Implementing a feedback mechanism to assess the effectiveness of the training and making necessary adjustments based on feedback and changes in regulations or procedures.

	f) Setting up a periodic review and audit process to ensure the training program's ongoing relevance and effectiveness.
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Appendix A Optus' definition of a SNO and Welfare Check

Definitions as per Section 6 of the Telecommunications (Emergency Call Service) Determination 2019

Per section 6 of the Telecommunications (Emergency Call Service) Determination 2019, a **SNO** means an unscheduled network failure that adversely affects the carriage of emergency calls over that network in a significant way, having regard to:

- a) the number of customers impacted by the outage;
- b) the likely amount of time it will take to restore carriage services disrupted by the outage; and
- c) the availability of other carriage services that can be used by affected customers to make and receive calls.

and a **welfare check** means the process of checking on the safety and well-being of an end-user including, at a minimum:

- a) if the end-user made an unsuccessful emergency call using an emergency telephone service:
 - (i) attempting to contact the end-user by phone; and
 - (ii) if the phone call is unsuccessful, referring the matter to the police force or service in the State or Territory in which the end-user is located;or
- b) if the end-user made an unsuccessful emergency call using a public mobile telecommunications service:
 - (i) sending an SMS (first SMS) to the end-user requesting that the end-user respond in the manner prescribed in the message;
 - (ii) if no response is received to the first SMS within a reasonable time after the message is sent, sending another SMS (second SMS) containing the same information as the first SMS; and
 - (iii) if no response is received to the second SMS within a reasonable time after the message is sent, referring the matter to a police force or service in the State or Territory in which the end-user is located.

Optus' Definitions

Optus's criteria for a SNO declaration are as follows:

- ▶ Any complete mobile site outage impacting more than 50 mobile sites and lasting longer than 1 hour.
- ▶ Any fixed incident (CVC / NBN outage for example) impacting more than 20,000 customers and lasting more than 1 hour.
- ▶ Any core switching incident where call impacts are observed to more than 20,000 calls above BAU, impacting 000 and lasting more than 1hr.
- ▶ Optus does not include the assessment of the availability of an alternative carriage service given that:
 - ▶ Optus cannot monitor the other carriers' networks to determine whether they are operating.

- ▶ In areas where it is known that Optus is the only carrier, Optus would not be able to contact any affected callers during an outage of our network.

EY did not assess the appropriateness of Optus's SNO criteria.

Furthermore, Optus' welfare check process considers guidance from Industry Guideline G644:2020 Emergency Call Service Protections Requirements Section 3.2 Significant Network Outages Management Process, and the definition of a 'welfare check' as per Section 6 of the Telecommunications (Emergency Call Service) Determination 2019. Refer to Major Process Welfare Check in Appendix C below for more details of Optus' welfare check process.

Appendix B The Telecommunications (Emergency Call Service) Determination 2019 Mapped to Optus' Control Environment

The following table maps Optus' key controls to the corresponding section in the Criteria to assess control coverage over the welfare check requirements.

Section Reference #	Sections from the Telecommunications (Emergency Call Service) Determination 2019	Control reference
28	Section 28: Welfare checks - significant network outages	
	(1) A carriage service provider must, as soon as practicable after:	
	(a) becoming aware of a significant network outage that adversely affects a controlled network or controlled facility that the provider owns or operates; or	C.01
	(b) being notified of a significant network outage under paragraph 27(2)(b),	C.02
	undertake, or arrange to be undertaken, a welfare check on an end-user who made an unsuccessful emergency call during the outage using an emergency telephone service supplied by the carriage service provider.	C.03
		C.04
		C.05
		C.06
		C.07
	(2) Subsection (1) does not apply where:	C.08
	(a) the carriage service provider cannot identify that the end-user has made the unsuccessful emergency call;	C.09
	(b) the carriage service provider is satisfied that the end-user subsequently made a successful emergency call; or	C.10
	(c) the end-user made the unsuccessful emergency call using a public mobile telecommunications service, and the location of the customer equipment from which the call was made has changed since the call was made.	C.11
		C.12
		C.13
		C.14

Appendix C Background, Summary of Test Procedures, and Results of Test

Background:

Optus has identified two teams, the Network Team, and the Frontline Team, as responsible for performing welfare checks during SNOs:

- **Network Team Responsibilities:** The Network team is responsible for managing the infrastructure necessary for emergency communications. This includes promptly addressing SNOs and ensuring complete and accurate extraction of CDRs from network switches. The team follows detailed instructions to manage and report incidents affecting emergency call services. They are responsible for the timely notification of such incidents to senior management, external parties, and the coordination of resolution efforts, which involves detailed scenario checklists and triage processes for different types of network disruptions.
- **Frontline Team Responsibilities:** The Frontline team is directly responsible for executing welfare checks during SNOs. Their duties include initiating contact with affected customers to assess whether they need emergency call service, and any necessary escalation to the state police. They use standardised communication protocols to conduct these checks via phone or SMS. The team also maintains detailed records of all interactions and outcomes of these welfare checks to ensure accountability and traceability.

Description of Controls, Test Procedures and Results of Test:

In the following table, test procedures were assessed against Optus' key controls, and the results of the test that address each risk was developed.

It should be noted that the Criteria does not specify particular controls that an entity is required to design, implement, and operate in order to satisfy the Criteria. Therefore, we have implemented a risk-based approach, focusing on the identification and testing of key controls that are crucial for ensuring adherence to the welfare check requirements.

Criteria Section	Criteria Sections S 28 (1)(a), S 28 (1)(b)			
Major Process	Policy, Governance and Oversight			
Control Reference	Criteria Section Reference #	Control Description	Testing procedures performed by EY	Testing results
C.01	S 28 (1)(a) S 28 (1)(b)	Monitoring of Regulatory Changes All changes to regulatory obligations are monitored by the Regulatory Team. Any changes that have an impact to Optus are assessed and communicated to relevant Optus stakeholders and the Compliance Team in a timely manner. Further, when a regulatory change occurs, the Compliance Team are responsible for confirming that controls related to regulatory obligations are assessed and updated as required.	Inquired with (Regulatory Associate Director) and (Senior Director, Compliance) to determine whether a process exists to ensure changes to the Criteria are monitored, communicated to relevant Optus stakeholders, and updated as required. Note: This test was based on inquiry only, as there have been no recent changes to the Criteria.	No deviations noted.
C.02	S 28 (1)(a) S 28 (1)(b)	SOP: Network & Frontline A Standard Operating Procedure (SOP) detailing welfare check procedures exists for the Network and Frontline team. This SOP clearly defines roles and responsibilities, incident management and triage, definitions (e.g., 'significant network outage'), the timeliness of critical tasks, scenario checklist, data extraction, standardised procedures, and escalation protocols.	Inspected Network and Frontline SOPs to determine whether the SOPs clearly define roles and responsibilities, incident management and triage, definitions (e.g., 'significant network outage'), the timeliness of critical tasks, scenario checklist, data extraction, standardised procedures, and escalation protocols.	No deviations noted.

C.12	S 28 (1)(a) S 28 (1)(b)	<p>Monitoring of Frontline welfare checks</p> <p>All mandatory welfare checks are recorded, updated, and monitored until completion. The Global Contact Centres Duty Director is responsible for finalising the customer contact list to ensure the completeness and accuracy of the welfare checks conducted. Furthermore, the Duty Director is responsible for sending an email to the Welfare Check Response Group confirming that welfare checks have been completed. The excel file with the completed welfare check outcomes is retained in TEAMS site and password protected.</p>	<p>Inspected email evidence sent by the Duty Director to the Welfare Check Response Group to determine whether mandatory welfare checks have been completed.</p> <p>Inspected the excel file of welfare check outcomes to determine whether all mandatory welfare checks are recorded, updated, and monitored until completion.</p> <p>Note: Due to the inherent nature of the incidents (i.e., limited occurrence of an actual 'SNO' event and limited data availability), our test procedures were conducted through a simulated, scenario-based assessment using the updated, documented Standard Operating Procedures for conducting welfare checks in a SNO.</p>	No deviations noted.
C.14	S 28 (1)(a) S 28 (1)(b)	<p>Welfare Check Training</p> <p>All relevant Network and Frontline personnel identified in the end-to-end welfare check review process are provided with formal, ongoing training on welfare check regulatory requirements and any changes to the standard operating procedures. Optus is responsible for identifying a complete and accurate list of personnel, facilitating training sessions timely and monitoring training completion rates.</p>	<p>Inspected evidence of welfare check training sessions conducted for the Network and Frontline teams to determine whether training is conducted periodically for the appropriate personnel and whether training completion is monitored.</p>	Deviation noted, refer to ' 2. Detailed Findings ' for further detail.

Criteria Section	Criteria Sections S 28 (1)(a), S 28 (1)(b)			
Major Process	Data Completeness			
Control Reference	Criteria Section Reference #	Control Description	Testing procedures performed by EY	Testing results
C.03	S 28 (1)(a) S 28 (1)(b)	<p>Data Input: Switches to DCS (Optus' data store)</p> <p>DCS is configured to poll network switches on a periodic basis to receive Call Detail Records (CDRs) which contain emergency call data. DCS receives and stores CDRs files in a complete and accurate manner.</p>	<p>Inspected a sampled hour of input data polled from network switches and stored in the DCS, as well as output data transferred from DCS to TARO for in-scope CDRs.</p> <p>Performed a VLOOKUP using a unique transaction ID in the input listing to the output listing, to determine whether data completeness and accuracy from network switches (the source of truth) to TARO (Optus' regulatory system) was achieved.</p>	No deviations noted.
C.04	S 28 (1)(a) S 28 (1)(b)	<p>Data output: DCS to TARO</p> <p>Batch jobs exists to transfer CDRs files from the DCS Data Store into Optus' regulatory system, TARO. TARO receives CDRs files on a periodic basis in a complete and accurate manner.</p>	<p>Note 1: EY defined the in-scope emergency call data records (CDRs) as follows:</p> <p>1. The audit tested data completeness from switches to the downstream systems. It is understood that if the calls do not reach the switches, the customer's CDRs are not recorded. Under such instance, it is not the Entity's obligation to perform a welfare check.</p> <p>2. The audit included '000' (Triple Zero), '112' and '106' as the emergency service numbers in scope for our assessments of the Subject Matter.</p>	No deviations noted.

			<p>3. The audit considered all Call Data Records (CDR) types (three in total) polled from network switches relating to in-scope emergency service numbers:</p> <ul style="list-style-type: none"> ▶ MSC - for 3G voice calls ▶ VoLTE/VoNBN - for 4G voice calls ▶ DMS/CS2K/C20 - for enterprise voice calls <p>Note 2: Optus does not offer voice services over native 5G networks as of 30 April 2024.</p> <p>Note 3: Due to the inherent nature of the incidents (i.e., limited occurrence of an actual 'SNO' event and limited data availability), our test procedures were conducted through a simulated, scenario-based assessment using the updated, documented Standard Operating Procedures for conducting welfare checks in a SNO.</p>	
C.06	<p>S 28 (1)(a)</p> <p>S 28 (1)(b)</p>	<p>GDC extracting the TARO Extract</p> <p>Nokia GDC is responsible for initiating a manual trigger in TARO to extract Triple Zero, 112 and 106 data from DCS. The parameters used by Nokia GDC ensure data completeness and accuracy.</p>	<p>Inspected Nokia GDC inputting TARO queries and extracting TARO data to determine whether the query of the TARO extract is appropriate to cover the time period of the significant network outage for Triple Zero, 112 and 106 calls.</p> <p>Observed the Nokia GDC confirming the number of rows in each file (Triple Zero, 112 and 106) to determine whether data completeness and accuracy was achieved during file transfer.</p> <p>Note: Due to the inherent nature of the</p>	No deviations noted.

			incidents (i.e., limited occurrence of an actual 'SNO' event and limited data availability), our test procedures were conducted through a simulated, scenario-based assessment using the updated, documented Standard Operating Procedures for conducting welfare checks in a SNO.	
C.07	S 28 (1)(a) S 28 (1)(b)	<p>TARO Completeness: Duty Director's Review</p> <p>The TARO extracts containing failed Triple Zero, 112 and 106 calls are reviewed by Optus' Duty Director to ensure completeness and accuracy of the data. Duty Director checks:</p> <ul style="list-style-type: none"> - The timeframe (e.g., 4 or 8 hours depending on the file) - The coverage of answered and unanswered calls - The screenshot of the query - The timestamp of the switch status. 	<p>Observed the Duty Director verify the appropriateness of the TARO query parameters and the completeness of the extract output, including the timeframe of the SNO, the coverage of answered and unanswered calls, the screenshot of the query, and the timestamp of the switch status; to determine whether data completeness and accuracy was achieved for the TARO extracts.</p> <p>Note: Due to the inherent nature of the incidents (i.e., limited occurrence of an actual 'SNO' event and limited data availability), our test procedures were conducted through a simulated, scenario-based assessment using the updated, documented Standard Operating Procedures for conducting welfare checks in a SNO.</p>	No deviations noted.
C.08	S 28 (1)(a) S 28 (1)(b)	<p>TARO Completeness: 4-Hour Data Reconciliation</p> <p>The Duty Director is responsible for performing a 4-hourly data reconciliation of the TARO extracts to ensure completeness</p>	Inspected the first '4hrly Comparison Workbook' for the initial welfare check and the second '4hrly Comparison Workbook' for the second welfare check to determine whether the data reconciliation performed	No deviations noted.

		<p>and accuracy of failed emergency call data extracts used to perform welfare checks.</p> <p>The Duty Director ensures that:</p> <ul style="list-style-type: none"> - the reconciliation occurs a 4-hour interval from the start of the incident until incident resolution - the initial TARO extract covers the first 4-hours of the incident - all subsequent extracts are run at 4-hour intervals covers the previous 8-hour period - a final reconciliation is performed 4-hours post resolution covering the last 4-hours of the incident. <p>Evidence and results from the reconciliation are recorded and maintained in an Excel workbook, and welfare checks are performed for any variances identified by the Frontline team.</p>	<p>by the Duty Director was appropriately recorded in the workbook.</p> <p>Inspected through the TARO queries that the initial TARO extract covered the first 4-hours of the incident, and the subsequent extract covered the previous 8-hour period for data reconciliation.</p> <p>Note: Due to the inherent nature of the incidents (i.e., limited occurrence of an actual 'SNO' event and limited data availability), our test procedures were conducted through a simulated, scenario-based assessment using the updated, documented Standard Operating Procedures for conducting welfare checks in a SNO.</p>	
C.09	S 28 (1)(a) S 28 (1)(b)	<p>Frontline Welfare Check Initiation</p> <p>The Global Contact Centres Duty Directors sends an email to the responsible frontline team (e.g., Customer Resolution or social media Team) with the Customer Contact List and work instructions to perform the welfare check.</p>	<p>Inspected a sample email from the Global Contact Centres Duty Directors confirming the responsible team assigned for the welfare check (e.g., Customer Resolution or Social Media team), the Customer Contact List, and the work instructions.</p>	No deviations noted.

Criteria Section	Criteria Sections S 28 (1)(a), S 28 (1)(b)			
Major Process	Welfare Check			
Control Reference	Criteria Section Reference #	Control Description	Testing procedures performed by EY	Testing results
C.10	S 28 (1)(a) S 28 (1)(b)	<p>Welfare check: Mobile</p> <p>A welfare check is performed for end users who made an unsuccessful emergency call using a mobile telecommunications service. A first SMS is sent to the end-user to respond with a yes/no. If no response is received to the first SMS within 10 minutes, a second SMS with the same information as the first SMS is sent. If no response is received to the second SMS within 10 minutes, the matter is extended to a police force or service in the State or Territory in which the end-user is located.</p>	<p>Inspected one (1) welfare check sample performed for a mobile service number, for each of the below:</p> <ul style="list-style-type: none"> a) 'Yes' as customer's response requiring assistance in the first SMS b) 'No' as customer's response requiring assistance in the first SMS c) 'Yes' as customer's response requiring assistance in the second SMS d) 'No' as customer's response requiring assistance in the second SMS e) No reply in both the first and second SMS <p>to determine whether the welfare check is conducted within the appropriate timeframe (e.g., 10 minutes) for each of the scenarios. Validated that any uncontactable end-users were referred to the police/ state authorities.</p> <p>Note: Due to the inherent nature of the incidents (i.e., limited occurrence of an actual 'SNO' event and limited data availability), our test procedures were conducted through a simulated, scenario-based assessment using the updated, documented Standard</p>	No deviations noted.

			Operating Procedures for conducting welfare checks in a SNO.	
C.11	S 28 (1)(a) S 28 (1)(b)	<p>Welfare check: Fixed Line</p> <p>A welfare check is performed for end-users who made an unsuccessful emergency call using an emergency telephone service for a total of two (2) attempts every 10 minutes. If the phone call is unanswered, the matter is referred to the police force or service in the State or Territory in which the end-user is located.</p>	<p>Inspected screenshot of outbound call logs with the applicable timestamp, for each of the following:</p> <ul style="list-style-type: none"> a) Answered call in the first attempt b) Answered call in the second attempt c) Unanswered call in both first and second attempt <p>to determine whether the welfare check is conducted within the appropriate timeframe (e.g., 10 minutes) for each of the scenarios. Validated that any uncontactable end-users were referred to the police/ state authorities.</p> <p>Note: Due to the inherent nature of the incidents (i.e., limited occurrence of an actual 'SNO' event and limited data availability), our test procedures were conducted through a simulated, scenario-based assessment using the updated, documented Standard Operating Procedures for conducting welfare checks in a SNO.</p>	No deviations noted.

Criteria Section	Criteria Sections S 28 (1)(a), S 28 (1)(b)
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Major Process	Incident Management			
Control Reference	Criteria Section Reference #	Control Description	Testing procedures performed by EY	Testing results
C.05	S 28 (1)(a) S 28 (1)(b)	Batch Job Monitoring/Incident Management Switches and DCS are configured to automatically alert the Production Support Team upon a batch job failure. All failures are recorded, monitored, and resolved in accordance with SLAs.	<p>Inspected configuration evidence of emergency call batch jobs to determine whether it is configured to automatically send an alert to the Support Team for resolution upon a batch job failure.</p> <p>Inspected a sample of one (1) batch job error and determined that an error notification is sent to the Support Team automatically upon failure, and is recorded, monitored and resolved until resolution.</p>	No deviations noted.
C.13	S 28 (1)(a) S 28 (1)(b)	Incident notification process / triage The Network team is responsible for notifying the relevant internal and external stakeholders (e.g., ACMA, Concentrix, Telstra) when a significant network outage is identified and declared.	<p>Inspected the Network SOP to determine whether the incident notification process/ triage is outlined in the SOP.</p> <p>Inspected a sample SNO notification email sent to the relevant internal stakeholders to determine whether the email contained the incident summary, number of customers impacted, estimated time of restoration, and the contact person.</p> <p>Note 1: Due to the inherent nature of the incidents (i.e., limited occurrence of an actual 'SNO' event and limited data availability), our test procedures were conducted through a simulated, scenario-based assessment using the updated, documented Standard Operating</p>	No deviations noted.

			<p>Procedures for conducting welfare checks in a SNO.</p> <p>Note 2: The audit excluded test procedures that involved engagement with external parties (i.e., ACMA, Concentrix, Telstra) for the purpose of our scenario-based assessment.</p>	
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Singtel Optus Pty Limited

Review of the Welfare Check Process in Compliance with
Section 28 of the Telecommunications (Emergency Call
Service) Determination 2019

Reporting Date: As at 18 April 2024

Limited Assurance Report

06 May 2024

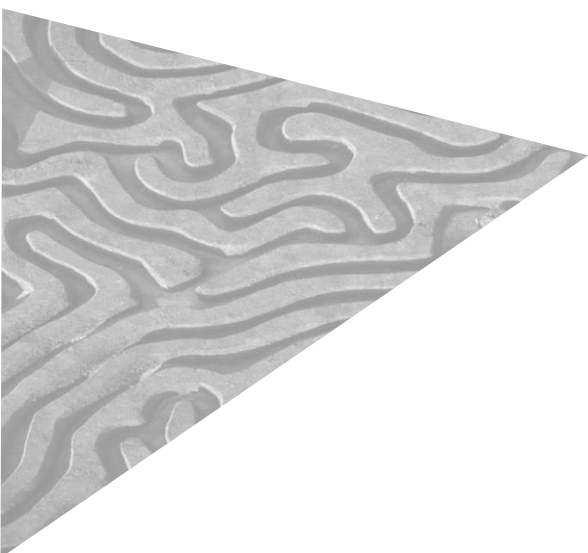


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May 2024

Independent assurance report to Singtel Optus Pty Limited (“Optus”)

Conclusion

We have undertaken a limited assurance engagement on Optus’ Management Statement of Compliance (“Statement”), in all material respects, with Section 28 of the Telecommunications (Emergency Call Service) Determination 2019 (“Determination”) as evaluated against the criteria outlined in Appendix A and Appendix B (“Criteria”), as of 18 April 2024. This Statement will accompany our report, for the purpose of reporting to the Directors of Optus, the Australian Communications and Media Authority (ACMA) and the Senate Committee.

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Statement, that Optus has complied with the Determination, is in all material respects, not fairly presented, as evaluated against the Criteria as at 18 April 2024.

Basis for conclusion

We conducted our engagement in accordance with Standard on Assurance Engagements ASAE 3100 *Compliance Engagements* issued by the Auditing and Assurance Standards Board.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Optus’ responsibilities

Optus is responsible for:

- a. Providing a Statement with respect to the outcome of the evaluation of the compliance activity against Determination, which accompanies this independent assurance report;
- b. Identification of the Determination if not identified by law and regulation;
- c. The compliance activity undertaken to meet the Determination; and
- d. Identification and implementation of controls which will mitigate those risks that prevent the Determination being met and monitor ongoing compliance.

Our independence and quality management

We have complied with the independence and relevant ethical requirements, which are founded on fundamental principles of integrity, objectivity, professional competence, and due care, confidentiality, and professional behaviour.

The firm applies Auditing Standard ASQM 1 *Quality Management for Firms that Perform Audits or Reviews of Financial Reports and Other Financial Information, or Other Assurance or Related Services Engagements*, which requires the firm to design, implement and operate a system of quality

management including policies or procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

Assurance practitioner's responsibilities

Our responsibility is to express a limited assurance conclusion on Optus' Statement of Compliance, with the Determination, in all material respects as evaluated against Optus' current state welfare check process, as at 18 April 2024. ASAE 3100 requires that we plan and perform our procedures to obtain limited assurance about whether anything has come to our attention that, Optus' Statement that Optus has complied with Determination is, in all material respects, not fairly presented as evaluated against the Criteria as at 18 April 2024.

In a limited assurance engagement, the assurance practitioner performs procedures, primarily consisting of discussions and enquiries of management and others within Optus, as appropriate, and observation and walk-throughs and evaluates the evidence obtained. The procedures selected depend on our judgement, including identifying areas where the risk of material non-compliance with the Criteria is likely to arise.

Given the circumstances of the engagement, in performing the procedures listed above we:

- ▶ Through discussion, enquiries, and observation, obtained an understanding of Optus' compliance framework and internal control environment to meet the requirements of the Determination, as evaluated against the Criteria.
- ▶ Through discussion, enquiries, observation and walk throughs, obtained an understanding of Optus' relevant welfare check activities that are undertaken to meet the Determination, as evaluated against the Criteria.
- ▶ Documented any control deviations identified in the design effectiveness testing as evaluated against Optus' compliance with the Criteria.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement and consequently the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Accordingly, we do not express a reasonable assurance opinion on compliance with the Determination.

Inherent limitations

Because of the inherent limitations of an assurance engagement, together with the internal control structure it is possible that fraud, error, or non-compliance with compliance requirements may occur and not be detected.

A limited assurance engagement as at 18 April 2024 does not provide assurance on whether compliance with the Determination will continue in the future.

Restriction on distribution

This assurance report has been prepared in accordance with the requirements of the agreed Statement of Work. Our report is intended solely for the Directors of Optus, the ACMA and the Senate Committees (collectively the "Recipients") and should not be distributed to parties other than the Recipients.

We disclaim all responsibility to any other party for any loss or liability that the other party may suffer or incur arising from or relating to or in any way connected with the contents of our report, the provision of our report to the other party or the reliance upon our report by the other party.

Ernst & Young
200 George Street
Sydney NSW 2000
06 May 2024

Optus' Management Statement

06 May 2024

We, as members of management of Optus, are responsible for complying with the specified requirements of Section 28 of the Telecommunications (Emergency Call Service) Determination 2019 ("Determination") as evaluated against the criteria set out in Appendix A and Appendix B ("Criteria"). We also are responsible for establishing and maintaining effective internal control over compliance with the Criteria. We have performed an evaluation of Optus' compliance with the specified requirements of the Determination, including those described below, as of 18 April 2024. Based on this evaluation, as at 18 April 2024, Optus complied with the following specified requirements of the Determination.

Section 28: Welfare checks - significant network outages

(1) A carriage service provider must, as soon as practicable after:

- (a) becoming aware of a significant network outage that adversely affects a controlled network or controlled facility that the provider owns or operates; or
- (b) being notified of a significant network outage under paragraph 27(2)(b),

undertake, or arrange to be undertaken, a welfare check on an end-user who made an unsuccessful emergency call during the outage using an emergency telephone service supplied by the carriage service provider.

(2) Subsection (1) does not apply where:

- (a) the carriage service provider cannot identify that the end-user has made the unsuccessful emergency call;
- (b) the carriage service provider is satisfied that the end-user subsequently made a successful emergency call; or
- (c) the end-user made the unsuccessful emergency call using a public mobile telecommunications service, and the location of the customer equipment from which the call was made has changed since the call was made.

Yours sincerely /

Peter Kaliaropoulos
Chief Operating Officer

Singtel Optus Pty Ltd
1 Lyonpark Road
Macquarie Park NSW 2113

Summary of Compliance with the Determination

Section Reference #	Sections from the Telecommunications (Emergency Call Service) Determination 2019	Overall compliance assessment
28	Section 28: Welfare checks - significant network outages	
	<p>(1) A carriage service provider must, as soon as practicable after:</p> <p>(a) becoming aware of a significant network outage that adversely affects a controlled network or controlled facility that the provider owns or operates; or</p> <p>(b) being notified of a significant network outage under paragraph 27(2)(b),</p> <p>undertake, or arrange to be undertaken, a welfare check on an end-user who made an unsuccessful emergency call during the outage using an emergency telephone service supplied by the carriage service provider.</p> <p>(2) Subsection (1) does not apply where:</p> <p>(a) the carriage service provider cannot identify that the end-user has made the unsuccessful emergency call;</p> <p>(b) the carriage service provider is satisfied that the end-user subsequently made a successful emergency call; or</p> <p>(c) the end-user made the unsuccessful emergency call using a public mobile telecommunications service, and the location of the customer equipment from which the call was made has changed since the call was made.</p>	Compliant

Appendix A: Optus's definition of a Significant Network Outage (SNO) and Welfare Check

EY did not assess the appropriateness of Optus' SNO criteria.

Definitions as per Section 6 of the Telecommunications (Emergency Call Service) Determination 2019

Per section 6 of the Telecommunications (Emergency Call Service) Determination 2019, a **SNO** means an unscheduled network failure that adversely affects the carriage of emergency calls over that network in a significant way, having regard to:

- a) the number of customers impacted by the outage;
- b) the likely amount of time it will take to restore carriage services disrupted by the outage; and
- c) the availability of other carriage services that can be used by affected customers to make and receive calls.

and a **welfare check** means the process of checking on the safety and well-being of an end-user including, at a minimum:

- a) if the end-user made an unsuccessful emergency call using an emergency telephone service:
 - (i) attempting to contact the end-user by phone; and
 - (ii) if the phone call is unsuccessful, referring the matter to the police force or service in the State or Territory in which the end-user is located; or
- b) if the end-user made an unsuccessful emergency call using a public mobile telecommunications service:
 - (i) sending an SMS (first SMS) to the end-user requesting that the end-user respond in the manner prescribed in the message;
 - (ii) if no response is received to the first SMS within a reasonable time after the message is sent, sending another SMS (second SMS) containing the same information as the first SMS; and
 - (iii) if no response is received to the second SMS within a reasonable time after the message is sent, referring the matter to a police force or service in the State or Territory in which the end-user is located.

Optus' Definitions

Optus's criteria for a SNO declaration are as follows:

- ▶ Any complete mobile site outage impacting more than 50 mobile sites and lasting longer than 1 hour.
- ▶ Any fixed incident (CVC / NBN outage for example) impacting more than 20,000 customers and lasting more than 1 hour.
- ▶ Any core switching incident where call impacts are observed to more than 20,000 calls above BAU, impacting 000 and lasting more than 1hr.

- ▶ Optus does not include the assessment of the availability of an alternative carriage service given that:
 - ▶ Optus cannot monitor the other carriers' networks to determine whether they are operating.
 - ▶ In areas where it is known that Optus is the only carrier, Optus would not be able to contact any affected callers during an outage of our network.

Furthermore, Optus' welfare check process considers guidance from Industry Guideline G644:2020 Emergency Call Service Protections Requirements Section 3.2 Significant Network Outages Management Process, and the definition of a 'welfare check' as per Section 6 of the Telecommunications (Emergency Call Service) Determination 2019. Refer to Major Process Welfare Check in Appendix C below for more details of Optus' welfare check process.

Appendix B: The Telecommunications (Emergency Call Service) Determination 2019 Mapped to Optus' Control Environment

The following table maps Optus' key controls to the corresponding section in the Determination to assess control coverage over the welfare check requirements.

Section Reference #	Sections from the Telecommunications (Emergency Call Service) Determination 2019	Control reference
28	Section 28: Welfare checks - significant network outages	
	(1) A carriage service provider must, as soon as practicable after:	
	(a) becoming aware of a significant network outage that adversely affects a controlled network or controlled facility that the provider owns or operates; or	C.01
	(b) being notified of a significant network outage under paragraph 27(2)(b),	C.02
	undertake, or arrange to be undertaken, a welfare check on an end-user who made an unsuccessful emergency call during the outage using an emergency telephone service supplied by the carriage service provider.	C.03
		C.04
		C.05
		C.06
		C.07
	(2) Subsection (1) does not apply where:	C.08
	(a) the carriage service provider cannot identify that the end-user has made the unsuccessful emergency call;	C.09
	(b) the carriage service provider is satisfied that the end-user subsequently made a successful emergency call; or	C.10
	(c) the end-user made the unsuccessful emergency call using a public mobile telecommunications service, and the location of the customer equipment from which the call was made has changed since the call was made.	C.11
		C.12
		C.13
		C.14

Appendix C: Background, Summary of Test Procedures, and Results of Test

Background:

Optus has identified two teams, the Network Team, and the Frontline Team, as responsible for performing welfare checks during SNOs:

- **Network Team Responsibilities:** The Network team is responsible for managing the infrastructure necessary for emergency communications. This includes promptly addressing SNOs and ensuring complete and accurate extraction of CDRs from network switches. The team follows detailed instructions to manage and report incidents affecting emergency call services. They are responsible for the timely notification of such incidents to senior management, external parties, and the coordination of resolution efforts, which involves detailed scenario checklists and triage processes for different types of network disruptions.
- **Frontline Team Responsibilities:** The Frontline team is directly responsible for executing welfare checks during SNOs. Their duties include initiating contact with affected customers to assess whether they need emergency call service, and any necessary escalation to the state police. They use standardised communication protocols to conduct these checks via phone or SMS. The team also maintains detailed records of all interactions and outcomes of these welfare checks to ensure accountability and traceability.

Description of Controls, Test Procedures and Results of Test:

In the following table, test procedures were assessed against Optus' key controls, and the results of the test that address each risk was developed.

It should be noted that the Determination does not specify particular controls that an entity is required to design, implement, and operate in order to satisfy the Determination. Optus management have developed a Criteria outlined in Appendix A and Appendix B to assess compliance with the Determination requirements. Therefore, we have implemented a risk-based approach, focusing on testing of key controls that are crucial for ensuring adherence to the Determination.

Determination Section	Determination Sections S 28 (1)(a), S 28 (1)(b)			
Major Process	Policy, Governance and Oversight			
Control Reference	Criteria Section Reference #	Control Description	Testing procedures performed by EY	Testing results
C.01	S 28 (1)(a) S 28 (1)(b)	Monitoring of Regulatory Changes All changes to regulatory obligations are monitored by the Regulatory Team. Any changes that have an impact to Optus are assessed and communicated to relevant Optus stakeholders and the Compliance Team in a timely manner. Further, when a regulatory change occurs, the Compliance Team are responsible for confirming that controls related to regulatory obligations are assessed and updated as required.	Inquired with (Regulatory Associate Director) and (Senior Director, Compliance) to determine whether a process exists to ensure changes to the Criteria are monitored, communicated to relevant Optus stakeholders, and updated as required. Note: This test was based on inquiry only, as there have been no recent changes to the Criteria.	No deviations noted.
C.02	S 28 (1)(a) S 28 (1)(b)	SOP: Network & Frontline A Standard Operating Procedure (SOP) detailing welfare check procedures exists for the Network and Frontline team. This SOP clearly defines roles and responsibilities, incident management and triage, definitions (e.g., 'significant network outage'), the timeliness of critical tasks, scenario checklist, data extraction, standardised procedures, and escalation protocols.	Inspected Network and Frontline SOPs to determine whether the SOPs clearly define roles and responsibilities, incident management and triage, definitions (e.g., 'significant network outage'), the timeliness of critical tasks, scenario checklist, data extraction, standardised procedures, and escalation protocols.	No deviations noted.

C.12	S 28 (1)(a) S 28 (1)(b)	<p>Monitoring of Frontline welfare checks</p> <p>All mandatory welfare checks are recorded, updated, and monitored until completion. The Global Contact Centres Duty Director is responsible for finalising the customer contact list to ensure the completeness and accuracy of the welfare checks conducted. Furthermore, the Duty Director is responsible for sending an email to the Welfare Check Response Group confirming that welfare checks have been completed. The excel file with the completed welfare check outcomes is retained in TEAMS site and password protected.</p>	<p>Inspected email evidence sent by the Duty Director to the Welfare Check Response Group to determine whether mandatory welfare checks have been completed.</p> <p>Inspected the excel file of welfare check outcomes to determine whether all mandatory welfare checks are recorded, updated, and monitored until completion.</p> <p>Note: Due to the inherent nature of the incidents (i.e., limited occurrence of an actual 'SNO' event and limited data availability), our test procedures were conducted through a simulated, scenario-based assessment using the updated, documented Standard Operating Procedures for conducting welfare checks in a SNO.</p>	No deviations noted.
C.14	S 28 (1)(a) S 28 (1)(b)	<p>Welfare Check Training</p> <p>All relevant Network and Frontline personnel identified in the end-to-end welfare check review process are provided with formal, ongoing training on welfare check regulatory requirements and any changes to the standard operating procedures. Optus is responsible for identifying a complete and accurate list of personnel, facilitating training sessions timely and monitoring training completion rates.</p>	<p>Inspected attendance training records of welfare check training sessions conducted for the Network and Frontline teams to determine whether training is conducted periodically for the appropriate personnel and whether training completion is monitored.</p>	Deviation noted, refer to ' Appendix D ' for further detail.

Determination Section	Determination Sections S 28 (1)(a), S 28 (1)(b)			
Major Process	Data Completeness			
Control Reference	Criteria Section Reference #	Control Description	Testing procedures performed by EY	Testing results
C.03	S 28 (1)(a) S 28 (1)(b)	<p>Data Input: Switches to DCS (Optus' data store)</p> <p>DCS is configured to poll network switches on a periodic basis to receive Call Detail Records (CDRs) which contain emergency call data. DCS receives and stores CDRs files in a complete and accurate manner.</p>	<p>Inspected a sampled hour of input data polled from network switches and stored in the DCS, as well as output data transferred from DCS to TARO for in-scope CDRs.</p> <p>Performed a VLOOKUP using a unique transaction ID in the input listing to the output listing, to determine whether data completeness and accuracy from network switches (the source of truth) to TARO (Optus' regulatory system) was achieved.</p>	No deviations noted.
C.04	S 28 (1)(a) S 28 (1)(b)	<p>Data output: DCS to TARO</p> <p>Batch jobs exists to transfer CDRs files from the DCS Data Store into Optus' regulatory system, TARO. TARO receives CDRs files on a periodic basis in a complete and accurate manner.</p>	<p>Note 1: EY defined the in-scope emergency call data records (CDRs) as follows:</p> <p>1. The audit tested data completeness from switches to the downstream systems. It is understood that if the calls do not reach the switches, the customer's CDRs are not recorded. Under such instance, it is not the Entity's obligation to perform a welfare check.</p> <p>2. The audit included '000' (Triple Zero), '112' and '106' as the emergency service</p>	No deviations noted.

			<p>numbers in scope for our assessments of the Subject Matter.</p> <p>3. The audit considered all Call Data Records (CDR) types (three in total) polled from network switches relating to in-scope emergency service numbers:</p> <ul style="list-style-type: none"> ▶ MSC - for 3G voice calls ▶ VoLTE/VoNBN - for 4G voice calls ▶ DMS/CS2K/C20 - for enterprise voice calls <p>Note 2: Optus does not offer voice services over native 5G networks as of 30 April 2024.</p> <p>Note 3: Due to the inherent nature of the incidents (i.e., limited occurrence of an actual 'SNO' event and limited data availability), our test procedures were conducted through a simulated, scenario-based assessment using the updated, documented Standard Operating Procedures for conducting welfare checks in a SNO.</p>	
C.06	S 28 (1)(a) S 28 (1)(b)	<p>GDC extracting the TARO Extract</p> <p>Nokia GDC is responsible for initiating a manual trigger in TARO to extract Triple Zero, 112 and 106 data from DCS. The parameters used by Nokia GDC ensure data completeness and accuracy.</p>	<p>Inspected Nokia GDC inputting TARO queries and extracting TARO data to determine whether the query of the TARO extract is appropriate to cover the time period of the significant network outage for Triple Zero, 112 and 106 calls.</p> <p>Observed the Nokia GDC confirming the number of rows in each file (Triple Zero, 112 and 106) to determine whether data</p>	No deviations noted.

			<p>completeness and accuracy was achieved during file transfer.</p> <p>Note: Due to the inherent nature of the incidents (i.e., limited occurrence of an actual 'SNO' event and limited data availability), our test procedures were conducted through a simulated, scenario-based assessment using the updated, documented Standard Operating Procedures for conducting welfare checks in a SNO.</p>	
C.07	S 28 (1)(a) S 28 (1)(b)	<p>TARO Completeness: Duty Director's Review</p> <p>The TARO extracts containing failed Triple Zero, 112 and 106 calls are reviewed by Optus' Duty Director to ensure completeness and accuracy of the data. Duty Director checks:</p> <ul style="list-style-type: none"> - The timeframe (e.g., 4 or 8 hours depending on the file) - The coverage of answered and unanswered calls - The screenshot of the query - The timestamp of the switch status. 	<p>Observed the Duty Director verify the appropriateness of the TARO query parameters and the completeness of the extract output, including the timeframe of the SNO, the coverage of answered and unanswered calls, the screenshot of the query, and the timestamp of the switch status; to determine whether data completeness and accuracy was achieved for the TARO extracts.</p> <p>Note: Due to the inherent nature of the incidents (i.e., limited occurrence of an actual 'SNO' event and limited data availability), our test procedures were conducted through a simulated, scenario-based assessment using the updated, documented Standard Operating Procedures for conducting welfare checks in a SNO.</p>	No deviations noted.
C.08	S 28 (1)(a) S 28 (1)(b)	<p>TARO Completeness: 4-Hour Data Reconciliation</p>	<p>Inspected the first '4hrly Comparison Workbook' for the initial welfare check and the second '4hrly Comparison Workbook'</p>	No deviations noted.

		<p>The Duty Director is responsible for performing a 4-hourly data reconciliation of the TARO extracts to ensure completeness and accuracy of failed emergency call data extracts used to perform welfare checks.</p> <p>The Duty Director ensures that:</p> <ul style="list-style-type: none"> - the reconciliation occurs a 4-hour interval from the start of the incident until incident resolution - the initial TARO extract covers the first 4-hours of the incident - all subsequent extracts are run at 4-hour intervals covers the previous 8-hour period - a final reconciliation is performed 4-hours post resolution covering the last 4-hours of the incident. <p>Evidence and results from the reconciliation are recorded and maintained in an Excel workbook, and welfare checks are performed for any variances identified by the Frontline team.</p>	<p>for the second welfare check to determine whether the data reconciliation performed by the Duty Director was appropriately recorded in the workbook.</p> <p>Inspected through the TARO queries that the initial TARO extract covered the first 4-hours of the incident, and the subsequent extract covered the previous 8-hour period for data reconciliation.</p> <p>Note: Due to the inherent nature of the incidents (i.e., limited occurrence of an actual 'SNO' event and limited data availability), our test procedures were conducted through a simulated, scenario-based assessment using the updated, documented Standard Operating Procedures for conducting welfare checks in a SNO.</p>	
C.09	S 28 (1)(a) S 28 (1)(b)	<p>Frontline Welfare Check Initiation</p> <p>The Global Contact Centres Duty Directors sends an email to the responsible frontline team (e.g., Customer Resolution or social media Team) with the Customer Contact List and work instructions to perform the welfare check.</p>	<p>Inspected a sample email from the Global Contact Centres Duty Directors confirming the responsible team assigned for the welfare check (e.g., Customer Resolution or Social Media team), the Customer Contact List, and the work instructions.</p>	No deviations noted.

Determination Section	Determination Sections S 28 (1)(a), S 28 (1)(b)			
Major Process	Welfare Check			
Control Reference	Criteria Section Reference #	Control Description	Testing procedures performed by EY	Testing results
C.10	S 28 (1)(a) S 28 (1)(b)	<p>Welfare check: Mobile</p> <p>A welfare check is performed for end users who made an unsuccessful emergency call using a mobile telecommunications service. A first SMS is sent to the end-user to respond with a yes/no. If no response is received to the first SMS within 10 minutes, a second SMS with the same information as the first SMS is sent. If no response is received to the second SMS within 10 minutes, the matter is extended to a police force or service in the State or Territory in which the end-user is located.</p>	<p>Inspected one (1) welfare check sample performed for a mobile service number, for each of the below:</p> <ul style="list-style-type: none"> a) 'Yes' as customer's response requiring assistance in the first SMS b) 'No' as customer's response requiring assistance in the first SMS c) 'Yes' as customer's response requiring assistance in the second SMS d) 'No' as customer's response requiring assistance in the second SMS e) No reply in both the first and second SMS <p>to determine whether the welfare check is conducted within the appropriate timeframe (e.g., 10 minutes) for each of the scenarios. Validated that any uncontactable end-users were referred to the police/state authorities.</p> <p>Note: Due to the inherent nature of the incidents (i.e., limited occurrence of an actual 'SNO' event and limited data availability), our test procedures were conducted through a simulated,</p>	No deviations noted.

			scenario-based assessment using the updated, documented Standard Operating Procedures for conducting welfare checks in a SNO.	
C.11	S 28 (1)(a) S 28 (1)(b)	<p>Welfare check: Fixed Line</p> <p>A welfare check is performed for end-users who made an unsuccessful emergency call using an emergency telephone service for a total of two (2) attempts every 10 minutes. If the phone call is unanswered, the matter is referred to the police force or service in the State or Territory in which the end-user is located.</p>	<p>Inspected screenshot of outbound call logs with the applicable timestamp, for each of the following:</p> <ul style="list-style-type: none"> a) Answered call in the first attempt b) Answered call in the second attempt c) Unanswered call in both first and second attempt <p>to determine whether the welfare check is conducted within the appropriate timeframe (e.g., 10 minutes) for each of the scenarios. Validated that any uncontactable end-users were referred to the police/ state authorities.</p> <p>Note: Due to the inherent nature of the incidents (i.e., limited occurrence of an actual 'SNO' event and limited data availability), our test procedures were conducted through a simulated, scenario-based assessment using the updated, documented Standard Operating Procedures for conducting welfare checks in a SNO.</p>	No deviations noted.

Determination Section	Determination Sections S 28 (1)(a), S 28 (1)(b)			
Major Process	Incident Management			
Control Reference	Criteria Section Reference #	Control Description	Testing procedures performed by EY	Testing results
C.05	S 28 (1)(a) S 28 (1)(b)	Batch Job Monitoring/Incident Management Switches and DCS are configured to automatically alert the Production Support Team upon a batch job failure. All failures are recorded, monitored, and resolved in accordance with SLAs.	Inspected configuration evidence of emergency call batch jobs to determine whether it is configured to automatically send an alert to the Support Team for resolution upon a batch job failure. Inspected a sample of one (1) batch job error and determined that an error notification is sent to the Support Team automatically upon failure, and is recorded, monitored and resolved until resolution.	No deviations noted.
C.13	S 28 (1)(a) S 28 (1)(b)	Incident notification process / triage The Network team is responsible for notifying the relevant internal and external stakeholders (e.g., ACMA, Concentrix, Telstra) when a significant network outage is identified and declared.	Inspected the Network SOP to determine whether the incident notification process/ triage is outlined in the SOP. Inspected a sample SNO notification email sent to the relevant internal stakeholders to determine whether the email contained the incident summary, number of customers impacted, estimated time of restoration, and the contact person. Note 1: Due to the inherent nature of the incidents (i.e., limited occurrence of an actual 'SNO' event and limited data availability), our test procedures were	No deviations noted.

			<p>conducted through a simulated, scenario-based assessment using the updated, documented Standard Operating Procedures for conducting welfare checks in a SNO.</p> <p>Note 2: The audit excluded test procedures that involved engagement with external parties (i.e., ACMA, Concentrix, Telstra) for the purpose of our scenario-based assessment.</p>	
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Appendix D: Control Deviations

#	Control ID #	Control Description	Control Deviation Details	Issue type
1	C.14	All relevant Network and Frontline personnel identified in the end-to-end welfare check review process are provided with formal, ongoing training on welfare check regulatory requirements and any changes to the standard operating procedures. Optus is responsible for identifying a complete and accurate list of personnel, facilitating training sessions timely and monitoring training completion rates.	<p><u>Lack of Formal Training Plan and Monitoring</u></p> <p>Welfare check training sessions are provided on an ad-hoc basis for relevant Network and Frontline personnel. However, as the welfare check process is routinely updated for improvements, there is a lack of a formal training plan to consistently equip staff on an ongoing basis. Additionally, there is inadequate monitoring to ensure training completion and consistent welfare check outcomes.</p>	Design

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