



12 September 2018

**James Hetherington**

Chair, National Oil Supplies Emergency Committee  
Emergency Management and Preparedness Section  
Department of the Environment and Energy  
GPO Box 787  
Canberra ACT 2601

Dear James,

**RE: Review of the Guidelines and Essential Users Determination under the *Liquid Fuel Emergency Act 1984*.**

Communications Alliance and the Australian Mobile Telecommunications Association thank the Department of the Environment and Energy for the opportunity to comment on the *Liquid Fuel Emergency Act* review.

The Telecommunications Industry is critical to the delivery of essential services in times of natural and manmade disasters. The community and those tasked with delivering support and aid to the community rely on this critical infrastructure to provide assistance in time of critical and life-threatening situations. Telecommunications infrastructure has become more complex and as such relies on liquid fuels for emergency power sources such as generators to deliver these critical services in emergency situations.

The Telecommunications Industry is a critical part of delivering the capability of a functional community. This can be seen by the introduction of such legislation as the *Telecommunications (Interception and Access) Amendment (Data Retention) Act 2015* (Data Retention), the *Telecommunications and Other Legislation Amendment Act 2017* (Telecommunications Sector Security reforms) and the recently proposed *Assistance and Access Bill 2018* (Encryption Bill).

The communications sector consists of a very wide range of providers who own and/or manage infrastructure including, but not limited to; large and small exchanges, mobile base stations, satellite earth stations and data centres including international gateways that terminate submarine cables.

Without this broad range of communication services providers, the public would be unable to receive emergency alerts or make emergency calls. Communications are also vital to the operation of emergency services and the businesses that supply essential financial, food, and transport services to the community. Without communications capability, the liquid fuel sector would cease to operate.

The Telecommunications Industry would highly recommend you consider including those entities that make up the communications supply chain on the list of essential user activities included in the Determination.

Yours sincerely,



John Stanton  
**Communications Alliance CEO**



Chris Althaus  
**AMTA CEO**