
Appendix one – Response from agency

Department of Customer Service
Office of the Secretary



Our reference: COR-01873-2023

Your reference: 02307737

Ms Margaret Crawford
Auditor General of New South Wales
NSW Audit Office

Dear Ms Crawford,

Thank you for your letter conveying the Performance Audit – “Management of the Critical Communications Enhancement Program (CCEP)” report.

The report accurately details that:

- (i) The NSW Telco Authority is delivering a radio network that meets the needs of Emergency Service Organisations (ESO's) and will exceed any radio coverage previously available to ESO's, and
- (ii) More work is needed to review governance mechanisms, expedite device authentication and address the policy gap for in-building coverage in new and existing buildings post program completion.

NSWTA accepts all recommendations and is pleased to confirm that work has commenced against each. Comments against each recommendation are provided below:

The NSW Telco Authority should (in consultation with the Emergency Service Organisations):

1. **by October 2023, finalise its PSN Traffic Mitigation Plan and determine a schedule and method by which that plan will be tested.**
The NSW Telco Authority in collaboration with ESOs have drafted the plan. Testing and finalisation of the plan is on track for completion October 2023.
2. **by December 2023, review whether current or planned governance arrangements for the enhanced PSN are adequate and appropriate for the evolving relationship between agencies, include to support ongoing collaboration and communication**
The NSW Telco Authority maintains strong relationships with customers through a range of forums, including the State Emergency Management Committee and with representation by Emergency Service Organisation on the NSW Telco Authority advisory board. A review of the current engagements will be undertaken, with a particular focus on operational forums. Specifically, the NSW Telco Authority will, in consultation with Emergency Service Organisations, review the terms of reference for the Operational Service Delivery Governance forum by December 2023.
3. **by January 2024, work with other relevant NSW government agencies to provide advice to the NSW Government on the options, benefits and costs of addressing the regulatory gap for in-building public safety communications coverage in new and existing buildings**
NSWTA is working with relevant NSW government agencies in developing and implementing Minimum Digital Connectivity Principles, which will promote the requirements for in building

McKell Building
2-24 Rawson Place, Sydney NSW 2000

Tel 02 9372 8877
TTY 1300 301 181

ABN 81 913 830 179
nsw.gov.au

coverage in new and significantly refurbished major infrastructure being funded by the NSW government. The principles are planned to be implemented as part of a first phase by January 2024 via an NSW Government Administrative Requirement.

4. **by March 2024, consider what, if any, technical and governance arrangements are required for circumstances where operational communications requires both encryption and interoperability**

Interoperability is currently delivered through the allocation of unencrypted shared talk groups (which allow ESO's to communicate with each other), and General Liason channels (which allow all PSN users to communicate with each other). Interstate interoperability is also delivered today through connection of two network cores, eg: QLD and NSW networks. The 'Radio Authentication and Encryption project' being led by the NSW Telco Authority is looking to overcome the encryption and interoperability challenge. This program will determine the technical and governance arrangements required for improved network encryption and identify those use cases that require both encryption and interoperability.

The NSW Telco Authority should:

5. **ensure that it complies with its Infrastructure Capacity Reservation Policy**

Through the delivery of the CCEP, NSWTA will address the infrastructure capacity reservation policy. This includes improved capture of information relating to reservations.

6. **expedite the mitigation of the risk of cloning of unauthenticated terminals:**

a. **by October 2023, implement interim strategies to identify and address the risk of cloned terminals**

This risk is known to ESOs and currently mitigated through operational process. The NSW Telco Authority has commenced work to address issues relating to cloned terminals and will have a plan in place from October 2023.

b. **by June 2024, require that authentication-capable terminals be authenticated**

In progress as part of the current 'Radio Authentication and Encryption project.'

c. **by June 2025, require all terminals using the enhanced PSN be authenticated.**

In progress as part of the current 'Radio Authentication and Encryption project.'

I would like to thank your staff for their time and professionalism during the audit.

Sincerely,



Emma Hogan
Secretary

McKell Building
2-24 Rawson Place, Sydney NSW 2000

Tel 02 9372 8877
TTY 1300 301 181

ABN 81 913 830 179
nsw.gov.au