



Extending rules about requests for USO voice services

Submission to the Department of Infrastructure,
Transport, Regional Development, Communications,
Sport and the Arts

20 May 2026

Recommendations

This submission recommends that the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts:

1. Make the *Telecommunications Universal Service Obligation (Standard Telephone Service – Requirements and Circumstances) Amendment Determination 2026* and the proposal to extend its current end date.
2. Align the *Telecommunications Universal Service Obligation (Standard Telephone Service – Requirements and Circumstances) Amendment Determination 2026* repeal date with the *Telecommunications (Customer Service Guarantee) Standard 2023*.
3. Develop a clear transition roadmap and robust governance framework to transition the primary universal service provider from Telstra to NBN Co.
4. Provide comprehensive guidance in the Explanatory Statement regarding the circumstances and processes for technology withdrawal, replacement, or cessation, to ensure transparency and reduce potential consumer disputes.
5. Ensure that, during technology migrations, existing consumer entitlements, such as priority assistance and customer service guarantee timeframes, are preserved without placing additional burdens on affected customers.
6. Introduce safeguards so that the indicative reasonable timeframe for arranging electricity supply genuinely reflects consumers' circumstances and pause customer service guarantee timeframes while consumers resolve electricity supply issues to prevent penalisation for delays beyond their control.

About this submission

ACCAN is pleased to provide this submission to the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts on extending rules about requests for Universal Service Obligation voice services.

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ACCAN is the peak national consumer organisation advocating trusted, accessible, inclusive, affordable and available communications and digital services.

1. Introduction

ACCAN welcomes the opportunity to comment on the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (**the Department**) on the draft *Telecommunications Universal Service Obligation (Standard Telephone Service – Requirements and Circumstances) Amendment Determination 2026 (draft Determination)*, which extends the operation and makes some minor adjustments to the *Telecommunications Universal Service Obligation (Standard Telephone Service – Requirements and Circumstances) Determination 2023 (2023 Determination)*.

ACCAN supports the draft Determination, which provides additional consumer safeguards to ensure Universal Service Obligation (**USO**) Standard Telephone Services (**STS**) are reasonably accessible to all Australians on an equitable basis. The draft Determination provides essential and ongoing certainty, clarity, guidance, and protection for consumers, the Australian Communications and Media Authority (**ACMA**), and the Telecommunications Industry Ombudsman (**TIO**) on the provision of USO STS.¹

2. Extension of the 2023 Determination

ACCAN supports extending the 2023 Determination through the draft Determination. ACCAN has previously supported the Department's extension of the CSG Standard for three years, until 31 August 2029.² We support the alignment of the draft Determination repeal date to that of the *Telecommunications (Customer Service Guarantee) Standard 2023 (CSG Standard)*.

2.1. USO transition roadmap and governance framework

While the draft Determination does not directly address broader USO governance, ACCAN believes it is essential to highlight this issue. Currently, Telstra remains the primary universal service provider under the USO framework, while NBN Co is increasingly responsible for the underlying wholesale network infrastructure. This dual arrangement creates structural tensions and inconsistencies, highlighted by the 2023 Determination. For example, subsection 7(5) of the 2023 Determination highlights that Telstra has no obligation to supply an STS when NBN Co fixed line network failures affect Telstra's ability to provision a USO STS. As NBN Co's role as Australia's wholesale provider expands, these issues are likely to intensify.

We call for the USO to transition over time from Telstra to NBN Co. As part of this process, we also recommend that the Department develop a clear transition roadmap outlining how USO service delivery responsibilities will shift from Telstra to NBN Co. This roadmap should also establish robust

¹ Minister for Communications, *Telecommunications Universal Service Obligation (Standard Telephone Service – Requirements and Circumstances) Amendment Determination 2026* (Draft Explanatory Statement, 2026) 1.

² ACCAN, *Extending the Customer Service Guarantee instruments* (Submission, Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts, March 2026).

governance arrangements to ensure that NBN Co is held to appropriate standards of accountability and transparency.

3. Expanded definition of ‘request’

ACCAN strongly supports the expanded definition of ‘request’ in subsection 4(1) (definition of *request*). The addition of paragraph (b) represents a significant improvement in consumer protections for the provision of USO STS. It will ensure that when a primary universal service provider withdraws, replaces, or ceases to supply a technology used to provide an STS, and the consumer must obtain STS via an alternative technology, a request is deemed to have been made.

This amendment mitigates the risk that consumers affected by provider-initiated technology migrations are treated as if making entirely new service requests, possibly losing existing entitlements or experiencing delays. Deeming a request in these situations ensures the primary universal service provider’s USO obligations continue seamlessly during technology migrations.

However, ACCAN requests clearer guidance in the Explanatory Statement on the circumstances under which the primary universal service provider can withdraw, replace, or cease supplying a technology. ACCAN is concerned that, without clear guidance, these terms may be open to an overly narrow interpretation, leading the primary universal service provider to classify a technology migration as an ‘upgrade’. Clearer guidance would help mitigate disputes and increase certainty for consumers, the ACMA, and the TIO.

In addition, where a request arises under Subsection 4(1)(b), any existing service entitlements should carry over, including priority assistance status, existing CSG timeframes, and other applicable consumer protections. The internal decisions of the primary universal service provider should not disadvantage consumers who have involuntarily migrated to an alternative technology.

4. Requirement to provide advice on electricity supply

ACCAN supports the amendment at Paragraph 7(4)(a) of the draft Determination, which requires the primary universal service provider to clearly outline, through written notice, the steps needed to obtain a suitable electricity supply, relevant technical requirements (including those requiring a licensed electrician), and an indicative reasonable timeframe, before refusing to supply an STS due to inadequate electricity supply.

This represents a significant improvement over the current provision at paragraph 7(4)(a) of the 2023 Determination, which allows the primary universal service provider to refuse service for inadequate electricity supply without an obligation to explain what is required. Consumers, especially in regional, rural, and remote areas, may not understand the technical specifications needed to power telecommunications services.

ACCAN further recommends that the Department include a safeguard to ensure the indicative reasonable timeframe genuinely reflects the consumer’s circumstances, including their location, access to a licensed electrician, and the complexity of the work required. Additionally, any relevant

CSG timeframes should be paused while the consumer is arranging the electricity supply, so that diligent consumers are not penalised by the expiration of CSG timeframes beyond their control.

5. Updates to CSG Standard references

ACCAN supports the amendments to the relevant sections of the draft Determination that note that the *Telecommunications (Customer Service Guarantee) Standard 2011* is no longer in force and update references to relevant provisions in the *Telecommunications (Customer Service Guarantee) Standard 2023*, as in force from time to time.

6. Conclusion

ACCAN supports the Department's efforts to extend and update the obligations contained in the draft Determination. The amendments proposed to the 2023 Determination are a positive step to ensure that all Australians continue to have equitable access to essential communications services, with appropriate safeguards and protections in place.

We thank the Department for the opportunity to comment on the draft Determination. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact [REDACTED]

The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers. ACCAN is committed to reconciliation that acknowledges Australia's past and values the unique culture and heritage of Aboriginal and Torres Strait Islander peoples.



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