
Dear Sir/Madam,

I am writing to express my concerns regarding the proposed amendments to the Telecommunications Universal Service Obligation (Standard Telephone Service – Requirements and Circumstances) Determination.

I live in CW Queensland approximately 90km from the nearest town.

My household/business currently relies on: 100% a satellite service via Starlink for internet as we have no mobile service at all in our area. Power at my property is: via the SWER system with frequent planned and unplanned outages.

Mobile coverage at my property is: we have no coverage at all in our area or in any location SW of Blackall. Our closest towers are 90 and 120km away to our east and west. We rely completely on our existing landline service as a back up service for when the satellite is not functioning or when we have planned and unplanned outages. I would also like to point out that the Starlink service in relation to internet connectivity is not as reliable as when we first signed up to the provider a number of years ago.

For people in my situation, telecommunications are not optional. They are essential for safety, emergency response, business, health, family contact and staying connected.

I am particularly concerned about the proposed changes that would allow a standard telephone service to be refused where a consumer cannot provide or maintain “adequate power” for the replacement technology. In rural and remote Australia, reliable power cannot be assumed. Power outages, storms, generator issues and limited access to technical support are common realities. Installing or upgrading batteries, generators, solar systems or backup power can cost thousands of dollars and may not be achievable for many households. Under these changes, consumers could lose access to essential voice services simply because they cannot afford, maintain or manage the power requirements of newer technologies.

This represents a major shift from the traditional Universal Service Obligation, where services such as copper and CAN Radio/HCRC continued to operate during outages because they were powered through the network.

I am deeply concerned that rural and remote consumers are being expected to absorb the cost, complexity and risk of telecommunications technology transitions without equivalent safeguards or protections being put in place. I am also concerned that these changes raise significant equity and human rights concerns for rural, remote and vulnerable Australians, particularly where access to essential communications and emergency services may depend on a consumer's ability to fund and maintain additional equipment.

In my circumstances, the loss of reliable communications would mean:

The inability to contact Triple Zero, isolation during outages, inability to run business operations, safety

concerns, and medical concerns.

I am also concerned about:

Technology migrations, weather impacts on satellite services, no mobile coverage, affordability, emergency communications, misinformation during migrations and poor support experiences.

I am concerned that these amendments are being progressed while legacy services such as CAN Radio / HCRC are already being withdrawn by Telstra and consumers are being migrated onto technologies with very different operating characteristics and reliability profiles.

More broadly, these amendments appear to extend and adjust outdated frameworks without broader reform of the Universal Service Obligation or adequate protections to ensure consumers are not left worse off following migration.

I respectfully ask that the Government reconsider these amendments and undertake further consultation with affected rural and remote consumers before progressing these changes. At a minimum, the provisions allowing refusal of service based on power supply should not proceed unless effective safeguards, management plans for vulnerable cohorts and consumer protections are in place.

The Universal Service Obligation exists to ensure all Australians can access essential telephone services regardless of where they live. These changes risk undermining that principle for the very people the USO was designed to protect.

Yours sincerely,

Bruce Alexander
Blackall, CQ Qld