

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 approximately 5 km from the small town of Goomeri, 4601 in Queensland.

My household (with two children in high school) and our farming business currently relies on copper landline and NBN satellite services. Mobile coverage at our house is unusable with limited outdoor coverage available on some of our hilltops. We use mobile phones when we are away from our house for both personal and business reasons, although we are often in areas which poor or no phone coverage which impacts on the safety of workers in our farming business.

Power at my property is mains power supplied by Ergon Energy, however, most summers we have lightning strikes near the power network which leads to outages. As a powerline runs through our property supplying us, as well as other Ergon customers with power – we are in a position where we are often able to see and report faults (e.g. when lightening arrestors have been triggered) to Ergon which improves the speed of repair and the return of power to us and others.

For people in my situation, telecommunications are not optional. They are essential for safety, emergency response, business, health, high-school education (my children attend school, however, are required to do significant amounts of homework and assessments online and using an active connection), family contact and staying connected. We also support elderly family members during times of need and crisis.

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. I feel like we are spending more money than ever before on telecommunications and receiving services less reliable and adequate to meet our needs than ever before.

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. This is especially relevant in our situation where we rely on a copperline that does not require power – to report power outages and provide Ergon Energy (our power supplier) with information which improves their ability to respond timely and efficiently to issues with the powerline which runs through our property. These outages are often during the night, as they are often storm related and given we have no mobile coverage would require driving off property to receive mobile phone service to make the call if we did not have the copperline.

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. We want reliable 24/7 telecommunications which is available when need – including during power outages and especially in times of emergency.

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 safety concerns, difficulty in carrying out our farming business when power is out, difficulty in maintaining communications with family – especially elderly family members who live elsewhere yet rely on us to support them during difficulties and times of crisis.

I am also concerned about weather impacts on satellite services, no mobile coverage across much of our farming workplace, affordability, emergency communications, misinformation during migrations, poor support experiences.

I am concerned that these amendments are being progressed while legacy services including our copper landline are currently being refused by Telstra to maintained despite the current Universal Service Obligation – with no explanation to us as a customer as to what the actual problem with the copper line is.

I am also concerned that there was a loss of service in the area when 3G was shutdown and there seems to be no interest in increasing mobile phone coverage provided by land-based towers in the area at all – this includes the lack of addressing nearby blackspots.

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 also want to stress the importance of accountability around the provision of accurate and clear information from telecommunications companies, as I have experienced repeated examples of being told incorrect information from Telstra and other companies with regards to our copper line phone connection. Telstra repeatedly told us we were not able to port the connection across from our service delivery provider, however, after support from Better Internet For Rural, Regional and Remote Australia (BIRRR) and the Regional Tech Hub with escalating our issue within Telstra we were able to achieve the result we were early told was not possible. Customers should not need to rely on non-government not-for profits (BIRRR and Regional Tech Hub) to keep these organisations accountable, adhering to the Universal Service Obligation or to assist in navigating a suitable result.

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,

