

Submission – Extending Rules About Requests for USO Voice Services

Regarding: Telecommunications Universal Service Obligation (Standard Telephone Service—Requirements and Circumstances) Amendment Determination 2026

To the Department of Infrastructure, Transport, Regional Development, Communications and the Arts.

I write to express grave concerns regarding the proposed extension and amendment of the Universal Service Obligation (USO) arrangements, particularly as they affect people living in rural, remote and very remote Australia.

The proposed approach appears to permit the replacement of highly resilient legacy voice services, including High Capacity Radio Concentrator (HCRC) systems, with satellite broadband-based alternatives such as Starlink. In practice, this risks leaving remote Australians with a telecommunications outcome that is materially less reliable, less resilient and less equitable than that currently enjoyed both by remote users and by urban Australians.

The Government has repeatedly stated that Australians transitioned from legacy networks will receive an equivalent or better service outcome. Based on real-world operational experience, I do not believe this standard is being met.

This consultation represents a defining moment for the future of telecommunications in remote Australia. The decisions made now will shape emergency communications, infrastructure resilience and equality of access for decades to come.

1. Loss of Independent Power Redundancy

The most serious issue is the loss of telecommunications independence from household power systems.

Many remote Australians live entirely off-grid and rely on privately owned hybrid solar and generator systems. These systems are essential but are not immune to failures, outages or weather-related interruptions. A further large number of remote Australian rely on SWER lines for power which are also prone to failures, outages and weather-related interruptions which may continue for days due to the challenges of repairing infrastructure in remote locations.

Existing HCRC services provide a critical layer of resilience because they continue operating independently of the customer's local power system, much like traditional landline services in urban Australia.

Even during failures of local power infrastructure, HCRC systems can continue operating and provide access to emergency communications.

This redundancy is critically important in remote Australia where:

- distances to assistance are substantial,
- road access can be cut during floods and fire
- severe storms and cyclones are common,
- and telecommunications are often the only connection to emergency services.

Under the proposed transition model, satellite-based services such as Starlink rely entirely on customer-side power systems remaining operational.

This fundamentally changes the reliability profile of emergency communications in remote Australia.

Urban Australians continue to benefit from highly resilient fixed communications infrastructure backed by large terrestrial networks, grid redundancy and extensive maintenance capability. Remote Australians, however, are increasingly being asked to accept:

- customer-powered communications systems,
- greater outage exposure,
- increased maintenance responsibility,
- and reduced emergency resilience.

This creates a lower practical communications standard based solely on geography.

2. Remote Australians Are Being Transitioned Onto Services That May Be Less Reliable in Critical Conditions

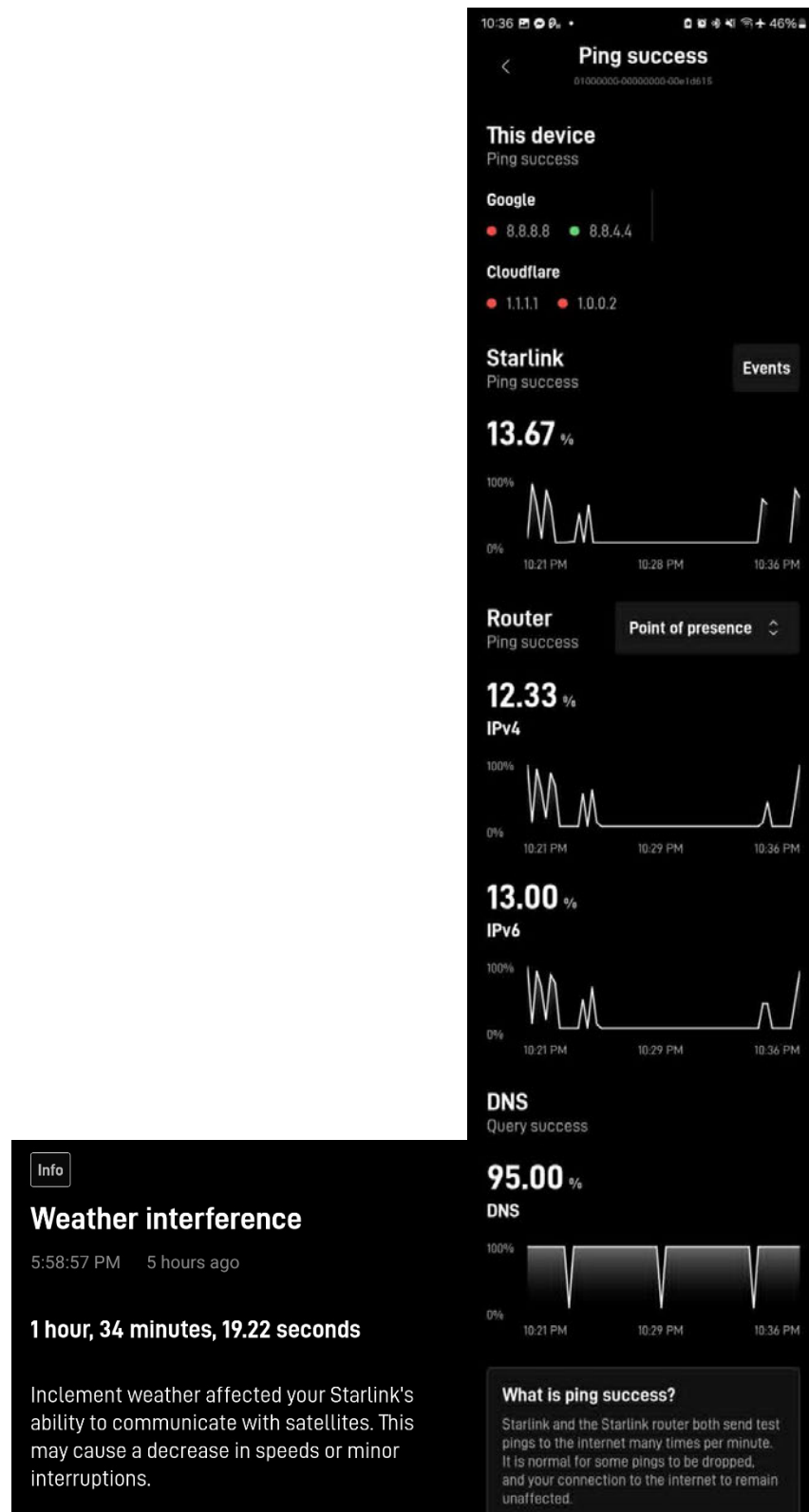
Many remote Australians already use both GEO and LEO satellite services as part of their communications systems.

Satellite technology has delivered substantial improvements in internet access across remote Australia and absolutely has an important role to play. However, these systems currently work best as part of a layered redundancy model alongside resilient terrestrial infrastructure.

In real-world remote operating environments, satellite services are not immune to failure.

I currently operate Starlink services myself and have collected operational data during wet season conditions. During severe weather events, I have repeatedly observed rain fade and service degradation.

Below are a couple of screen grabs that demonstrate the complete lack of reliability in the LEO service in normal wet season weather events.



In many of these same periods, HCRC voice services continued operating reliably.

This means:

- the existing network can remain functional during conditions where satellite systems fail,
- users are being transitioned away from proven resilient infrastructure,
- and replacement systems may perform worse during precisely the conditions where emergency communications matter most.

A service cannot reasonably be described as “equivalent or better” if:

- it is more vulnerable to severe weather,
- it depends entirely on customer-owned power systems,
- it introduces additional single points of failure,
- and it reduces redundancy during emergencies.

The USO exists because commercial telecommunications outcomes alone do not adequately protect Australians in remote regions. Replacing hardened independent voice infrastructure with consumer-powered satellite systems risks undermining the very purpose of the USO.

3. Australia Is Moving Away From Resilient Terrestrial Infrastructure Towards Greater Dependence on Foreign-Owned Satellite Networks

Another major concern is the broader strategic direction implied by the proposed amendments.

Australia already possesses significant terrestrial communications infrastructure throughout regional and remote areas. While parts of the HCRC network unquestionably require upgrading and modernisation, the solution should not be the abandonment of resilient terrestrial capability in favour of increasing dependence on foreign-owned Low Earth Orbit (LEO) satellite systems.

Many rural and remote consumers already use:

- terrestrial infrastructure,
- GEO satellite systems,
- mobile services where available,
- and newer LEO satellite services such as Starlink.

This layered approach creates stronger resilience because different technologies perform differently under different operating conditions.

The concern with the current proposal is that it risks removing one of the most resilient layers within that mix — namely independent terrestrial voice infrastructure — while increasing dependence on satellite-only delivery models.

Satellite systems should complement terrestrial infrastructure, not replace it entirely.

LEO satellite systems:

- remain vulnerable to severe weather and rain fade,
- rely on customer-side power systems,
- introduce additional points of failure,
- depend on imported hardware,
- and are controlled by foreign-owned private corporations.

By contrast, terrestrial infrastructure can provide:

- hardened long-term reliability,
- independent power arrangements,
- weather resilience,
- lower latency,
- and sovereign infrastructure capability.

Yes, upgrading remote terrestrial infrastructure is difficult and expensive. However, nation-building infrastructure in remote Australia has never been built based solely on short-term commercial efficiency.

The purpose of communications policy should be to strengthen the resilience, sovereignty and long-term capability of rural and remote Australia — not gradually reduce it.

4. Lack of Proper Trialling and Independent Oversight

I am deeply concerned that replacement satellite-based arrangements may be progressing without sufficiently rigorous real-world testing in remote environments.

Before resilient legacy services are withdrawn, replacement systems should undergo:

- independent field trials,
- wet season testing,
- cyclone-region testing,
- extended outage simulation,
- emergency reliability benchmarking,

- and side-by-side comparison against existing HCRC systems.

Remote Australia should not become a live trial for unproven communications arrangements.

I am also concerned that major decisions regarding remote telecommunications policy, USO standards and infrastructure transitions appear to be progressing without sufficient structured oversight from the consumers and industries most affected by those decisions.

Remote telecommunications policy should not be determined solely through internal government or carrier processes.

There should be a formal Remote Telecommunications Consumer and Industry Consultative Committee established to provide ongoing oversight and input into:

- USO reforms,
- telecommunications legislation and amendments,
- remote network transition programs,
- service reliability standards,
- and long-term infrastructure planning.

This body should include representation from:

- remote consumers,
- agricultural and pastoral industries,
- Indigenous communities,
- emergency services,
- remote telecommunications experts,
- and regional stakeholders with practical operational experience.

Remote Australians must have a genuine voice in decisions that directly affect their safety, connectivity and long-term future.

5. Proposed Amendments Risk Lowering the Practical Standard of the USO

The consultation paper notes that the amendments would include “minor changes to improve information provided to consumers, including about power requirements for services.”

This wording is particularly concerning because it appears to normalise the idea that future USO services may depend on customer-provided power systems.

Informing consumers that a service requires power is not the same as ensuring the service delivers the level of resilience historically expected under the USO.

The practical effect appears to be:

- shifting reliability responsibility from carriers onto consumers,
- reducing carrier infrastructure obligations,
- and normalising inferior resilience standards for remote users.

This risks fundamentally redefining the USO from a guaranteed communications outcome into a best-efforts consumer-managed arrangement.

6. Equity and Discrimination Concerns

Remote Australians already face:

- higher living costs,
- higher infrastructure costs,
- greater isolation,
- increased emergency vulnerability,
- and reduced access to services.

Communications policy should compensate for those disadvantages — not worsen them.

The current direction appears to accept that remote Australians may receive:

- less reliable voice services,
- greater outage exposure,
- increased maintenance burdens,
- inferior emergency resilience,
- and reduced redundancy protections.

If urban Australians would not reasonably accept communications systems that:

- fail when local power fails,
- degrade significantly during storms,
- and rely entirely on customer-maintained infrastructure,

then remote Australians should not be expected to accept those conditions either.

The USO was established specifically to ensure Australians were not disadvantaged based on geography. These amendments risk undermining that principle.

7. Emergency and Public Safety Concerns

In remote Australia, telecommunications are not simply a convenience.

They are often:

- the only link to emergency services,
- the only means of requesting medical evacuation,
- the only means of coordinating emergency response during floods, fires and cyclones,
- and the only communications pathway available during extended isolation events.

Communications failures in remote Australia can have life-threatening consequences.

For this reason, remote communications infrastructure should be subject to a higher resilience standard — not a lower one.

8. Requests

I respectfully request that the Government reconsider the current direction of these amendments and take immediate steps to protect the long-term communications resilience of rural and remote Australia.

Specifically, I request that the Government:

1. Retain HCRC and equivalent resilient independent voice systems until proven superior alternatives exist.
2. Require any replacement service to demonstrate equal or better reliability under real remote operating conditions before existing services are withdrawn.
3. Explicitly require backup power capability, independent resilience standards or carrier-supported redundancy for USO voice services in off-grid and remote areas.
4. Conduct independent multi-season field trials before approving satellite broadband-based services as replacements for critical USO voice infrastructure.
5. Establish minimum severe-weather, outage and emergency-performance standards that replacement systems must satisfy.
6. Recognise that satellite systems should complement terrestrial infrastructure as part of a layered redundancy model, not replace it entirely.
7. Commit to maintaining and upgrading resilient terrestrial communications infrastructure across regional and remote Australia.
8. Ensure Australia retains sovereign, resilient and weather-hardened communications capability throughout remote regions.

9. Establish an independent Remote Telecommunications Consumer and Industry Consultative Committee with representation from remote consumers, industry, Indigenous communities, emergency services and regional stakeholders.
10. Require meaningful consumer and industry consultation prior to major telecommunications policy changes, network shutdowns or legislative amendments affecting remote Australia.
11. Ensure future telecommunications reforms are assessed not only on commercial efficiency, but also on public safety, regional equity, national resilience and long-term strategic capability.
12. Pause any forced transition away from HCRC services until replacement systems are independently proven superior under real-world remote operating conditions.

The USO exists because Australians should not be disadvantaged based on geography.

Remote Australians contribute enormously to the national economy, regional communities and food security of this country. They should not receive a lower standard of communications reliability simply because they live beyond major population centres.

This is a public safety issue, a regional equity issue and a nation-building issue.

The decisions made now will shape the resilience and capability of remote Australia for decades to come. Strong leadership is required to ensure these reforms strengthen the future of rural and remote Australia rather than weaken it.

Thank you for the opportunity to provide this submission.

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Katherine, NT Pastoralist