

22 May 2026

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 and work at Gyranda Pastoral Company near Cracow in rural Central Queensland, approximately 45km from the nearest small town and around 500km northwest of Brisbane.

Our multi-household agricultural business relies on telecommunications for:

- business operations
- emergency communication
- staff and family safety
- education access for students
- online banking and administration
- health and community connection

Our current telecommunications services include Starlink, Telstra landline voice services delivered over satellite technology, limited mobile coverage and private mesh network systems.

Power supply at our property is mains power; however outages, brownouts and storm-related interruptions are common, particularly during summer months. We regularly experience power interruptions several times per month and often require backup generators to maintain communications.

Mobile coverage across our property is highly variable and in many locations non-existent. Prior to the 3G shutdown and migration process, several residences and transport routes had workable coverage through existing systems. Following transition to newer technologies, we have experienced a significant decline in both mobile and landline reliability.

For people in our situation, telecommunications are not optional. They are essential for safety, emergency response, education, business continuity and maintaining connection to services and community.

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 replacement technology.

In rural and remote Australia, reliable power cannot be assumed. Communications systems are increasingly dependent on multiple powered devices, modems, satellite equipment and internet connectivity. In our experience, this has shifted responsibility, cost and risk from the provider onto the consumer.

T +61 (0)7 4993 7144
E office@gyranda.com.au
M.S. 324 Theodore Qld 4719 AUSTRALIA

Gyranda Pastoral Co. ABN 77 028 566 052

GYRANDA.COM.AU



Previously, our landline services operated through a centralised solar and battery-backed system servicing multiple residences. Following migration away from legacy services, we were transitioned onto multiple individual Starlink and Telstra voice systems requiring separate powered equipment at each dwelling.

As a result:

- communications now fail during power outages
- maintaining a working phone often requires running portable generators and extension leads to communication equipment
- service reliability is affected by weather and power instability
- system complexity has increased substantially
- troubleshooting and maintenance burdens now sit largely with the consumer

This represents a clear deterioration in resilience and safety compared to previous systems.

Technology migration should not be considered successful where consumers are transitioned to services that are less reliable, less resilient or less usable than those previously available.

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 about the practical realities faced by rural users attempting to navigate increasingly complex telecommunications systems.

Throughout our transition process we experienced:

- conflicting technical advice from multiple provider staff
- repeated administrative failures
- loss of an established business phone number during migration
- poor escalation pathways
- repeated need to re-explain issues due to inadequate case management
- extensive time loss attempting to resolve faults

In one week alone, I lost the equivalent of three half days of productive business and volunteer work attempting to resolve a single telecommunications issue.

I strongly believe independent support services such as the Regional Tech Hub and BIRRR are becoming increasingly essential in regional Australia.

The Regional Tech Hub has provided:

- independent and trusted advice on suitable technologies and network configurations
- assistance diagnosing service issues including latency, speed and dropouts

- guidance on equipment options and system setup
- support escalating issues through appropriate complaint pathways
- practical assistance navigating an increasingly fragmented telecommunications environment

Without this support:

- decision-making would rely solely on provider advice, which was frequently inconsistent or incorrect
- resolution pathways would be unclear or inaccessible
- time and cost burdens on consumers would increase significantly
- users could become resigned to declining service standards, reduced support and increased isolation, with real implications for safety and participation in regional communities

Essential support for regional and remote Australia has already been pulled with the discontinuation of funding for the Regional Tech Hub.

I am concerned that these amendments are being progressed while legacy systems are already being withdrawn 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.

At a minimum, I believe:

- providers should be required to demonstrate equivalent or improved service outcomes before migration from legacy systems
- unreliable regional power supply should not become grounds to refuse essential voice services
- additional safeguards are required for outage-prone, off-grid and remote consumers
- greater accountability is needed during provider-initiated migrations
- independent advisory services such as the Regional Tech Hub should be retained and adequately funded

Reliable communications in rural and remote Australia are not a convenience. They underpin safety, emergency response, education, healthcare access, business continuity and social connection.

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

Yours sincerely,

