



NORTHERN TERRITORY CATTLEMEN'S ASSOCIATION INC.

Advancing and protecting the interests of cattle producers in the Northern Territory

Member - National Farmers' Federation

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

Universal Services Branch

Via email at: USB@infrastructure.gov.au

Re: Submission to the Consultation on Extending Rules About Requests for USO Voice Services

The Northern Territory Cattlemen's Association (NTCA) welcomes the opportunity to provide a submission on the Telecommunications Universal Service Obligation (Standard Telephone Service—Requirements and Circumstances) Amendment Determination 2026 (USO). The NTCA is the peak primary industry body in the Northern Territory, representing over 90% of the Territory's pastoral industry, from small family pastoral holdings and Indigenous enterprises to large corporate entities.

We advocate on behalf of land managers responsible for managing more than 45% of the Territory's land mass. The pastoral sector makes a critical contribution to the Northern Territory's regional economy, directly and indirectly employing over 10,000 people, supporting national and international food security, and promoting long-standing environmental stewardship across some of Australia's most remote landscapes.

NTCA's Position:

For remote Northern Australia, telecommunications are not a convenience. They are critical operational and safety infrastructure. The NTCA is deeply concerned that the proposed amendments may accelerate the withdrawal of resilient terrestrial telecommunications systems in favour of satellite-dependent services that do not yet demonstrate equivalent reliability under real remote-area operating conditions. The NTCA acknowledges the significant benefits that newer satellite technologies have brought to remote Australia. Many members already use LEO satellite services extensively as part of their communications systems. However, these technologies currently work best as part of a layered and diversified communications framework, not as a complete replacement for



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resilient terrestrial infrastructure. The NTCA believes the current policy direction risks weakening the long-term resilience of communications in remote Australia rather than strengthening it.

Key Issues:

Remote Australia Requires Higher Communications Resilience, Not Lower Standards

The realities of living and operating in remote Northern Australia are fundamentally different to metropolitan Australia. The average station size is 270,000 hectares, with the largest being approximately 1.64 million hectares, more than six times the size of the Australia Capital Territory.

Across the Territory:

- properties can span thousands of square kilometres,
- communities may be isolated for extended periods during the wet season,
- power infrastructure is often privately owned and maintained, and
- emergency response times can be measured in hours rather than minutes.

In these environments, communications reliability is directly tied to safety.

Existing HCRC and Geo Satellite infrastructure provides an important level of resilience because it operates independently of customer-owned off-grid power systems. This means communications can often remain operational during local power failures, equipment breakdowns or severe weather events.

The NTCA is concerned that replacing these systems with customer-powered satellite services removes an important layer of operational redundancy. Remote Australians should not receive a lower practical standard of communications reliability simply because they live outside major population centres.

Layered Communications Infrastructure Is Critical in Remote Australia

One of the NTCA's strongest concerns is that current policy settings appear to underestimate the importance of infrastructure diversity and redundancy in remote telecommunications networks.



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Many remote users already rely on multiple communications technologies simultaneously, including:

- terrestrial HCRC systems,
- mobile services where available (very limited),
- GEO satellite services,
- and LEO satellite systems such as Starlink.

This layered model exists because no single technology currently provides complete resilience across all remote operating conditions.

Satellite services have unquestionably improved connectivity outcomes in many regions. However, NTCA members have also experienced:

- rain fade during severe wet season conditions,
- weather-related service interruptions,
- local power dependency issues,
- and equipment vulnerability during extreme events.

At present, many remote users rely on terrestrial systems specifically because they continue functioning during circumstances where satellite services may degrade.

The NTCA is concerned that the current direction may remove one of the most resilient components within this communications mix while increasing dependence on satellite-only delivery models.

That is not improved resilience. A resilient remote communications framework should strengthen redundancy between terrestrial, GEO and LEO systems, not eliminate one layer entirely.

Strategic Concerns Around Long-Term Infrastructure Direction

The NTCA believes the proposed amendments raise broader long-term questions regarding Australia's remote infrastructure strategy.

While portions of the HCRC network undoubtedly require upgrading and modernisation, the NTCA does not believe the appropriate response is the gradual abandonment of terrestrial capability in



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favour of sole reliance on foreign-owned LEO satellite infrastructure. Remote telecommunications should be considered essential national infrastructure.

The NTCA is concerned that Australia risks:

- reducing sovereign infrastructure capability,
- increasing dependence on externally controlled systems,
- and shifting responsibility for reliability from carriers onto individual consumers.

This is particularly significant in northern Australia where communications networks support:

- critical agricultural production,
- freight and logistics,
- emergency management,
- regional economic activity,
- and national strategic interests.

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

The NTCA believes long-term resilience, sovereign capability and public safety must remain central considerations within USO policy.

Real-World Testing Must Occur Before Existing Services Are Withdrawn

The NTCA is concerned that replacement technologies may be progressing faster than the evidence supporting their operational suitability in remote environments.

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

- independent field testing,



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- multi-season operational assessment,
- wet season and cyclone-region testing,
- emergency reliability benchmarking, and
- direct comparison against existing HCRC performance.

The NTCA is particularly concerned by reports that remote users may be transitioned onto systems that have not yet demonstrated superior performance under the very conditions where communications reliability matters most. Remote Australia should not become a large-scale live trial for critical communications infrastructure changes.

Public Safety and Community Impact

For NTCA members and remote Territory communities, communications outages are not minor inconveniences.

Telecommunications systems are relied upon for:

- medical emergencies,
- RFDS coordination,
- worker safety,
- flood and cyclone response,
- emergency evacuations,
- remote education,
- station operations, and
- maintaining social connection across isolated regions.

In many areas there are no alternative communications pathways available when systems fail.

The NTCA believes the proposed amendments must be assessed not only through a telecommunications policy lens, but also through:

- public safety,
- regional equity,



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- national resilience, and
- community sustainability.

Equity Concerns

The NTCA is concerned that the practical effect of the proposed direction may be to normalise a lower standard of telecommunications reliability for remote Australians.

Remote Australians already face:

- higher living costs,
- higher infrastructure costs,
- greater service limitations,
- and significantly greater exposure to isolation during emergencies.

The purpose of the USO is to ensure Australians are not disadvantaged by geography.

If urban Australians would not reasonably accept communications systems that:

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

then those standards should not become acceptable for remote Australians either.

The NTCA believes communications policy should reduce regional disadvantage — not deepen it.



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Recommendations

The NTCA respectfully calls on the Australian Government to reconsider the current direction of these amendments and prioritise long-term resilience outcomes for remote Australia.

The NTCA recommends that the Government:

1. Retain resilient terrestrial voice infrastructure until replacement systems are independently proven superior under real remote operating conditions.
2. Recognise that satellite services should complement terrestrial infrastructure rather than replace it entirely.
3. Develop a long-term remote communications strategy focused on resilience, infrastructure diversity and sovereign capability.
4. Commit to upgrading and modernising terrestrial infrastructure across remote Australia rather than progressively withdrawing it.
5. Ensure remote Australia maintains layered communications redundancy between terrestrial, GEO satellite and LEO satellite systems.
6. Require independent multi-season testing before approving satellite-only replacement arrangements for critical USO voice services.
7. Establish minimum standards for:
 - a. severe weather performance,
 - b. backup power capability,
 - c. emergency communications reliability,
 - d. and operational uptime in remote regions.
8. Recognise telecommunications infrastructure in northern Australia as essential public safety and nation-building infrastructure.
9. Prevent the transfer of communications reliability responsibility from carriers onto individual remote consumers.
10. Ensure future USO reforms strengthen the long-term liveability, safety and productivity of rural and remote Australia.



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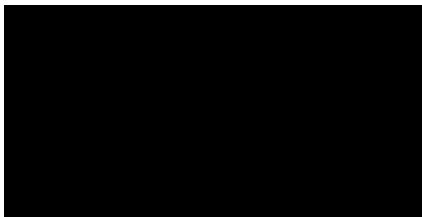
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The NTCA strongly believes that decisions made under these amendments will have consequences for decades to come. Remote Australians deserve communications systems that are resilient, equitable and designed for the realities of operating in some of the harshest environments in the country.

The NTCA urges the Government to demonstrate strong leadership and ensure the future of remote communications in Australia is built around resilience, redundancy and long-term national interest, not reduced infrastructure obligations.

Thank you for the opportunity to provide this submission.

Sincerely,



Romy Carey

Chief Executive Officer

Northern Territory Cattlemen's Association