



**PASTORALISTS'
ASSOCIATION**
OF WEST DARLING est. 1907

Submission: Telecommunications Universal Service Obligation (Standard Telephone Service – Requirements and Circumstances) Amendment Determination 2026.

The Pastoralists' Association of West Darling (PAWD) welcomes the opportunity to provide feedback on the proposed Telecommunications Universal Service Obligation (Standard Telephone Service – Requirements and Circumstances) Amendment Determination 2026.

PAWD represents pastoralists and other stakeholders who live and work in far west New South Wales. We rely heavily on reliable telecommunications for safety, running our businesses, emergency communications and day-to-day connectivity.

PAWD is concerned that the proposed amendments risk weakening practical consumer protections for rural and remote Australians significantly, at a time when many communities are already navigating major telecommunications technology transitions, increasing service complexity and declining resilience.

Of particular concern is the proposal to allow refusal of a standard telephone service where consumers cannot provide adequate electricity supply for replacement technologies.

Historically, many rural and remote consumers relied on network-powered services (including copper and radio-based landline technologies) that continue to operate during power outages. Replacement technologies now increasingly rely on consumer-supplied power, internet connectivity and locally powered equipment.

For many remote telecommunications consumers, a reliable mains power supply is not guaranteed. Properties may rely on stand-alone solar systems, generators and battery infrastructure which are independently funded, maintained and managed by the consumer. Increasing telecommunications power requirements may require expensive upgrades to solar arrays, batteries, inverters and backup systems.

These changes suggest shifting responsibility for essential communications infrastructure from the provider to the consumer without equivalent safeguards, funding or resilience standards.

PAWD is particularly concerned about the implications during emergencies, natural disasters and prolonged outages. In remote Australia, telecommunications are not simply a convenience – it is critical infrastructure. Loss of communications can directly impact:

- access to Triple Zero (000)
- emergency response coordination
- worker safety
- access to medical assistance
- station operations and logistics
- access to weather and emergency information
- business continuity
- personal safety and isolation.

Many remote areas have limited or no mobile coverage, meaning consumers may not have alternative communications pathway if power-dependent services fail.

PAWD is also concerned that telecommunications transitions are proceeding ahead of demonstrated evidence that replacement technologies provide equivalent reliability and resilience under real-world remote Australian conditions.

The increasing reliance on Low Earth Orbit (LEO) satellite services raises additional concerns regarding:

- weather impacts and rain fade
- power dependency
- service resilience during extended outages
- reduced telecommunications redundancy
- concentration of critical communications pathways on satellite systems
- reliance on foreign-owned infrastructure for essential communications services
- geopolitical tensions impacting satellite communications availability
- temporary loss of service due to adverse space weather events
- permanent loss of service due to cascading collisions in LEO (Kessler syndrome)

While PAWD acknowledges the role emerging technologies can play in improving connectivity options, these technologies should complement but not aim to replace resilient terrestrial infrastructure and long-standing network-powered voice services until equivalent reliability and consumer protections are independently demonstrated.

PAWD is also concerned about the increasing complexity of telecommunications migrations and the lack of independent support available to consumers navigating these changes. Many rural consumers are receiving inconsistent or misleading advice regarding available options, rights and protections.

The proposed loss of funding for the Regional Tech Hub further compounds these concerns. Independent, trusted telecommunications support is becoming increasingly important as rural consumers are required to navigate more complex technologies and migration processes.

PAWD supports:

- comprehensive reform of the Universal Service Obligation framework rather than continued piecemeal amendments
- stronger oversight and public reporting during major telecommunications migrations
- enforceable consumer protections for rural and remote consumers
- clear obligations on providers to inform consumers of their rights and available options
- targeted protections for consumers with no mobile coverage or unreliable power
- minimum resilience and backup power standards for replacement voice technologies
- independent testing and verification of replacement technologies under real-world rural and remote conditions before they are recognised as USO-equivalent services.

PAWD believes telecommunications policy must better reflect the realities of remote Australia and ensure rural and remote consumers are not left worse off through technology transitions.

Reliable telecommunications are essential to the safety, productivity and sustainability of remote communities and agricultural industries across Australia.

Thankyou for the opportunity to make this submission.

Lachlan Gall
Councillor