

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*.

We own two properties in the Flinders and Charters Towers Regional Council area. One of these, Lyons Creek, is situated between Torrens Creek and Pentland is approximately 150km from Hughenden and 160k in another Charters Towers.

This property currently relies on CAN Radio / HCRC and limited mobile connectivity for communication.

We do not reside at Lyons Creek and there is no mains power. Power at Lyons Creek is provided by generator power when staying there. The building in this location is best described as shed accommodation, and is not suited to any permanent electrical equipment as the building is not fully sealed from the weather or vermin.

Mobile coverage at Lyons Creek has unreliable coverage, intermittent over the whole of the property despite being only 25km from the nearest tower. Even with Celfi service is unreliable.

Lyons Creek is located on the western edge of the Great Divide is in an area highly prone to bush fire. 23/24 and 24/25 seasons were particularly bad.

For those in our area reliable telecommunications are not optional. Lives and business depend on telecommunications that work 24/7 without intervention from the landholder.

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. In our case, we have had no intention in investing many thousands of dollars to provide consistent uninterrupted power to a building we don't use on a regular basis.

Under these changes, consumers could lose access to essential voice services simply because they do not have the power requirements of newer technologies. This represents a major shift from the traditional Universal Service Obligation, where services like CAN Radio/HCRC continued to operate during outages because they were powered through the network.

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.

In my circumstances, the loss of reliable communications would mean the inability to contact 000 for an ambulance quickly, nor be able to communicate with local fire brigades and neighbors effectively during fire season when other communication methods (mobile or radio) are not working.

I am also concerned that should there be outages to the new satellite based system, that it would not be just isolated to a particular tower area, but whole the WHOLE state or nation relying on this one technology would be without phone communication.

I am concerned that amendments are being progressed while legacy services such as CAN Radio / HCRC are already being withdrawn by Telstra and consumers are being migrated onto technologies with very different operating characteristics and reliability profiles.

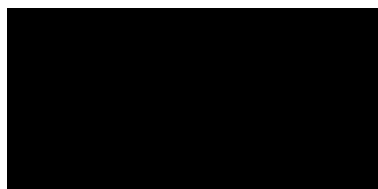
More broadly, these amendments appear to extend and adjust outdated frameworks without broader reform of the Universal Service Obligation or adequate protections to ensure consumers are not left worse off following migration.

I respectfully ask that the Government reconsider these amendments and undertake further consultation with affected rural and remote consumers before progressing these changes. Consultation or advice to consumers has been limited, any information has been discovered via advocacy groups on social media or general discussion in passing from Telstra techs who seem to be proceeding regardless of the migration product being fit for use.

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



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