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President

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Via email: [MobileCoverageRoads@infrastructure.gov.au](mailto:MobileCoverageRoads@infrastructure.gov.au)

Dear Sir/Madam

**Re: Submission to Consultation on design features of the National Regional Roads Australia Mobile Program**

Thank you for the opportunity to respond to the Consultation on the design features of the National Regional Roads Australia Mobile Program (RRAMP). Like all Australians, farmers require quality, reliable, and affordable access to telecommunications to complete everyday tasks from business activities, to education, to catching up with family and friends.

NSW Farmers is Australia's largest state farming organisation and advocates for issues such as the environment, biosecurity, water, animal welfare, economics, trade, workforce, and rural affairs. Agriculture is crucial, employing more than 75,000 people in NSW and the ACT and contributing more than \$24 billion to the economy.

Our goal is to reach \$30 billion in output in NSW by 2030 by supporting stronger farming businesses. We ensure genuine farmer voices shape policies, and we provide specialist advice, along with valuable member benefits.

Regarding telecommunications, the key areas of reform that NSW Farmers considers essential are:

- Accelerated improvements to connectivity infrastructure to ensure farm businesses have access to quality and reliable telecommunications including government co-investment programs to expand coverage.
- Ensuring that key redundancies and protections are in place for rural, regional and remote (RRR) customers during the process of universal services modernisation.
- Accelerating the introduction of mandatory emergency roaming for mobile devices.
- Establishing greater government oversight of largescale telecommunications transitions.
- Developing a Regional Telecommunications Strategy that provides certainty and continuity for future investments and the regulatory environment.
- Promoting competition for regional mobile services.

Important to this consultation is the context that the closure of the 3G network has resulted in a telecommunications downgrade, failing many farmers who have lost the ability to connect due to downgraded mobile coverage and poor service reliability. For many, this means that they have lost mobile coverage at their

**NSW Farmers**

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farms, ongoing disruption of business, and heightening safety concerns. Call dropouts, no signal and inability to access data are now regular frustrations faced due to significantly less reliable voice coverage and severe 4G network congestion despite commitments by providers for equivalence. The downgrade has led to serious concerns that farmers will not be able to make SOS or triple zero calls successfully to emergency services. It is critical that the Australian Government prioritises solutions with telecommunications providers to, at a minimum, recover the coverage footprint and service quality that farming communities had prior to the closure.

Going forward to not only return to the original coverage but to future-proof, NSW Farmers specifically supports the full implementation of and the adequate funding of the 2024 Regional Telecommunications Review recommendations. However, NSW Farmers is concerned regarding one RTIRC recommendation to 'prioritise funding to improve existing terrestrial mobile network capacity, service quality, and resilience, rather than further extending terrestrial coverage'. Continued commitment by State and Federal Government's to ongoing co-investment to expand terrestrial coverage beyond critical areas such as roads is essential to ensure connectivity is fit for purpose for farming communities.

Additionally, development of a Regional Telecommunications Strategy by the Australian Government provides an opportunity to strengthen coordination and provide greater certainty of investments for all levels of Government, industry and stakeholders, for example including initiatives such as NRRAMP. Planning and resourcing for long-term and ongoing telecommunications investments is important to deliver both clarity and much needed improvements in RRR areas as technology continues to advance.

The feedback below is provided in response the consultation discussion paper regarding the role and needs of the NSW farming sector.

#### Importance of Connectivity for Farm Businesses

Continuous and reliable connectivity for farmers along the roads is essential for safety and conducting business in rural and remote areas. Many farming operations span multiple properties or require regular travel to access suppliers, markets, services, and equipment. For example, mobile telecommunications are essential for conducting farm business including communications with staff on properties, logistics with suppliers and truck drivers, agents and accountants to run their farm businesses day to day. Without consistent connectivity along key transport routes, farmers face delays, inefficiencies, safety risk and missed opportunities, all of which can impact productivity and profitability. Ensuring mobile coverage certainty on rural roads is therefore critical to supporting modern, mobile farming businesses.

Consulting rural industries, such as farming, in the prioritisation of new location under the RRAMP is essential to ensure coverage meets the real needs of the communities it is intended to support. The RRAMP provides a critical opportunity to reduce key black spots and improve coverage to support farm business operations and public safety. Relying on telecommunications companies only to determine infrastructure locations risks overlooking critical areas of community need where coverage would deliver the greatest benefit to rural and remote users. Meaningful consultation with local communities and rural industries ensures that public investment is targeted, effective, and aligned with local priorities.

While improving mobile connectivity along roads is important, it should not become the sole focus of State and Federal Government co-investment funding for telecommunications programs. The Australian Government should continue to support Black Spot funding for areas that service farms and rural properties, ensuring that on-property connectivity needs are not overlooked. There remains a significant need for expanded terrestrial mobile network coverage beyond the existing footprint to ensure that connectivity is fit-for-purpose for farm businesses. Currently, farmers remain concerned that if there this is an accident or emergency, the reduced

coverage and network performance will impact their ability to contact help – both for themselves, families and employees.

### Emerging Technologies

Emerging technologies such as low-earth orbit satellites (LEOSats) and direct-to-device (D2D) services are transforming regional telecommunications. LEOSat systems like Starlink have already delivered reliable connectivity to many regional users, and there is now potential to extend this technology to mobile coverage through D2D capabilities. However, many farmers have made significant investment to upgrade equipment including repeaters, aerials, farm IOT devices to be 4G compatible in addition to new internet products such as Starlink to deal with the deteriorated mobile network performance. There is heightened frustration from farmers who have purchased new equipment, will now be required to purchase further new mobile phones to utilise emerging technology like D2D LEOSat. The recent announcement by the Australian Government to establish the Universal Outdoor Mobile Obligation is a positive step forward, and whilst we look forward to how and when this might be implemented, more needs to be done. The role of the terrestrial mobile network and continued co-investment in mobile towers (both new coverage and capability) will remain important to provide a technology mix which can manage capacity, utility, affordability and potential risks.

Recent large-scale infrastructure and technology changes, such as the shutdown of 3G network have left many farmers seriously concerned they will be left behind in future transitions. While timelines remain uncertain, future large-scale telecommunications migrations will occur, whether it involves voice, mobile or broadband services – such as transition to 5G and modernising the USO. While the technology is still evolving, with early D2D services expected to support SMS before progressing to voice and data—its role will be to complement, not replace, terrestrial networks. It is therefore essential that investment in terrestrial mobile coverage continues, particularly beyond major roads and transport corridors. Without this, farmers and rural landholders risk being left without reliable mobile service during the transition to these emerging technologies.

Additionally, increasing productivity on farms depends on adoption of new technology, which in turn relies on certainty of connectivity. Agtech devices are advancing along with their need and requirement for consistent data and reporting, which in turns requires certainty for reliable connectivity. Agtech devices of this kind include, water meters required by regulators, irrigation and soil moisture sensors, monitors on bores and water tanks, automatic weather stations, and machinery telemetry. Existing connectivity barriers for adoption include unreliable service, poor coverage, and increasing congestion on existing mobile towers. Addressing these barriers will support productivity growth in the agricultural sector and the economy as a whole.

### Multi-Carrier Mobile Towers

Government co-funding has also not been successful in encouraging the sharing of publicly subsidised infrastructure between multiple mobile network operators. Telstra has delivered approximately two thirds of the total sites under the Blackspot program across<sup>1</sup> regional Australia which has provided improvements to mobile coverage in some areas. However, this also means that there is still little competition regarding mobile providers for regional customers which reinforces Telstra's high market share

Regional customers often face a monopoly in mobile services, with Telstra as the only provider offering coverage. This lack of competition limits choice, on service quality, and prices. The challenge stems from the high capital cost of building infrastructure in regional areas and the lower return on investment due to smaller populations. To address this, NSW Farmers policy supports that any company receiving public funding should be required to provide wholesale access to their infrastructure. The goal of improving competition in regional

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<sup>1</sup> NSW Farmers submission to the 2024 Regional Telecommunications Review

telecommunications is clear, and we encourage both Federal and NSW Government to support a commercially viable sharing model that delivers the best possible coverage for regional and rural NSW. It is important to avoid outcomes where infrastructure owners limit competitors by offering suboptimal access, such as lower or less effective positions on towers that may not be fit-for-purpose. Whether through passive or active arrangements, a shift toward infrastructure sharing is essential to ensure regional communities have access to competitive, high-quality telecommunications services that keep pace with growing demand for services.

Should you require further information or wish to discuss the above please contact [REDACTED]  
[REDACTED] [REDACTED]

Yours sincerely

[REDACTED]  
Xavier Martin  
**President**