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President

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Universal Services Branch  
Department of Infrastructure, Transport, Regional Development, Communications and the Arts  
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**Re: DRAFT Telecommunications Universal Service Obligation (Standard Telephone Service—Requirements and Circumstances) Determination 2022**

NSW Farmers is Australia's largest state farming organisation, representing the interests of its farmer members across all agricultural commodities in rural and remote areas of the state. We speak up on issues that matter to farmers, whether it's the environment, biosecurity, water, animal welfare, economics, trade, or rural and regional affairs.

NSW Farmers welcomes the opportunity to provide comment relevant to the proposed draft Telecommunications Universal Service Obligation Determination 2022.

The importance of certainty of access to telecommunications through an ongoing Universal Standard Obligation (USO) must not be lost and NSW Farmers strongly supports an ongoing, current and technology agnostic legislated obligation to ensure a minimum standard of quality and reliability, as well as equity of access for all users.

Given the rapidly changing technology for voice service delivery and the increasing pairing of voice and data services, NSW Farmers considers that the Universal Service Obligation should not only be maintained, but extended to all service providers, not just Telstra.

The *Telecommunications Universal Obligation (Standard Telephone Service – Requirements and Circumstances) Determination (No. 1) 2011* was established to ensure that the primary universal service provider (Telstra) adhered to agreed standards and made reasonable endeavours to supply a standard telephone service and increase transparency about decision making regarding the installation and maintenance of such a service.

NSW Farmers notes that the current USO provides for certainty of availability for a standard telephone service – historically a fixed line service delivered by copper wire.

However, since 2011 there have been significant advances in telecommunications technology through fibre optics, mobile, wireless, and satellite, which have broadly increased the variety of service provision and enhanced access to voice and data into premises. This new technology has also increased the number and footprint of telecommunication infrastructure providers and methods by which a telephone service may be accessed.

**NSW Farmers' Association**

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It is NSW Farmers' policy that the USO be extended to all telecommunications services, and therefore seek clarification that a universal service obligation would be applied to all infrastructure providers – Telstra, NBN Co, TPG/Vodafone and Optus. Each has the technology and potential to deliver a voice service accessible in a premises as the technology evolves from copper wire for standard telephone services delivered by a 'fixed line' technology definition.

Given the rapid advancement in telecommunication technology, NSW Farmers considers that the standard telephone service should not only be defined by the way it is delivered, but by the availability of a consistently reliable technology to deliver, as a minimum, voice-based communication and the USO equally applied to the full range of providers.

NSW Farmers notes that with the construction of the NBN network, and with the initial approval of the ACCC in 2012, Telstra has in place a Migration Plan which sets out the steps that Telstra will take to progressively migrate voice and broadband services from its copper and hybrid fibre coaxial networks to the NBN.

It is NSW Farmers' policy to have assurance that the continuation of provision and maintenance of landline services connected via copper wire for regional, rural and remote residents who seek to maintain the service, including due to the lack of reliability of the alternate technologies. This needs to remain at the core of the USO. Should any transition to alternate technology be proposed to the customer, this should only be progressed and agreed by a fully informed customer regarding both the implications and benefits of the change.

While the technology to deliver mobile capability has increased exponentially and the quality and efficiency of mobile access (in general) to voice and data has improved in regional areas with significant populations, there are still major challenges for rural and remote users – and those on the edges of regional areas where topography results in additional challenges.

There remains in place a Copper Continuity Obligation for Telstra for areas outside of the NBN. The roll-out of the NBN network delivers either fibre to the home or fibre to the node (exchange). It is the latter that is most often the case on outer regional, rural and remote areas, meaning that the reliance on copper wire for the final connection for a standard telephone service to individual premises remains high.

NSW Farmers supports the ongoing nature of this obligation particularly for outer regional, rural and remote areas, until an alternate technology is available to deliver the certainty and reliability of access (appropriate to the geographic location) as required for standard voice services under the existing USO.

NSW Farmers highlights that access to reliable, consistent and high-quality voice and data communications is both a priority and an essential safety service for the farm sector operating in outer regional, rural and remote areas. Due to multiple factors, including distance, topography and thin markets, certainty of access to consistent high-quality voice telephony can be challenging for many users.

Without certainty of access to both installation and maintenance of a standard telephone service in these areas there is increased risk of isolation for many farmers, their families and their employees. Given the potential isolation of these users, the importance of a reliable standard telephone service and certainty of repair is vital, particularly during abnormal events such as accidents and natural disasters.

Telecommunication options such as mobile coverage continues to be lacking in regional NSW, a survey by NSW Farmers in 2021 showed that over 78 per cent of respondents are unsatisfied or very unsatisfied with their mobile network coverage and 66 per cent have experienced a slight to significant decline in mobile network coverage. This same survey showed that just under 30 per cent of respondents no longer have a fixed line service, and that of 44 per cent of respondents the quality of the service has declined.

The unreliability of the mobile network means fixed line services are still vital to regional users.

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An assured minimum guarantee to access, is needed for certainty in rural and remote areas across the country. It will also be important that there continues to be a prioritisation of appropriate accessibility services for those challenged by age, mobility ability and health issues to support independent living.

NSW Farmers strongly supports the continuation of the USO and its extension to all telecommunications services. This USO delivers certainty through an important legal requirement that all premises, within reason, are ensured a basic guaranteed access to voice telephony service. We support the continuation of the USO as its own distinct legislative instrument along with a defaulting 10-year sunset clause, but consider that the USO achievement must continually be updated to account for a continually changing telecommunications technology enabled environment.

Should further comment be required, please contact [REDACTED] by email at [REDACTED] or by phone at [REDACTED]

Yours sincerely

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