

Universal Outdoor Mobile Obligation (UOMO) draft legislation

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

14 October 2025

Recommendations

This submission recommends the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts:

1. Focus on the capabilities a Universal Outdoor Mobile Obligation should deliver, such as reliable access to the Triple Zero service, digital government services, and social connections.
2. Develop a dynamic institutional framework that establishes minimum standards for contemporary service needs and enables improvements in service capability and standards as technology and consumer expectations evolve.
3. Establish fit-for-purpose government arrangements that ensure Primary Universal Outdoor Mobile Providers are accountable and transparent.
4. Develop a clear and effective regulatory framework by applying Australia's domestic telecommunications regulatory framework to satellite services.
5. Ensure all mobile plans, current and future, provide access to baseline outdoor mobile coverage that the Primary Universal Outdoor Mobile Provider is obliged to provide under the Universal Outdoor Mobile Obligation.
6. Clarify how the Universal Outdoor Mobile Obligation will impact Mobile Virtual Network Operators.
7. Monitor the introduction of Direct-to-Device technologies to ensure they are performing as expected.
8. Establish an independent monitoring body that includes consumer representation.
9. Create measurable performance indicators for ongoing compliance monitoring.
10. Promote digital literacy programs to improve understanding of the implementation and access to baseline outdoor mobile services.
11. Develop consumer information in accessible formats that clearly explain how consumers can access baseline outdoor mobile services.
12. Consider actively supporting domestic mobile roaming arrangements in regional, rural, and remote Australia.
13. Develop the standards noted in Section 12N before the Universal Outdoor Mobile Obligation commences.
14. Ensure affordable options for low-income and vulnerable consumers to access compatible devices and plans.
15. Create precise enforcement mechanisms with significant penalties for non-compliance.
16. Implement text-to-000 functionality in Australia.

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ACCAN is the peak national consumer organisation advocating trusted, accessible, inclusive, affordable and available communications and digital services.

About this submission

The Australian Communications Consumer Action Network (**ACCAN**) is pleased to provide this submission to the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (**the Department**) on the draft legislation for the Universal Outdoor Mobile Obligation (**UOMO**). ACCAN supports the introduction of the UOMO, which ensures access to a baseline level of reliable mobile connectivity in Australia.

Introduction

The Telecommunications Legislation Amendment (Universal Outdoor Mobile Obligation) Bill 2025 (**the UOMO draft legislation**) introduces a significant reform to Australia's universal services framework. As previously noted by ACCAN, reliable mobile connectivity is crucial to complementing the fixed line services supported by the existing universal services framework in Australia.¹ For instance, the Australian Communications and Media Authority (**ACMA**) highlighted that in 2024, 98% of people in Australia used mobile phones for calls, and 96% utilised mobile phones for text messaging.² Additionally, 95% of Australians connected to the internet using a mobile device in 2024.³

ACCAN supports the Department's introduction of the UOMO, which acknowledges the necessity to modernise Australia's universal services framework. The UOMO ensures that everyone in Australia, regardless of their location, has access to a baseline level of reliable mobile voice and short message service (**SMS**) connectivity outdoors.

Overarching recommendations

Mobile connectivity has become a vital part of daily life in Australia, supporting safety, economic participation, and social inclusion. As of December 2023, there were 34 million mobile services in operation, making mobile networks the primary means through which Australians communicate, access government services, and engage in the digital economy.⁴ The significance of mobile services is particularly notable in regional, remote, and rural (**RRR**) areas, where limited or unreliable connectivity can pose serious risks to safety. In this context, ACCAN recommends that the Department:

¹ Australian Communications Consumer Action Network (ACCAN), *Better delivery of universal services* (Submission, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 8 March 2024) 14.

² Australian Communications and Media Authority (ACMA), *Trends and developments in telecommunications 2023-24* (Communications and media in Australia series, December 2024) 7; Australian Communications Consumer Action Network (ACCAN), *Better delivery of universal services* (Submission, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 8 March 2024) 14.

³ Australian Communications and Media Authority (ACMA), *Trends and developments in telecommunications 2023-24* (Communications and media in Australia series, December 2024) 4.

⁴ Australian Communications and Media Authority (ACMA), *Trends and developments in telecommunications 2023-24* (Communications and media in Australia series, December 2024) 3.

- Focus on the capabilities a UOMO should deliver, including reliable access to the Triple Zero emergency service, digital government initiatives, and social connections.
- Develop a dynamic institutional framework that establishes minimum standards of performance for mobile connectivity that supports contemporary service needs and allows for ongoing improvement of service capabilities and standards as technology and consumer expectations evolve.
- Create appropriate governance arrangements to ensure that Primary Universal Outdoor Mobile Providers (**PUOMPs**) are accountable and transparent.
- Develop a clear and effective regulatory framework by applying Australia's domestic telecommunications regulations to satellite services.
- Ensure that any supporting policies, such as funding programs or spectrum planning, remain technologically neutral and encourage PUOMPs to select the best solutions for the specific needs of each area.

ACCAN strongly supports a UOMO framework that emphasises the capabilities it offers to Australians. Reliable voice and SMS services through UOMO ensure that everyone in Australia can access essential services, including Triple Zero, digital government services, employment opportunities, education, healthcare, and social connections. These capabilities are vital for individuals living in RRR Australia, where limited connectivity can significantly affect safety, well-being, and economic participation. Therefore, ACCAN recommends designing and implementing the UOMO with broader consumer interests in mind through a capabilities framework.⁵

Furthermore, ACCAN advocates for the establishment of a dynamic institutional framework that sets minimum standards for current service needs while providing mechanisms to enhance service capabilities as technology and community expectations evolve.⁶ This framework should include enforceable benchmarks for service reliability, quality, and complaint resolution. Periodic reviews are also necessary to ensure that the UOMO remains aligned with contemporary consumer expectations, including access to mobile data services as Direct-to-Device (**D2D**) technology develops.

In addition, ACCAN recommends creating fit-for-purpose governance arrangements that hold PUOMPs accountable and require them to report transparently on mobile coverage, service quality,

⁵ ACCAN approach to universal services in Australia uses a capabilities framework developed by Amartya Sen. This framework helps identify barriers that limit people's access to the social benefits of communication services. It emphasises 'connectability' to promote social inclusion, economic improvement, social participation, and enhanced safety. Ultimately, ACCAN suggest the universal services framework should aim to facilitate these outcomes through communication services and infrastructure. See, Australian Communications Consumer Action Network (ACCAN), *Better delivery of universal services* (Submission, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 8 March 2024) 7; Amartya Sen, *Development as Freedom* (Oxford University Press, 1999); Nicholas Garnham, 'Amartya Sen's capabilities approach to the evaluation of welfare: Its application to communications' (1997) 4(4) *The Public* 25, 34.

⁶ Australian Communications Consumer Action Network (ACCAN), *Better delivery of universal services* (Submission, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 8 March 2024) 5.

reliability, and consumer complaints.⁷ This governance framework should involve independent oversight, consumer representation in monitoring processes, and regular public reporting to ensure that Australians have confidence in both the operation of the UOMO and the responsiveness of PUOMPs to emerging issues.

Moreover, considering the UOMO's reliance on emerging satellite-based connectivity, Australia's domestic telecommunications regulatory framework must fully apply to satellite services. This regulatory consistency will ensure that consumers using D2D services have access to the same protections and remedies as those relying on terrestrial networks.

Finally, ACCAN supports the UOMO draft legislation's technology-neutral design, which allows PUOMPs the flexibility to meet the UOMO requirements. This approach enables the UOMO to adapt to future technological advancements without needing constant legislative updates. Low Earth Orbit Satellite (**LEOSat**) technology can support mobile services in high cost and hard to reach areas of the country. While we welcome the emergence of LEOSat services as part of Australia's communication landscape, we believe that terrestrial mobile infrastructure remains the backbone of connectivity.

ACCAN recommends that the UOMO draft legislation promote the optimal use of all available technologies that makes the best use of their different capabilities, for example leveraging satellites to address remote mobile black spots. At the same time, Mobile Network Operators (**MNOs**) should also be required to continue to invest in and upgrade terrestrial networks to improve capacity and to ensure there is an additional layer of coverage across the regions. This redundancy is important because it offers increased resilience during natural disasters and other emergencies. ACCAN stakeholders have consistently emphasised the importance of ongoing investment in terrestrial coverage alongside satellite capabilities to ensure that RRR consumers are not solely reliant on one solution. Furthermore, with temporary disaster roaming during outages under consideration by the government, ongoing investment in the terrestrial network cannot be optional.

We consider that there is a strong case for government to set early expectations on continued private sector investment in terrestrial mobile networks given the long lead times involved in these investments, and particularly at the current time when carriers may be prioritising growth in LEOSat services versus terrestrial mobile network investment.

In RRR areas where the market continues to be inherently thin and deeply uneconomic for market participation, it may be necessary for the government to continue programs such as the Mobile Black Spot Program and Regional Connectivity Program, albeit evolving these to accommodate proposals for infrastructure to support alternative technology solutions, and informed by the current national audit of mobile coverage and capacity that is currently underway. Furthermore, we suggest that the Department ensures any supporting policies, such as funding programs or

⁷ Ibid.

spectrum planning, maintain neutrality and encourage PUOMPs to select the best solutions tailored to the specific needs of each area.

UOMO draft legislation

The UOMO draft legislation represents a significant step toward ensuring available mobile coverage for all Australians. However, its effectiveness is compromised by certain ambiguities and omissions that require attention. In this context, ACCAN recommends that the Department:

- Clearly define “reasonably available” in terms of quality, reliability, and response times.
- Include data services as part of the UOMO from the beginning.
- Provide clarity in the Explanatory Memorandum regarding costs and regulatory impacts.
- Explicitly outline the responsibilities of Mobile Virtual Network Operators (**MVNOs**) concerning the UOMO.
- Ensure that all mobile plans, current and future, comply with the UOMO.

‘Reasonably available’

The UOMO represents a major step forward in ensuring Australians can make mobile calls and send SMS wherever they are outdoors across Australia. It is also a significant public safety initiative that seeks to ensure all Australians can reach emergency services on their mobile at outdoor locations. To ensure that the public can have confidence in the promise of outdoor mobile coverage, they must be able to rely on baseline services being available.

Section 12F of the UOMO draft legislation states that the UOMO will “ensure that mobile coverage is reasonably available outdoors to all people in Australia on an equitable basis.” However, ‘reasonably available’ is not a defined term in the draft legislation and different perspectives can be taken on what constitutes ‘reasonable’. This open-ended language creates significant uncertainty regarding what constitutes ‘reasonable’ mobile coverage. It creates opportunity for providers to circumvent their obligation and disputes over compliance could arise. Service providers may interpret ‘reasonably available’ too narrowly, leading to inconsistent application across different regions. A service provider may also argue that its ability to make the service reasonably available was impacted by an event that was within its control (as opposed to one beyond their control). Additionally, the lack of clear benchmarks could leave consumers without enforceable rights to challenge subpar service.

In principle, there should be very limited circumstances where coverage is not accessible when a consumer is outdoors. In this regard, we seek greater detail and clarity on the operation of Sections 12F(3)(b) and 12F(4) which permit the Minister to exempt specific locations or circumstances from UOMO requirements. As there is a risk that exemptions could be applied too broadly, inadvertently undermining the policy’s goal of equitable access, we propose that this power be guided by explicit criteria in the legislation, for example, whether they relate to geographic barriers, cost issues, or technological limitations.

It’s also essential to note that Australians expect to rely on mobile services for access to Triple Zero in life-threatening situations. In this context, we question whether ‘reasonably available’, in its current undefined form, is adequate in the absence of clear reliability and performance standards for mobile networks and D2D services. A dropped call, weak signal, or delayed connection during

an emergency can be the difference between life and death. There is an important opportunity for the UOMO draft legislation to advance reliability standards for emergency connectivity above the baseline of ‘reasonable’, ensuring that service providers commit to standards that support emergency resilience.

Mobile data services

Currently, Section 8BB of the UOMO draft legislation defines designated mobile telecommunications services as voice and SMS, along with any other that “the Minister may, by legislative instrument, determine as a kind of mobile telecommunications service”. This approach risks relegating mobile data services to an optional or future consideration. However, the ACMA reports that 95% of Australians rely on mobile devices for internet access, making data connectivity essential to accessing services rather than an add-on.⁸ Excluding data services from the start would render the legislation outdated upon its implementation. While D2D data services may not be considered feasible to be offered on a universal basis now, traditional mobile data is. ACCAN looks forward to working with the Department on the inclusion of mobile data services as a baseline service in the UOMO.

Costs and regulatory impacts

The UOMO framework will impose additional obligations on PUOMPS along with possible additional compliance costs. However, the UOMO draft legislation and explanatory memorandum are silent about the government’s expectations for the additional costs that service providers may pass onto consumers for the provision of the additional services, and the implications for affordability of mobile services for consumers.

An important premise underlying the policy rationale for outdoor mobile coverage to be designated as a universal service is the view that everyone should be entitled to access these services if they require it. However, an individual’s ability to access services that they need also depends on the affordability of the service. Given the currently high costs of LEOSat-based D2D services, and depending on how service providers pass these costs onto consumers, it is possible that certain groups of consumers who require the baseline services and may be the intended beneficiaries of the policy reform, cannot afford them. This potentially undermines the effectiveness of the initiative.

ACCAN recommends that the forthcoming Explanatory Memorandum provide detailed clarification on the implications of the UOMO for service pricing and potential government subsidies. It should also assess the market impacts on RRR communities, while ensuring that equitable access to mobile services is framed as a right that supports safety and participation in society. ACCAN understands that any actions that the government may take in relation to targeted subsidies or other measures may be developed outside of the UOMO framework, but these may still be designed to complement the policy objectives of universal services. Having clarity on the

⁸ Australian Communications and Media Authority (ACMA), *Trends and developments in telecommunications 2023-24* (Communications and media in Australia series, December 2024) 4.

approach the government will take going forward will be helpful. Further discussion around the importance of affordable access to baseline mobile outdoor coverage by specific consumer cohorts is set out in the latter part of the submission.

Role of MVNOs

ACCAN suggests that the Department clarify the role of MVNOs within the UOMO draft legislation. Section 12L of the UOMO draft legislation defaults the UOMO obligations to the three major MNOs (Telstra, Optus, and TPG).

However, many Australians purchase their services through MVNOs. The UOMO draft legislation should clarify that while MNOs are responsible for infrastructure obligations, MVNOs and resellers are also accountable for ensuring their customers receive the benefits of UOMO.

Compliant mobile plans

The UOMO draft legislation does not clarify whether UOMO will be incorporated into existing mobile plans or offered as separate, UOMO-specific plans, with separate or incremental pricing. Consumers need assurance that all current and future mobile plans, including those provided by MVNOs, will meet UOMO requirements without requiring additional upgrades or more expensive services. Early and upfront guidance from the Department on its expectations on this matter is necessary and could be given effect through Section 12N(1)(a), so that service providers develop mobile plans that maximise affordable access to the baseline services to encourage take up and avoid any consumer confusion and inequity, particularly for those in RRR areas of Australia.

We are also concerned about the competition implications of limiting the UOMO to the PUOMPS. If MVNOs are not required to provide UOMO services, and the PUOMPS are not required to re-sell services to the MVNOs it could create affordability challenges and hinder competition for RRR consumers. Without UOMO capabilities, there may be little incentive for consumers to choose services from MVNOs, which would further solidify the dominance of major MNOs in the market.

Implementation considerations

ACCAN supports the establishment of the UOMO but acknowledges potential implementation considerations that need to be addressed to ensure meaningful outcomes for all Australians.

Therefore, ACCAN recommends that the Department:

- Monitor the introduction of D2D technologies to ensure they perform as expected and can be relied upon to underpin baseline services on a universal basis and to the standard expected by consumers.
- Establish an independent monitoring body that includes consumer representation.
- Promote digital literacy programs to enhance understanding of the implementation and access to the UOMO.
- Develop consumer information in accessible formats that clearly explain how consumers can access the UOMO.
- Actively consider supporting domestic mobile roaming arrangements in RRR Australia.

ACCAN acknowledges that the UOMO relies on emerging satellite D2D technologies to support universal mobile coverage. While D2D technologies have significant potential to enhance coverage, they also pose execution risks. If the systems do not perform as expected, or if there are limitations in device compatibility and availability during the initial stages, consumers may face challenges. Therefore, the Department should adopt a cautious yet proactive approach, which includes contingency planning and rigorous monitoring, to ensure that consumers do not lose access to essential services during the transition.

To build public trust and ensure accountability, ACCAN recommends the establishment of an independent monitoring body that includes consumer representation. This aligns with the 2024 Regional Telecommunications Independent Review Committee's recommendation to establish a Regional Telecommunications Commissioner or Regional Telecommunications Advisory Panel to oversee the modernisation of universal services.⁹ We recommend this body should oversee compliance with the UOMO, verify claims regarding service coverage and reliability, and ensure that consumer concerns are taken into account in ongoing decision-making and adjustments. Independent oversight is crucial to preventing compliance gaps and safeguarding Australians' access to universal services.

ACCAN also recommends investing in digital literacy and connectivity programs, particularly aimed at RRR communities. These programs should educate consumers about UOMO's capabilities, device requirements, and service limitations, enabling them to use UOMO effectively.

Consumer materials on UOMO should be created in Easy English and Easy Read formats, as well as other accessible formats, to ensure inclusivity and accessibility. This approach ensures that individuals with low literacy skills, disabilities, and those from culturally and linguistically diverse backgrounds have access to relevant information. This information must clearly explain how to access UOMO, what equipment may be required, and where consumers can seek assistance. Providing clear and accessible information is essential to ensure that no consumer is excluded from the UOMO due to communication barriers.

Finally, ACCAN recommends that the Department actively consider revisiting the case for domestic mobile roaming arrangements.¹⁰ Domestic mobile roaming can enhance the use of existing and emerging infrastructure and improve coverage, particularly in RRR areas where competitive investment is less likely. By combining domestic mobile roaming arrangements with the UOMO, network resilience could be strengthened, ensuring that consumers receive optimal coverage, service continuity and choice of provider.

⁹ See, Regional Telecommunications Independent Review Committee (RTIRC), *2024 Regional Telecommunications Review: Connecting communities, reaching every region* (Final report, 2024) 12.

¹⁰ Australian Communications Consumer Action Network (ACCAN), *National Regional Roads Australia Mobile Program* (Submission, Department of Infrastructure, Transport, Regional Development, Communications, Sports and the Arts, 6 June 2025).

Upfront establishment of enforceable standards, rules, and benchmarks

ACCAN recommends the Minister directs the ACMA to create a clear and enforceable regulatory framework for the UOMO as noted in Section 12N, 12P, 12Q, and 12R. Without enforceable standards, rules, and benchmarks, there is a risk that the UOMO may provide coverage in theory but fail to deliver meaningful outcomes for consumers in practice.

We recommend the Minister determine the proposed standards, rules and benchmarks outlined in Section 12N(1)(a)-(h) before the enactment of the UOMO. In addition, the Minister should develop standards that:

- Ensure affordable options for low-income and vulnerable consumers to access compatible devices and plans.
- Create clear enforcement mechanisms with significant penalties for non-compliance.
- Create measurable performance indicators for ongoing compliance monitoring.

Affordability options

As noted earlier, for the UOMO to truly achieve universal access, it is essential that all Australians can access it. This involves providing affordable options for low-income and vulnerable consumers to obtain compatible devices and service plans that enable them to use D2D services. ACCAN urges the Minister to develop a standard that supports the affordability of compatible devices and plans as part of the UOMO. Without these provisions, certain consumers including those that are intended to be beneficiaries of the UOMO will continue to be excluded from its benefits.

For instance, LEOSat technology will predominantly be utilised by consumers living in RRR Australia, where the median average incomes range from \$33,800 to \$51,999.¹¹ Furthermore, First Nations communities are already disproportionately affected by the digital ability gap and have a higher reliance on mobile-only connectivity, facing even greater risks of digital exclusion if targeted subsidies are not introduced. Research has shown that over half of First Nations households (53.3%) sometimes or often sacrifice essentials, such as food or bills, to stay connected.¹² This high level of unaffordability underscores the urgent need for measures to ensure that access to LEOSat services is available to low-income and vulnerable consumers.

Compounding these affordability challenges is the current lack of low-cost, LEOSat-compatible devices. Currently, most available options are premium smartphones, which places further financial pressure on consumers in RRR and low-income communities. Without the introduction of more affordable devices or targeted subsidies, the high upfront cost of compatible hardware risks

¹¹ Regional Australia Institute, *Beyond city limits: Unveiling income premiums in regional Australia* (Report, 2024) 15.

¹² Featherstone D, Ormond-Parker L, Ganley L, Thomas J, Parkinson, S, Hegarty K, Kennedy J, Holcombe-James I, Valenta L, Hawkins, L, *Mapping the Digital Gap. 2023 Annual Report* (Report, ARC Centre of Excellence for Automated Decision-Making and Society, 2023) 5.

deepening existing digital inequities and limiting the potential benefits of LEOSat technology for those who need it most.

Enforceability

The UOMO framework should include clear enforcement mechanisms to ensure that PUOMPs meet their obligations. This framework should impose significant penalties for non-compliance, highlighting the importance of mobile connectivity for public safety.

ACCAN considers the enforceability of the UOMO will be significantly hampered without the development of minimum service standards prior to the implementation of the obligation. This should apply across different technology types. Minimum service standards provide consumers with clear benchmarks to evaluate service reliability and function to keep industry accountable for their network performance. Performance standards should clearly outline requirements for the delivery of voice, SMS, and data services through the UOMO and be responsive to the changing nature of consumer's needs and expectations. Performance standards developed under the UOMO should be complemented by standards for the delivery of universal services through terrestrial networks to ensure all Australians can access reliable telecommunications services.

Ongoing compliance monitoring

Finally, ACCAN recommends that the ACMA be given the authority to develop standards and equivalent measurable performance indicators for ongoing compliance monitoring. To foster public trust, compliance results should be published regularly, providing independent assurance that UOMO is being implemented as intended.

UOMO and access to Triple Zero services

When the Albanese Labor Government announced the UOMO, one of its stated policy objectives was to expand access to Triple Zero services in Australia.¹³ However, the D2D technologies identified as critical to the success of the UOMO in RRR Australia currently support only SMS functionality. This limitation makes it essential for Australians to be able to contact Triple Zero via text message. Currently, Australians can only directly contact emergency services via voice calls.

To achieve the UOMO's policy objective of expanding access to Triple Zero, the Australian Government must establish a text-to-000 service. The implementation of text-to-000 is essential while D2D technologies remain limited to SMS and do not support full voice-calling capabilities. ACCAN is concerned that the UOMO may fail to meet its intended policy objectives, as outlined by the Albanese Labor Government, if text-to-000 is not available for everyone across Australia.

¹³ The Hon Michelle Rowland MP, *Albanese Labor Government building Australia's mobile future* (Media Release, 25 February 2025) <<https://minister.infrastructure.gov.au/rowland/media-release/albanese-labor-government-building-australias-mobile-future>>.

Conclusion

Australians depend heavily on mobile connectivity, and the UOMO represents a practical step toward modernising the universal services framework. ACCAN supports the expectations outlined by the National Farmers' Federation, emphasising that the UOMO should be clear, measurable, enforceable, and focused on consumer needs.¹⁴ By ensuring strong governance and accountability measures, the UOMO can fulfil its promise of providing universal coverage and enhance consumer confidence in Australia's communication services.

We thank the Department for the opportunity to comment on the UOMO draft legislation. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact [REDACTED]

The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers. ACCAN is committed to reconciliation that acknowledges Australia's past and values the unique culture and heritage of Aboriginal and Torres Strait Islander peoples.

¹⁴ National Farmers Federation (NFF), *Statement of expectations universal outdoor mobile obligation* (Statement of expectations, 12 August 2025) <<https://nff.org.au/wp-content/uploads/2025/08/NFF-Statement-of-Expectations-UOMO-12-August-2025.pdf>>.

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