

16 October 2025

Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts
CANBERRA ACT 2601
Via online portal

To whom it may concern,

Re: Consultation on the Universal Outdoor Mobile Obligation (UOMO) draft legislation

GrainGrowers welcomes the opportunity to provide a submission to the Consultation on the Universal Outdoor Mobile Obligation (UOMO) draft legislation

GrainGrowers is a national organisation working to enhance the profitability and sustainability of Australian grain growers. GrainGrowers achieves this through focus areas of policy and advocacy, grower engagement, thought leadership and active investment in future focused activities for all growers. Australian growers are at the heart of all that GrainGrowers does and the focus of its work.

Overview of the bill and current policy gap

The proposed Telecommunications Legislation Amendment (Universal Outdoor Mobile Obligation) Bill 2025, if enacted, would represent the government's promised commitment to ensuring mobile phone service "anywhere you can see the sky." However, the draft legislation falls short of enshrining what should be the UOMO's foremost priority: the guaranteed provision of 000 and emergency call access.

At current the bill does not mention "000", "emergency calls", or the Emergency Call Service (ECS) at all. It fails to mandate that outdoor mobile coverage must support emergency calling functionality, nor does it require carriers to provide fallback or cross-network emergency access in areas with limited coverage or reliance on a single tower. At current the draft bill relies on indirect coverage obligations to support emergency access. Without these safeguards, the bill risks delivering coverage without ensuring life-saving connectivity.

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Suggested amendments to the draft 'Telecommunications Legislation Amendment (Universal Outdoor Mobile Obligation) Bill 2025'

It is critical that emergency call service access is enshrined in legislation. We seek that government consider the following suggestions, or propose other viable guarantees to ensure vital emergency call service access:

- A designated mobile telecommunications service must include the capability to initiate calls to the Emergency Call Service (ECS), including 000, 112, and 106, from any location where the service is reasonably available outdoors.
- A carriage service provider must take reasonable steps to ensure that ECS access is resilient, interoperable, and maintained during network outages or service degradation.
- The Minister shall be able to determine minimum performance standards for ECS access, including: (a) fallback mechanisms across networks; (b) fault rectification timelines; (c) coverage resilience in disaster-prone or remote areas.

Regarding other matters within the draft legislation

GrainGrowers works closely with the National Farmers' Federation on telecommunications matters and supports the other items and potential improvements to the bill raised in their submission.

Should we be able to provide further assistance or if there are any enquiries relating to this submission please contact [REDACTED], Advocacy and Rural Affairs Manager at [REDACTED]

Yours sincerely,

[REDACTED]
[REDACTED]
[REDACTED], Policy and Advocacy