



Submission to the Universal Outdoor Mobile Obligation Draft Legislation Consultation

The First Nations Digital Inclusion Advisory Group (Advisory Group) welcomes the opportunity to provide a submission to the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (the Department) consultation on the exposure draft for the proposed Telecommunications Legislation Amendment (Universal Outdoor Mobile Obligation) Bill 2025.

The Advisory Group was established by the Minister for Communications in 2023 to provide advice on progressing Target 17 of the National Agreement on Closing the Gap, which aims for equal levels of digital inclusion for First Nations Australians by 2026. Target 17 underpins Outcome 17 of the National Agreement, which is focused on ensuring First Nations Australians have access to information and services enabling participation in informed decision-making regarding their own lives.

Our advice is founded on a strong belief that digital inclusion is a human right and is a key enabler of self-determination and empowerment for First Nations people and communities. This position reflects the National Agreement for Closing the Gap and the United Nations Declaration of the Rights of Indigenous Peoples, both of which the Australian Government are signatories to.

The feedback provided in this submission is consistent with the recommendations in our [initial report](#) and the [First Nations Digital Inclusion Roadmap](#), as well as our submissions to the Better Delivery of Universal Services Review and the Funding of Universal Telecommunications Services. These submissions can be found here: [Submissions | First Nations Digital Inclusion Advisory Group](#).

Accessible, equitable and affordable coverage

The Advisory Group welcomes the Telecommunications Legislation Amendment (Universal Outdoor Mobile Obligation) Bill. We understand that the objective of UOMO is to provide a framework to ensure that mobile coverage is reasonably available outdoors to all people in Australia on an equitable basis, and that coverage will be accessible via terrestrial or direct-to-device (D2D) technology.

We support the technology agnostic approach of the draft bill as, for many communities, if baseline mobile coverage is to be achieved in the medium to long term, connectivity will rely heavily on Low Earth Orbiting Satellites (LEOSats) and D2D technology. In order to access this technology, the affordability of D2D handsets needs to be a key consideration for Primary Universal Outdoor Mobile Providers (PUOMPs), as otherwise many First Nations Australians may, in practice, be excluded from the benefits of UOMO due to the cost of handsets and plans.

The Advisory Group recommends that the requirement for affordable devices be addressed prior to implementation, as well as the requirement for different payment options, including prepaid. The Advisory Group also recommends reviewing consumer protections to ensure that D2D are fit for purpose to prevent misselling of devices that are unusable or too expensive.

Telecommunications Resilience

The Advisory Group is concerned that telecommunications resilience has not been built into the draft bill. First Nations communities are severely disadvantaged by ageing infrastructure, extreme weather conditions and regular power outages. These issues disproportionately affect remote First Nations



communities, and we recommend that these issues be addressed prior to implementation to prevent any further disadvantage, including access to Triple Zero.

To address our concerns, we believe it is essential that:

- PUOMPS work closely with Telstra in its role as USO provider to ensure primary and secondary connections
- resilient power supplies for telecommunications, including generators and /or renewable solar / battery power along with trained local staff to troubleshoot
- the provision of satellite phones or Cells on Wheels (COWS) to communities affected by outages
- the requirement to future proof infrastructure to address the impact of climate change.

It is our recommendation that the UOMO include the requirements that PUOMP's co-locate and share infrastructure. The newly established industry-led First Nations Telecommunications Working Group, which reports to the Advisory Group, is currently examining this issue with the support of the department, the Australian Communications and Media Authority and the Australian Competition and Consumer Commission.

Conclusion

The draft bill is a positive step towards modernising the telecommunications framework. UOMO presents the opportunity to partially address First Nations digital inclusion. The Advisory Group asks that the Australian Government consider further investment opportunities and engage with First Nations people and communities to ensure that PUOMPS offer place-based solutions.

Noting a number of matters which are at the discretion of the Minister (such as the introduction of regulatory instruments addressing issues such as standards, rules and benchmarks applying to PUOMPs), we recommend the creation of dedicated First Nations provisions to address the affordability and telecommunications resilience issues raised in this submission, which would, in our view, reflect the Australian Government's commitment to Target 17 and the National Priority Reforms.

The Advisory Group would welcome and encourage any trials to be conducted in partnership with remote First Nations communities to specifically test the issues raised here and in our Roadmap.

We would be happy to discuss the contents of this submission further. If you would like to do so, please contact [REDACTED]



Co-Chair

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