



President
Ref: 251070C

17 October 2025

Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts
Australian Government

Via email: uomo@infrastructure.gov.au

Submission to Draft legislation Consultation - Telecommunications Legislation Amendment (Universal Outdoor Mobile Obligation) Bill 2025

NSW Farmers welcomes the opportunity to respond to the Australian Government's *Telecommunications Legislation Amendment (Universal Outdoor Mobile Obligation) Bill 2025*. The Universal Outdoor Mobile Obligation (UOMO) if done correctly, represents an opportunity toward addressing longstanding connectivity inequities faced by rural, regional, and remote Australians.

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 by 2030 by supporting stronger farming businesses. We ensure genuine farmer voices shape policies, and we provide specialist advice, along with valuable member benefits.

NSW Farmers supports the intent of the Uomo initiative as a technological advancement to ensure that basic mobile voice and SMS services are available to all Australians. This initiative should act as a compliment to the terrestrial mobile coverage and in no way impact on planned future investment and programs such as the Blackspot Funding Program. In regard to farming, reliable mobile connectivity is essential for community and workplace safety, economic participation, access to education, and the adoption of digital agriculture technologies.

NSW Farmers is a member of the National Farmers Federation and strongly supports the principles and considerations outlined in the industry-led of [UOMO Statement of Expectations](#). Additionally, the Association supports the submission and recommendations made by the NFF to this consultation.

A cornerstone of any Universal Services framework is the provision of reliable telecommunications and guaranteed access – ensuring individuals can connect whenever and wherever needed. Yet, for many rural and regional Australians, inconsistent and unreliable service remains a persistent challenge. While technological advancements have expanded access for some, these improvements must be underpinned by a robust framework that sets and enforces minimum service standards tailored to the unique needs of rural and regional communities. Equally as important is regulation to ensure that providers and carriers are accountable to their obligations, and safeguards to ensure these are enforced and penalties commensurate.

The legislation's technology-neutral design is positive, as well as its alignment with the existing Universal Service and Statutory Infrastructure Provider frameworks. However, there are concerns that the draft

NSW Farmers

ABN 31 000 004 651 PO Box 459 St Leonards NSW 1590 Level 4 154 Pacific Highway St Leonards NSW 2065
Member Service Centre 1300 794 000 T 02 9478 1000 F 02 8282 4500 www.nswfarmers.org.au

legislation's use of terms such as 'reasonably available' will become a loophole for avoiding obligations on reliability and affordability.

Important to the context of this Bill is the shutdown of the 3G network which led to a telecommunications downgrade in rural, regional and remote NSW. The network transition has led to many farmers losing their ability to connect due to poor mobile coverage and service reliability. For many, this means that they have lost mobile coverage at their farms, created ongoing disruption of business, and heightening their safety concerns. Call dropouts, no signal and inability to access data are now regular frustrations faced due to significantly less reliable voice coverage and the congested 4G network. The downgrade has led to serious concerns that farmers will not be able to make SOS or triple zero calls successfully to emergency services. As such, future technology transitions such as the UOMO must have greater Government oversight to minimise issues for customers and avoid unintended impacts.

Achieving the UOMO's objectives will require attention to several key areas to ensure that it is fit-for-purpose and can deliver the promise of extending and safeguarding access to basic mobile voice and SMS services to regional stakeholders such as farmers. A summary of key issues and recommendation identified by NSW Farmers in regard to the Bill are outlined below.

Key Issues and Recommendations

1. Network Resilience and Integration

While Direct-to-Device (D2D) technology offers new opportunities, terrestrial networks remain the backbone of mobile connectivity. NSW Farmers considers that continued co-investment in terrestrial mobile infrastructure from both providers and state and federal governments is critical for rural, regional and remote communities. Similarly, full implementation of the recommendations of the 2024 Regional Telecommunications Review recommendations is essential to futureproof regional connectivity needs. This includes stronger oversight of technology transitions and a comprehensive Regional Connectivity Strategy. The UOMO must complement not replace investment in ground-based networks. If re-allocation of spectrum from mobile to LEOsat networks is required to enable this development, NSW Farmers cannot support any changes that would reduce the capacity of the existing network at this stage.

2. Clear Standards and Performance Benchmarks

The legislation allows for the Minister to create a legislative instrument that sets regulatory standards and performance benchmarks for the UOMO. Regulatory standards must be developed to provide customers with certainty and assurance. The proposed regulation should be open for future consultation and feedback and should incorporate transparent performance standards that define what constitutes 'reasonably available' coverage. Development of benchmarks for call reliability, SMS delivery, latency, and fault rectification is essential and should be developed collaboratively not just with carriers but regional stakeholder that represent customers. The role of the National Audit of Mobile Coverage could be expanded to verify both terrestrial and satellite performance to provide more objective data points on the service.

3. Accessibility and Affordability

NSW Farmers emphasises that any technical limitations on the D2D technology must not be used to avoid compliance. D2D is an emerging technology, and its practical implementation and reliability in rural settings remain uncertain. Terrestrial coverage improvements should prioritise regions where D2D could be unreliable such as heavily timbered or under structures that could cause potential disruptions. The cost of devices and plans compatible with D2D services must remain affordable and the cost of compliance must not be passed disproportionately to rural, regional and remote consumers. Implementation of UOMO must ensure transparent and fair pricing for UOMO services.

4. Accountability and Sovereignty

The framework should include clear enforcement powers to ensure compliance by all Primary Universal Outdoor Mobile Providers (PUOMP). The Australian Communications and Media Authority (ACMA) should be

NSW Farmers

given the appropriate enforcement power to achieve this. NSW Farmers also encourages the Government to consider and address sovereign risks associated with foreign-owned satellite constellations and to ensure that data and service continuity are protected under Australian law. This should ensure that disincentives for non-compliance by non-Australian companies are significant to protect our national connectivity interests. Equally, carriers cannot rely on a single LEOSat provider such as SpaceX as this heightens risk for remote customers due to over-reliance on only one provider with no redundancy for alternate connectivity technology - particularly in emergency situations and outages.

5. Future Adaptability

NSW Farmers acknowledges that LEOSat technology does not currently support universal data services. The Minister and the Department must ensure that the UOMO framework is set up to include mobile data services as an urgent priority as the technology capability becomes available. Ongoing review through mechanisms such as the Regional Telecommunications Review will be essential to maintain the UOMO's relevance and effectiveness.

There are several areas that require further detail and clarification to help in assessing the Bill's effectiveness and implementation, and to ensure appropriate safeguards. These are outlined below:

- There will need to be accountability for service failure as the third-party satellite providers are not bound directly to UOMO. This creates a risk that PUOMPs may deflect responsibility for non-compliance onto their satellite partners, undermining the integrity of the obligation.
- Requirements for PUMOPs to publish accurate up-to-date coverage maps showing both terrestrial and satellite service availability to ensure clarity for customers.
- How the UOMO framework ensure seamless access to emergency services in areas covered by D2D satellite technology as emergency services are regulated separately and the technology cannot currently support text message access.
- The criteria that will be used to determine whether the UOMO can be commenced before 1 December 2028.
- That mechanisms will be available for rural consumers to report service failures or lodge complaints under the UOMO.
- Clarity on the responsible regulator investigating and enforcing compliance, for example ACMA.

The UOMO has the potential to be a significant advancement in universal telecommunications policy. However, critical to underpinning the successful delivery of the legislation's promise of safe, reliable, and equitable mobile connectivity for all Australians are clear standards, fair cost structures, and continued investment in resilient terrestrial networks. To ensure the obligation delivers original intent of ensuring that all Australians have access to critical emergency communications regardless of location and public safety objectives, NSW Farmers considers it essential that Triple Zero access be enshrined in the UOMO legislative framework.

Should you wish to discuss this submission or require and further information you are invited to contact NSW Farmers policy advisor [REDACTED].

Yours sincerely,

[REDACTED]

President

NSW Farmers

ABN 31 000 004 651 PO Box 459 St Leonards NSW 1590 Level 4 154 Pacific Highway St Leonards NSW 2065
Member Service Centre 1300 794 000 T 02 9478 1000 F 02 8282 4500 www.nswfarmers.org.au