

Response to the Universal Outdoor Mobile Obligations Bill

Introduction

The Local Government Association of the Northern Territory (LGANT) welcomes the opportunity to provide a submission on the Universal Outdoor Mobile Obligation (UOMO) draft legislation.

LGANT is the voice of local government, representing 18 councils across the NT. This membership consists of five municipal, three shire and ten regional councils, and one associate member. LGANT provides leadership, support, representation, and advocacy on behalf of our member councils for the benefit of their communities.

Local government councils are the sphere of government closest to the community, and they know their community's priorities. Councils are responsible for local roads, street signage, stormwater drainage, lighting, footpaths, parking, cycle ways, parks and playgrounds, sporting fields and courts, swimming pools, public toilets, animal management, land and coast care programs, libraries, waste management, cemeteries, and community events and programs such as youth support, sport, and child and aged care – and in some places, deliver Centrelink and Australia Post services.

LGANT advocates for the needs of some of Australia's most remote and underserved communities. For our councils and the communities they serve, telecommunications are not a luxury, they are a lifeline. Reliable, affordable, and equitable telecommunications underpin essential council services such as child and aged care, emergency management, and local business operations. They are critical for health, education, economic participation, and social inclusion.

Yet, the NT faces some of the most severe telecommunication's challenges in the nation. Only around 30% of the Territory's landmass has mobile coverage. Councils are often unable to fully leverage digital technologies to improve productivity, deliver services, or respond to emergencies. The persistent digital divide undermines liveability, safety, and opportunity for all Territorians.

Reliable, affordable, and equitable telecommunications are essential for the social, economic, and cultural wellbeing of all Territorians. The Uomo Bill is a significant step towards addressing the longstanding digital divide experienced by regional and remote communities in the NT.

LGANT welcomes the opportunity to comment on the draft Universal Outdoor Mobile Obligation (UOMO) legislation.

Alignment with LGANTs Advocacy

LGANT supports the Bill's core objective to make outdoor mobile voice and SMS coverage "reasonably available outdoors to all people in Australia on an equitable basis." This aligns with LGANT's advocacy for:

- Universal Outdoor Coverage: The Bill's objective to make outdoor mobile voice and SMS coverage "reasonably available outdoors to all people in Australia on an equitable basis"

directly aligns with LGANT's advocacy for universal, reliable mobile coverage, particularly in remote and regional areas.

- **Technology-Neutral Solutions:** The Bill's support for using a mix of existing infrastructure and emerging technologies, including Low Earth Orbit (LEO) satellites and direct-to-device (D2D) connectivity, reflects LGANT's call for innovative, technology-neutral approaches to closing coverage gaps.
- **Equity and Inclusion:** The focus on reducing the digital divide and improving access for Indigenous and remote communities is consistent with LGANT's priorities.
- **Minimum Standards and Accountability:** The Bill's provision for enforceable standards and benchmarks for service quality and reliability is welcomed, as is the establishment of clear obligations for carriers.

Identified Gaps

While the Bill is a significant step forward, LGANT notes that there are several important gaps that have not been addressed.

The Bill is limited to outdoor voice and SMS coverage, whereas NT communities also need reliable indoor coverage and affordable mobile data to support health, education, and economic participation.

While the legislation focuses on expanding outdoor mobile coverage, it does not address the ongoing and critical role of payphones in remote and vulnerable communities. Several of the most heavily used payphones in Australia are located in the NT, reflecting their ongoing importance where mobile coverage is lacking or unreliable.

Payphones are often the only telecommunications option for many residents, especially those who cannot afford a mobile phone or live in areas with no or fragile mobile coverage. For highly mobile Indigenous populations and other vulnerable groups, payphones remain a "technology of last resort" and a vital safety net for accessing essential services, emergency help, and staying connected.

LGANT strongly advocates that payphones should be regarded as a foundational component of the Universal Service Obligation (USO). Their ongoing maintenance must be a legislative responsibility. To ensure truly equitable access, the legislation should explicitly require that part of the universal coverage obligation includes the responsibility to maintain payphones in remote and underserved communities, recognising that not all residents have access to mobile phones and that payphones are sometimes the only available telecommunications option.

There is also no provision to enshrine ACMA's consumer vulnerability expectations in law or require telcos to justify pricing disparities between pre-paid and post-paid services. This regulatory gap disproportionately affects remote Aboriginal communities, where the majority of users rely on pre-paid mobile services due to limited financial capacity and lack of access to stable income or banking facilities. The significantly higher cost of pre-paid services compared to post-paid plans creates an inequitable burden, effectively penalising those who are already economically disadvantaged. Without legislative safeguards or pricing accountability, these communities remain vulnerable to systemic pricing discrimination in essential digital access.

Digital Inclusion: While the legislation addresses physical infrastructure by mandating outdoor mobile coverage, it does not address the broader challenge of digital inclusion. Many Territorians,

especially in remote and Indigenous communities, face significant barriers to digital participation, including the high cost of devices and data and limited digital skills. The Australian Digital Inclusion Index shows the NT has the lowest “Access” and “Affordability” scores in the nation, and a substantial gap in “Digital Ability.” LGANT has consistently advocated for investment in digital skills, affordability measures, and meaningful connectivity, arguing that true digital inclusion requires not just coverage, but also the ability for all residents to access, afford, and effectively use digital technologies for health, education, business, and social participation. The legislation should be complemented by targeted programs and funding to close these gaps and ensure all Territorians can fully benefit from improved telecommunications.

The legislation also does not address the frequent communications outages experienced in remote NT communities, which often occur due to accidental damage to telecommunications lines (such as from digging) or power outages that knock out mobile network infrastructure. These outages can leave entire communities without any means of communication—posing serious risks during medical emergencies, natural disasters, and other critical situations. Such service interruptions are a regular occurrence in remote areas but would not be tolerated in urban Australia. If the Bill is to deliver on the promise of universal coverage, it must also include requirements for infrastructure upgrades, network redundancy, and the stabilisation of power sources to ensure that coverage is not only available, but reliable and resilient when it is needed most.

Recommendations

- 1. Expand the Scope:**
Extend the obligation to include indoor coverage and mobile data or commit to developing enforceable standards for these in future regulations.
- 2. Protect Payphones:**
Recognise payphones as essential infrastructure in remote and vulnerable communities, with strict rules for removal and mandatory maintenance.
- 3. Strengthen Consumer Protections:**
Enshrine ACMA’s consumer vulnerability expectations in law and require transparency in telco pricing for pre-paid and post-paid services.
- 4. Promote Digital Inclusion:**
Invest in digital skills, affordability measures, and support for meaningful connectivity, not just infrastructure.
- 5. Strengthen Network Resilience and Redundancy:**
Require that universal coverage obligations are supported by infrastructure upgrades that ensure network redundancy and reliable backup power, so that remote and regional communities are not left without communications during outages caused by power failures, equipment damage, or other disruptions.

LGANT welcomes the intent of the UOMO legislation and looks forward to working with the Government to ensure that the final framework delivers equitable and reliable telecommunications for all Territorians.

For any further follow-up please contact LGANT on [REDACTED]
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