

AUSTRALIAN TELECOMMUNICATIONS ALLIANCE SUBMISSION

To: Department of Infrastructure, Transport, Regional
Development, Communications, Sport and the Arts

Re: Universal Outdoor Mobile Obligation (UOMO) draft legislation

19 October 2025



1. AUSTRALIAN TELECOMMUNICATIONS ALLIANCE

The Australian Telecommunications Alliance (ATA) is the peak body of the Australian telecommunications industry. We are the trusted voice at the intersection of industry, government, regulators, and consumers. Through collaboration and leadership, we shape initiatives that grow the Australian telecommunications industry, enhance connectivity for all Australians, and foster the highest standards of business behaviour. For more details, visit www.austelco.org.au.

For questions on this submission, please contact [REDACTED]

2. INTRODUCTION

The Australian Telecommunications Alliance Satellite Services Working Group (ATA SSWG) appreciates the opportunity to make a submission in response to the Australian Government's consultation on the *Telecommunications Legislation Amendment (Universal Outdoor Mobile Obligation) Bill 2025*.

In principle, the ATA SSWG members support this initiative to deliver high quality mobile services but have a number comments on particulars as outlined below.

This submission reflects the interests of the ATA satellite operators. It does not necessarily represent the views of Mobile Network Operators or other ATA members.

3. DEFINITION OF SERVICES

Under the proposed Subsection 8BB, designated mobile telecommunications services are defined as:

- Mobile voice services.
- Mobile messaging (SMS).
- Any other mobile telecommunications service determined under Subsection 2.

The ATA SSWG supports the baseline obligations of these mobile services including access to the emergency (Triple Zero) service.

The ATA SSWG agrees that the technical capability of broadband data services is in varying stages of maturity for Direct-to-Device (D2D) systems. Today this capability exists for space-based broadband mobile services operating in terrestrial frequencies, however, for Mobile Satellite System Non-Terrestrial Networks (NTN), these bands will need to be incorporated into handsets before this becomes usable. These services should therefore be included once they are widely-available.

4. TECHNOLOGY-NEUTRAL

The ATA SSWG supports the draft Bill being technology-neutral but notes that the supporting explanatory information infers that LEOSats exclusively can provide D2D services. D2D services can be provided through LEOSats as well as MEOSats and GEOSats and this should be included in future explanatory documentation.

5. RADIO FREQUENCY SPECTRUM

Access to spectrum is vital for the delivery of D2D mobile services to unmodified handsets. The ATA SSWG suggests the Minister direct ACMA to support new spectrum allocations currently being studied under International Telecommunications Union (ITU) WRC-27, even if some sharing with existing terrestrial mobile services is required. Such decisions should not delay the finalisation of the UOMO.

The ATA SSWG notes that some S-Band (2 GHz) MSS spectrum is about to be allocated, and it appears ACMA is determined to auction the spectrum. The SSWG does not support auctions of satellite spectrum as it is an inherently global resource and auctions will impose costs that are unnecessary and burden the price of services which are key to solving the digital divide. The ATA SSWG suggests the Minister direct ACMA to look at other approaches.

6. CONCLUSION

The ATA SSWG supports these amendments to include D2D technology MSS services as part of the UOMO to provide mobile coverage Australia wide, but suggests the Department add Mobile Broadband to the mix as soon as it is widely-available.

The ATA SSWG also suggests the Minister keep a close eye on spectrum availability and intervene if necessary.

Ends

