



08 April 2026

Committee Secretary
Senate Standing Committees on Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600

via email: ec.sen@aph.gov.au

Dear Chair and Committee members,

RE: Telecommunications Legislation Amendment (Universal Outdoor Mobile Obligation) Bill 2025

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission to the Environment and Communications Legislation Committee's (the Committee's) inquiry into the *Telecommunications Legislation Amendment (Universal Outdoor Mobile Obligation) Bill 2025* (the Bill).

For rural, regional, and remote Australians mobile connectivity is not a luxury; it is a lifeline. It underpins safety, productivity, economic participation, and access to essential services such as health, education, and emergency services. The importance of the Universal Outdoor Mobile Obligation (UOMO) will be heightened for Australians in regional, rural and remote areas, who will rely on the obligation to secure mobile coverage they have never had, or have never been able to depend on.

This correspondence is provided as a companion to the NFF's October 2025 submission on the draft legislation for the Committee's consideration. It does not seek to duplicate that submission, but rather to focus on the recommendations we consider most important, and on practical implementation considerations that will determine whether the UOMO works as intended.

Effective implementation will be critical to ensuring the obligation ultimately achieves its objectives. In the NFF's view, this includes ensuring that consumers are clearly informed both of the existence of the service and of how to connect to it in practice. Trusted, independent services such as the Regional Tech Hub will play a central role in communicating this information and supporting consumers to access and use UOMO-enabled services.



The NFF has had regard to, and recommends the Committee consider in its totality, the *Next Generation Connectivity for Australian Agriculture* report, commissioned by AgriFutures Australia and released in March 2026 (the AgriFutures Connectivity Report). The report provides contemporary, stakeholder-informed evidence on the capabilities and limitations of emerging Low Earth Orbit satellite and direct-to-handset technologies, and is directly relevant to the practical implementation of the UOMO.

UOMO as a critical foundation, not a standalone solution

The NFF has been a strong and steadfast supporter of the Australian Government's UOMO initiative since it was announced in early 2025. It represents a significant modernisation of Australia's universal service framework, reflecting the central role mobile connectivity now plays in safety, productivity and social participation.

At the same time, the UOMO should be understood as a foundational reform that will be most effective when implemented as part of a broader, coordinated approach to regional connectivity. It should complement, not substitute for, existing universal services, ensuring that baseline outdoor mobile coverage is added as an additional layer of safety rather than achieved at the expense of established services.

The Bill is being progressed during a period marked by:

- increasingly frequent and severe natural disasters;
- heightened scrutiny of the reliability of emergency calling arrangements, including Triple Zero; and
- long-standing erosion of consumer confidence in coverage claims and service reliability in regional Australia.

Expectations for the UOMO are already high. Meeting, and appropriately managing, those expectations will require a coordinated and comprehensive approach to regional connectivity. Without this, the UOMO risks delivering improvements in coverage on paper, while falling short of the real-world reliability and safety outcomes that farmers urgently need.

The NFF's most critical recommendations

While the NFF's submission sets out a comprehensive suite of recommendations, we wish to highlight three that are critical to the UOMO delivering real improvements on the ground.

1. Performance standards and guarantees must precede commencement

The success of the UOMO will hinge less on the existence of the obligation itself, and more on what it guarantees in practice.



Minimum, enforceable standards, covering voice and SMS reliability, latency, fault rectification and service availability, should be developed and settled prior to commencement, not retrospectively. Without these standards, consumers will have no clear understanding of what they are entitled to expect, and regulators will have limited capacity to enforce outcomes. These standards must also be subject to ongoing monitoring and review to ensure they remain fit for purpose over time, and responsive to real-world performance and consumer experience as technologies and delivery models evolve. This approach will also be critical in identifying and addressing unforeseen issues that may only emerge once services are operational, a challenge well recognised in previous network transitions.

This is particularly important where UOMO services may be delivered via direct-to-device (D2D) satellite technologies, which bring different and evolving performance characteristics. The AgriFutures Connectivity Report highlights that emerging satellite and D2D services can deliver important baseline capabilities, but that their performance characteristics differ materially from terrestrial mobile networks and may vary depending on device, environment and network conditions. Standards must therefore be technology-neutral, but grounded in real-world usability rather than theoretical availability. This should include clarity on device compatibility requirements, recognising that handset availability and configuration will be critical to whether consumers can practically access UOMO services.

2. Emergency access must be an explicit and testable capability

The NFF reiterates that access to Triple Zero and emergency assistance must be treated as a core UOMO capability, not merely an assumed by-product of coverage.

For farmers, fishers and rural workers, mobile connectivity is intrinsically linked to workplace health and safety. A service that technically exists but fails under congestion, cannot sustain a call, or does not reliably function in emergencies does not meet community expectations or public safety needs.

Analysis in the AgriFutures Connectivity Report underscores that D2D satellite services are primarily designed to support basic messaging and emergency use cases, rather than continuous or broadband-grade connectivity. While these services can deliver meaningful safety benefits, they should not be assumed to provide equivalent reliability or functionality to terrestrial mobile networks in all conditions. This reinforces the need for emergency access under the UOMO to be treated as an explicit, testable capability rather than an implied outcome of coverage.

The Committee may also consider how UOMO services will be audited and tested against disaster and peak-demand scenarios, and prioritised during emergencies.

3. “Equitable basis” must be meaningful to consumers



The Bill's requirement that services be delivered on an "equitable basis" is welcome, but unless clearly defined, it risks becoming aspirational rather than operational.

Equity must encompass:

- affordability, particularly where market competition is limited;
- access across prepaid, post-paid and Mobile Virtual Network Operator (MVNO) plans; and
- freedom from unreasonable device or plan exclusions.

The original Universal Service Obligation ensured essential voice services were affordable regardless of location. The UOMO must do the same, ensuring baseline outdoor mobile connectivity is delivered on terms rural Australians can genuinely access and use. NFF members are strongly focused on pricing outcomes and the need for clear assurances that the cost of delivering the obligation will not result in exorbitant or unfair charges being passed on to rural consumers.

Implementation risks

In addition to reiterating these core recommendations, the NFF encourages the Committee to consider several implementation issues that sit beyond the text of the Bill, but which will determine its success.

Coverage mapping and claims

Few issues have caused more frustration for rural consumers than the disconnect between coverage maps and lived experience.

As the UOMO is implemented, clarity will be needed on:

- how UOMO coverage will be mapped and represented, both on land and in Australian waters;
- whether maps will express usability, rather than just availability; and
- how satellite-delivered coverage and its limitations will be communicated.

We encourage the Government to involve consumer organisations and regional users in the development of coverage representation standards, and to provide for independent verification of UOMO coverage claims, building on existing mechanisms such as the National Audit of Mobile Coverage. Coverage maps should be as accurate, reliable and practically useful as possible for rural, regional and remote Australians.

Managing expectations during transition

With a default commencement date several years away, communities will reasonably ask what improves in the interim.

The NFF is concerned that without a clear transition narrative, there is a risk of:

- delayed investment in terrestrial networks;



- confusion about the role of UOMO relative to existing programs; and
- unrealistic assumptions about the pace and maturity of emerging technologies.

The AgriFutures Connectivity Report also highlights the risk of consumer confusion where emerging satellite services are incorrectly perceived as full replacements for terrestrial mobile coverage, underscoring the importance of clear service descriptions, realistic coverage mapping and proactive expectation management during the transition to UOMO implementation.

A strong commitment from the Government as to the continued role of programs such as the Mobile Black Spot Program and the Mobile Network Hardening Program will be essential to prevent a pause in regional investment.

Accountability

As mobile services increasingly rely on combinations of terrestrial and satellite infrastructure, clear consumer accountability becomes even more important.

From a rural consumer's perspective, responsibility must rest with the primary provider, regardless of the number of underlying technologies involved. Complaint handling, fault rectification and redress mechanisms must remain simple and accessible, particularly given the safety-critical contexts in which rural mobile services are used. Consideration should also be given to how UOMO-related outages are reported and communicated, including ensuring that current and active disruptions are easy for consumers to identify in real time, rather than obscured by historical information.

The need for a broader, coordinated rural connectivity plan

Finally, while essential, the UOMO cannot on its own resolve longstanding rural connectivity challenges.

During a period of heightened disaster risk and rapid technology transition, Australia requires a long-term Regional Connectivity Plan, as recommended by the 2024 Regional Telecommunications Review. In the context of the UOMO, such a plan should set clear expectations around:

- ongoing public and private investment in resilient terrestrial infrastructure; and
- coordination between universal service reform, emergency communications policy, and consumer safeguards.

Evidence from the AgriFutures Connectivity Report highlights that connectivity outcomes in regional and remote Australia are shaped by more than the availability of individual services. The report identifies consumer confidence, service reliability, readiness for adoption and integration with existing systems as critical factors influencing whether connectivity improvements translate into practical benefits.



This underscores the importance of avoiding piecemeal reform. Improvements in one part of the system, such as expanded baseline coverage, may fail to deliver better outcomes, or may exacerbate existing pressures, if related issues such as resilience, affordability, consumer understanding and emergency preparedness are not addressed in parallel.

The UOMO should therefore be implemented as part of a coordinated, system-wide approach to regional connectivity, rather than treated as a standalone solution. Done well, this approach will strengthen confidence in the system and give the UOMO the best chance of delivering lasting improvements for regional Australia.

The critical role of the Regional Tech Hub

In this context, the NFF wishes to specifically highlight the importance of the **Regional Tech Hub**, and to strongly encourage the Australian Government to confirm funding for the Hub beyond 30 June this year.

A universal service reform of this scale cannot succeed without a trusted, independent mechanism to support consumers in navigating it.

As the UOMO is implemented, the Regional Tech Hub will play a critical role in supporting rural consumers to both access and effectively use UOMO-enabled services by:

- providing free, independent and practical advice to help consumers understand their phone and connectivity options, including how UOMO-enabled services may interact with existing terrestrial and satellite services;
- supporting device, plan and network literacy so consumers can select compatible devices and plans, troubleshoot issues, and make informed decisions about how to get connected and stay connected;
- assisting consumers to interpret coverage information and service claims, including understanding the practical limitations of different technologies in real-world conditions; and
- supporting preparedness and resilience by helping households, farms and small businesses plan for connectivity during outages, disasters and service disruptions, including understanding backup options and emergency communications arrangements.

The AgriFutures Connectivity Report identifies connectivity literacy, integration capability and access to independent, trusted advice as significant barriers to effective adoption of next-generation connectivity, even where services are technically available. This underscores the critical role the Regional Tech Hub will play in supporting rural consumers to understand the capabilities and limitations of



UOMO-related services, navigate device and plan requirements, and make informed decisions about connectivity options.

In the NFF's view, continued funding for the Regional Tech Hub is not supplementary to the UOMO, but fundamental to its effective operation and long-term credibility.

Conclusion

The NFF strongly supports the intent of the Bill and expresses its appreciation for the Committee's consideration of the complex issues it raises. We look forward to working constructively with the Australian Government and other stakeholders to ensure that the UOMO delivers meaningful, reliable and trusted outcomes for rural and regional Australians.

The policy contact for this matter is Ms Charlotte Wundersitz, General Manager (Rural Affairs) [REDACTED]

Yours sincerely,



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