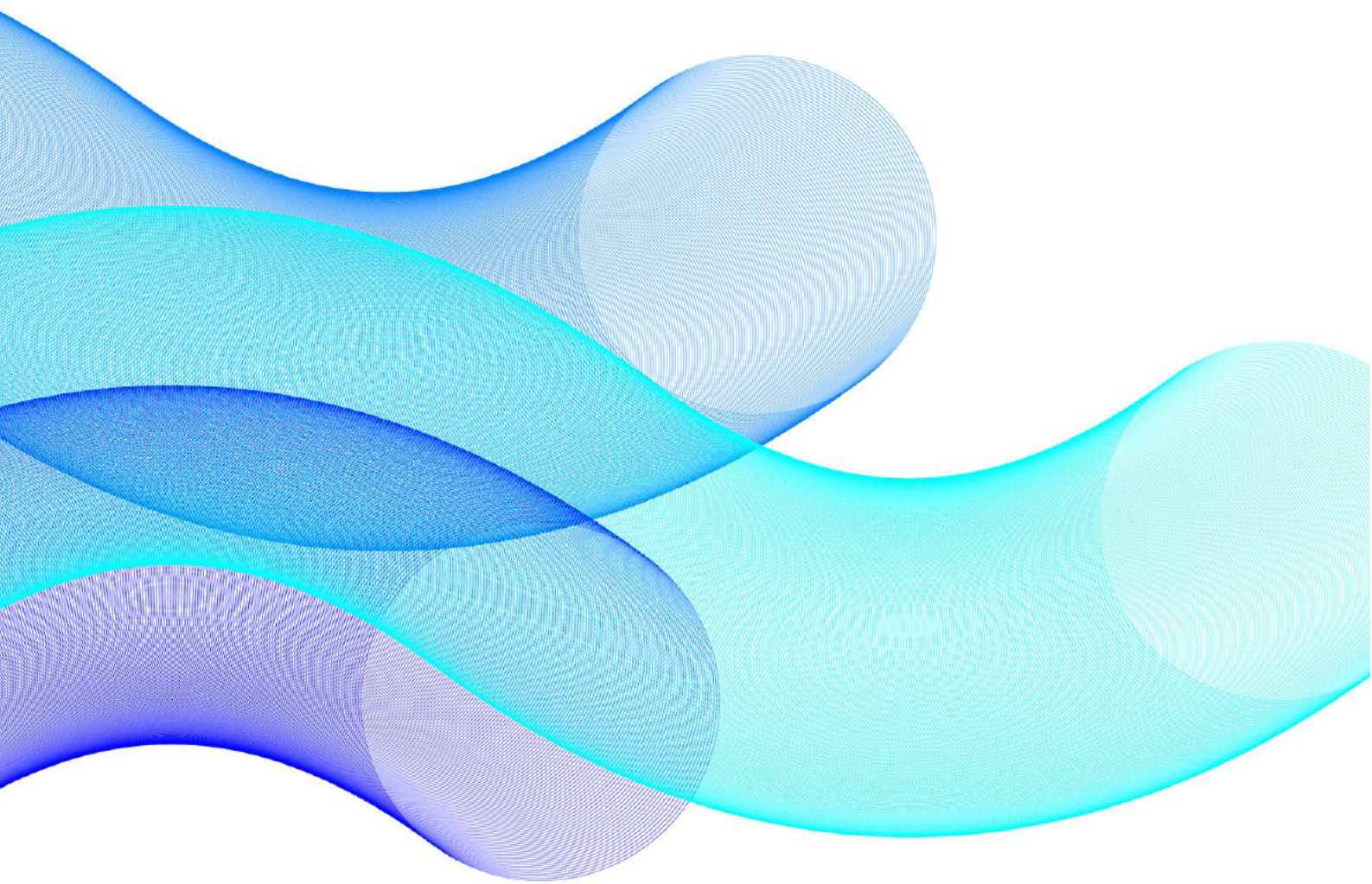
Vocus Submission

Telecommunications Legislation Amendment (Universal Outdoor Mobile Obligation) Bill 2025

8 April 2026



About Vocus

Vocus, Australia's specialist fibre and network solutions provider, owns and operates 50,000km of secure, high-capacity fibre connecting all Australian mainland capitals with New Zealand, Asia, and the USA. Through more than two decades of sustained investment in building and expanding this secure fibre network, Vocus has become one of Australia's largest network infrastructure providers, delivering neutral, carrier-grade connectivity at national scale.

Beyond the fibre network, Vocus operates a growing network of submarine cables spanning nearly 15,000kms that includes the Australia Singapore Cable, North-West Cable system, the Darwin-Jakarta-Singapore system, and the PPC-1 cable from Sydney to Guam.

Vocus plays an integral role in the Low Earth Orbit (LEO) satellite ecosystem through its ground infrastructure capability and deep expertise in building LEO satellite gateways. This role is reinforced by Vocus' national fibre backbone, which provides foundational infrastructure to connect satellite ground stations – enabling revolutionary high-speed connectivity to 100% of Australia's landmass, no matter how remote.

Vocus owns a portfolio of well recognised brands catering to enterprise, government, wholesale, small business and residential customers across Australia. For more information, visit vocus.com.au.

Executive Summary

Vocus welcomes the opportunity to make a submission to the Senate Environment and Communications Committees' *Inquiry into the Telecommunications Legislation Amendment (Universal Outdoor Mobile Obligation) (UOMO) Bill 2025.* Vocus is committed to advancing the Government's vision to use transformative technology to make Australia the most connected continent by 2030.

We broadly endorse the objectives of the *Telecommunications Legislation Amendment (Universal Outdoor Mobile Obligation) Bill 2025* (Bill) to ensure that Mobile Network Operators (MNOs) deliver baseline outdoor mobile coverage to all Australians on an equitable basis. This is a critical step towards modernising Australia's universal service framework.

However, as acknowledged in the Government's response to the 2024 Regional Telecommunications Independent Review Committee Report (RTIRC), the UOMO '*is not a 'silver bullet solution' for regional connectivity. The MacTiernan Review recognises the importance of broader universal service reform, and the Government has consulted on and is carefully considering potential approaches to improve delivery and funding of baseline fixed services provided to homes and businesses.*"[1]

Therefore, Vocus recommends the following:

1. **Universal Common Offering Layer:** Unlocking more satellite ground stations, connected to high-capacity terrestrial fibre, will be critical to expanding coverage to deliver the UOMO. As outlined in previous submissions, Vocus recommends considering opportunities to establish shared, neutral infrastructure for ground stations, including the terrestrial fibre networks and associated backhaul infrastructure required to connect stations into mobile networks. Establishing a universal common offering layer would support the MNOs to deliver their obligations, as well as potentially expand the pool of Primary Universal Outdoor Mobile Providers (PUOMPs).[2]
2. **Urgently Modernise Funding Arrangements**: Urgent funding reform is needed to align investment with Australia's future connectivity needs. Vocus supports the view that emerging technology, including Direct to Device (D2D) and LEO satellites will be critical to delivering the UOMO.[3] However, the current public funding model continues to subsidise legacy technologies while requiring consumers to pay for unsubsidised, super alternatives such as LEO satellites.

Together, these recommendations aim to strengthen the UOMO framework to ensure all Australians can access reliable, future-ready connectivity.

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[1] Australian Government, '*Australian Government response to 2024 Regional Telecommunications Independent Review Committee report*' (September 2025) p4.
[2] Vocus, '*Vocus submission – Allocation design for the technical matters for the 2 GHz MSS band consultation*' (20 August 2025).
[3] The Hon Anika Wells MP, Albanese Government takes next steps on regional telecommunications reform' (18 September 2025) < Albanese Government takes next steps on regional telecommunications reform | Ministers for the Department of Infrastructure>.

Universal Common Offering Layer

Achieving the UOMO requirements will require a substantial investment in ground stations and fibre networks to enable MNOs to deliver D2D services at scale. To accelerate delivery of the UOMO and reduce duplication of investment, Vocus recommends exploring models to establish a universal common offering layer of neutral ground infrastructure, accessible to multiple MNOs as well as any future PUOMPs.

Building shared, neutral ground stations with fibre connectivity would support the accelerated delivery of UOMO by lowering barriers to entry and enabling MNOs to deliver D2D services more quickly. Critically, the use of shared, neutral infrastructure potentially unlocks economies of scale and provides stronger investment value. By enabling multiple providers to operate from shared sites, the model avoids duplicative capital expenditure on similar ground station facilities built in close proximity and accelerates service availability. Importantly, this approach also supports more efficient investment in the terrestrial fibre and backhaul networks required to connect ground stations into broader telecommunications networks.

The other potential benefits include:

(a) **Enhanced Public Safety:** Enabling a shared, industry-wide D2D model will allow the expansion of Triple Zero access and strengthen emergency service capabilities nationwide.
(b) **Infrastructure Resilience:** The shared ground segment improves overall network resilience and spectrum efficiency, making it a technically robust solution.
(c) **Service Diversification**: This model would facilitate broader industry participation in satellite service delivery via neutral infrastructure. The diversification of providers reduces dependence on a single provider, which promotes stronger competition and consumer outcomes, as well as service resilience.
(d) **Economic Growth:** Expanding satellite service availability is essential to bridging the digital divide to include remote and regional communities in the growing digital economy. It also underpins the future competitiveness of Australia's critical sectors, which will require enhanced communications services to embrace automation and deploy technologies at scale.

Vocus also recommends considering providing dedicated spectrum to satellite operators to deliver neutral ground infrastructure which multiple providers could use. This approach is being considered in many other countries such as the US, Canada, Brazil, Japan and the UK in order to advance D2D services. Historically, spectrum – such as the 2GHz Mobile Satellite Services (MSS) band – has been allocated to MNOs. This would potentially unlock spectrum-as-a-service models and broaden market participation in satellite services.

Building the universal common offering layer would require considered collaboration across government and industry. From an industry perspective, this type of model relies on the availability of certain technologies and coordinated participation across the supply chain. A key requirement will be the availability of ground station providers that can operate as independent national infrastructure and manage a high volume of satellite traffic. Traditional ground stations typically track one satellite at a time, creating congestion and limiting the full potential of satellite networks. Emerging technologies are now addressing this challenge, paving the way for scalable, shared infrastructure.

One such example of this innovation is Vocus's investment in Quasar Satellite Technologies (Quasar). By leveraging the CSIRO's technology, Quasar enables stations to connect with hundreds of ground stations simultaneously, significantly increasing throughput and reducing congestion. Combined with Vocus's leadership in LEO ground station services and network management, this partnership exemplifies how advanced electromagnetic interference (EMI) mitigation capabilities and multi-beam phased array can enable efficient spectrum usage and co-existence with other existing users and non-terrestrial systems. This is an important example of the transformative technologies which can be used to establish national satellite infrastructure that supports high-volume, multi-provider access – laying the foundations for a universal common offering layer. This type of model would accelerate the objectives of the UOMO, by potentially widening the range of providers who can use neutral ground infrastructure to deliver coverage.

Urgently Modernise Funding Arrangements

Delivering the UOMO using emerging technologies requires urgent reform of outdated public funding arrangements that continue to subsidise legacy technologies. As a leader in LEO satellites, Vocus recognises that these technological advancements are rewriting the connectivity rulebook for regional communities and industries.[4] Modernising policy

[4] Vocus, 'From niche to mainstream: How LEO Satellite is transforming remote Australia today' (28 April 2025) < https://www.vocus.com.au/vocus-blog/from-niche-to-mainstream-how-leo-satellite-is-transforming-remote-australia-today>;

settings to support targeted, technology neutral investment will be critical to enabling the efficient delivery of the UOMO objectives.

The Government's response to RTIRC recognised that '*Looking forward, the Government will continue to ensure reform, program modernisation and investment in regional connectivity is directed to areas of greatest need and impact, informed by the findings and recommendations of the MacTiernan Review.*'[5] Vocus supports this development and has expressed longstanding concerns, as outlined in other submissions, that funding arrangements are failing regional, remote and rural Australians.[6] Our core proposition is simple: public funds should deliver public services. Where public funds are available, they should be allocated through competitive processes that maximise service outcomes for Australian consumers.

Under the current Universal Service Obligation (USO) funding arrangements, consumers ultimately bear the cost of industry levies including the Telecommunications Industry Levy (TIL) and the Regional Broadband Scheme (RBS). The TIL primarily funds Telstra's delivery of standard telephone services and payphones, while the RBS funds NBN Co's delivery of broadband services, including through the Statutory Infrastructure Provider (SIP) regime. The existing USO funding schemes were designed around legacy service models and require urgent reform to effectively address regional, remote and rural connectivity challenges.

The introduction of the UOMO creates an additional universal service framework that will also require sustainable funding. While the draft UOMO Bill enables the use of Public Interest Telecommunications Services Special Account (PITSSA) funds to support contracts or grants for the UOMO, it is critical that consumers are not asked to bear the cost of another levy-based scheme before the existing USO funding arrangements are reviewed holistically. Modernising the TIL and RBS frameworks is a necessary precursor to ensure public funding across all universal service mechanisms, including the UOMO, is targeted and effectively used to maximise service outcomes for Australian consumers.

We strongly urge reform of public funding arrangements to adopt a competitive, technology-neutral approach that directs investment toward solutions capable of meeting the connectivity needs of all Australians and fully realising the potential of the UOMO.

Vocus, 'Vocus fast tracks LEO satellite service deployment' (14 July 2024) <https://www.vocus.com.au/vocus-news/vocus-fast-tracks-leo-satellite-service-deployment>.

[5] Australian Government (n 1) p8. The 2024 RTIRC Report recommended '*rigorous evaluations of the current telecommunications investment programs to ensure public investment is well targeted and efficiently delivered.*'[5] In response, the Government has acknowledged that '*The MacTiernan Review recognises the importance of broader universal service reform, and the Government has consulted on and is carefully considering potential approaches to improve delivery and funding of baseline fixed services provided to homes and businesses'.*

[6] See previous submissions, including Vocus, '*Sunsetting of the Telecommunications (Participating Persons) Determination* (2025); Vocus, '*Funding of universal telecommunications services discussion paper'* (2024) <https://www.infrastructure.gov.au/sites/default/files/documents/futs2024-vocus.pdf>; Vocus, '*Vocus Response to 2024 Regional Telecommunications Review'* (2024) <https://www.infrastructure.gov.au/sites/default/files/documents/rtirc-2024-240731-vocus-response-rtirc.pdf>.