



**Australian Government**

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

# **TELECOMMUNICATIONS LEGISLATION AMENDMENT (UNIVERSAL OUTDOOR MOBILE OBLIGATION) BILL 2025**

**SUBMISSION TO THE ENVIRONMENT AND  
COMMUNICATIONS LEGISLATION COMMITTEE**

**8 April 2026**

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## Introduction

On 5 March 2026, the Senate referred the Telecommunications Legislation Amendment (Universal Outdoor Mobile Obligation) Bill 2025 to the Environment and Communications Legislation Committee for inquiry and report by 14 May 2026. The Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts welcomes the opportunity to provide this submission to the committee's inquiry.

## Policy Context

The Bill, introduced by Minister Wells on 27 November 2025, establishes a framework to create a Universal Outdoor Mobile Obligation (UOMO) and complements the existing universal services framework. The Universal Service Obligation (USO) is a statutory and contractual requirement on Telstra to provide fixed voice services upon reasonable request and make payphones reasonably available nationally. Its purpose is to ensure Australians have 'reasonable access' to baseline voice services irrespective of where they live. It is complemented by the Statutory Infrastructure Provider (SIP) regime set out in Part 19 of the *Telecommunications Act 1997* which provides separate protections to ensure access to high speed broadband services at premises. The Bill will bring mobile services within the universal services framework for the first time.

Extensive material on the Bill has been provided in the Explanatory Memorandum. This submission therefore focuses on the key issues, themes and questions which have been raised so far in Parliamentary debate. The department is available to provide the committee with additional information or background if requested.

## Background

Access to mobile telecommunications is essential to people in Australia, especially in regional, rural and remote areas. Stakeholders have longstanding concerns about the public safety implications of gaps in terrestrial mobile coverage, including on many regional and remote roads, and during natural disasters. Terrestrial mobile coverage is widely available within populated areas but only covers about a third of the Australian landmass. Prior to the Uomo being announced all mobile operators (MNOs) had announced intentions to offer a direct to device (D2D) service on a commercial basis, and/or network testing and commercial partnerships. SMS services supported by D2D satellite platforms have begun to fill the gap but are currently offered by Telstra alone and are not yet available to all Telstra customers. As demand for D2D and the technical capability of devices increases the availability of compatible devices and plans is expected to increase.

The Uomo will require the national mobile network operators, Telstra, Optus and TPG Telecom (and any other providers designated in the future), to provide baseline mobile coverage outdoors across Australia on an equitable basis. They will be required to do this by the default day (1 December 2027), or as soon as

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technically possible given the importance of mobile to the community and the public safety benefits. This date could be varied subject to market, technical and consumer readiness.

The UOMO is technology neutral with MNOs expected to use a mix of their current terrestrial mobile coverage (which already provides services to approximately 99 per cent of the population) and D2D technology delivered over Low Earth Orbit Satellite (LEOSat) platforms to ensure mobile coverage is reasonably available nationwide. Regardless of the technology used, MNOs will have obligations to provide reasonable and equitable access and the Minister will have the ability to set clear standards, rules and benchmarks to ensure appropriate delivery of services.

D2D provides an opportunity to deliver baseline mobile services – voice services and SMS – particularly in large uninhabited areas where it has never been commercially viable for the national mobile operators to supply terrestrial mobile services at scale. Satellite services have been available in Australia for many years, through satellite phones which typically required consumers to purchase dedicated handsets or sleeves and meet the additional costs of a standalone satellite mobile plan.

As was raised by many in the debate, the choice of mobile providers in regional Australia can be limited. The UOMO will improve competition and choice in regional and remote areas by requiring the three major mobile providers to provide reasonable national outdoor coverage. It also provides a signal to LEOSat operators that Australia wants them to invest in Australia.

## The Telecommunications Legislation Amendment (Universal Outdoor Mobile Obligation) Bill 2025

As outlined in the Explanatory Memorandum, there is one Schedule to the Bill, comprising two parts. The first part amends existing Part 2 of the *Telecommunications (Consumer Protection and Service Standards) Act 1999* (TCPSS Act) to establish the UOMO as part of the existing universal service regime. It establishes a flexible legislative framework to create a UOMO.

This includes the default designation of Optus, Telstra and TPG Telecom as primary universal outdoor mobile providers. They will be required to make designated mobile telecommunications services (SMS and voice) reasonably available outdoors in Australia.

### Reasonably available

The concept of reasonableness deals with situations where it may not be possible for an MNO to supply mobile coverage in a particular area. There could be several reasons for this, such as technical limitations, temporary interruptions to the availability of wholesale services, temporary outages and the capability of handsets and services available from the end-user's chosen plan. In this way, the UOMO will operate on a similar basis to the existing USO and the SIP regime, where the supply of services must be on reasonable request.

Consistent with the USO and SIP regimes, the Bill includes a power for the Minister to determine circumstances when it would not be reasonable to make mobile coverage available, or matters to which regard must, or must not, be had in determining whether mobile coverage is reasonably available outdoors. An objective of the UOMO is to increase overall mobile coverage within the current technical capabilities of mobile technology. The Australian Government's intention is that a requirements and circumstances instrument would be made after the passage of the Bill in conjunction with a legislative instrument relating to standards. Both instruments would follow consultation with stakeholders but be made before the default day. The requirement and circumstances instrument will recognise that there are some practical limitations on the capabilities of mobile services, whether provided over terrestrial or D2D networks.

The department consulted MNOs while developing the legislation and will also consult them on the proposed instruments. However, the department recognises that there will be some technical limitations on how mobile networks operate – for example, D2D services may not always be able to be delivered in all outdoor locations, because of heavy tree cover, or because there are minor but regular interruptions depending on the

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location of satellites overhead. Similarly, MNOs may not be able to supply mobile coverage if there are outages because of damage to, or repairs to, facilities used to supply mobile services. In this case, the government would expect MNOs to take measures to improve the resilience of networks, to rectify outages within clear timeframes and effectively manage scheduled maintenance. The standards, rules and benchmarks powers under the Bill provide a mechanism to set these requirements. The use of delegated legislation also allows flexibility as the capability of technology changes.

## **Outdoors**

While terrestrial mobile coverage can be delivered in a number of situations, including indoors or in vehicles or vessels, it is not always possible. There may be obstructions which interfere with mobile signals, including buildings and topography. With D2D, mobile services may sometimes be able to be received indoors or in a vehicle the department's understanding is that currently this is not consistently possible. As a result, the Bill focuses on 'outdoor' coverage and this is defined to exclude indoors, in a vehicle, aircraft or vessel, and underground or underwater. While the government expects D2D services may sometimes work in these situations, the coverage may be unreliable or intermittent, particularly early in the development of the technology. That said, the government expects that the coverage will often be available and would be provided by mobile network operators where possible.

The SIP regime provides separate protections to ensure access to high speed broadband services at premises. People regularly connect their mobile devices to their home broadband to support Wi-Fi calling and through this can generally access voice and SMS services indoors. Furthermore, Telstra is also required to supply fixed voice services to premises on reasonable request through the USO.

## **Terrestrial mobile coverage**

As noted above, MNOs are expected to use their existing terrestrial mobile networks as well as D2D platforms to deliver nationwide mobile coverage. The UOMO is not about replacing traditional mobile coverage with new technology. D2D platforms will complement existing networks, so that as much of Australia as possible has outdoor mobile coverage. It is a matter for MNOs to determine exactly how they comply with the UOMO, but D2D technology is expected to help provide a baseline mobile service for areas outside traditional mobile coverage and expand public safety connectivity.

Mobile network operators will continue to have incentives to grow and improve the capacity of their networks given community demand for more data intensive services, population and market growth and competition between MNOs.

## **LEOSat market**

The UOMO has signalled to LEOSat providers that Australia wants them to deliver D2D services in Australia. While Starlink is currently at the forefront of provision of D2D services in Australia the government expects that more than one LEOSat provider will deliver services in Australia.

D2D technology is evolving and the market is developing quickly, with new providers and partnerships being forged around the world. Starlink has partnerships in most developed markets delivering SMS services and some data applications (e.g. X, Strava, WhatsApp), for example, in the United States in partnership with T Mobile and in New Zealand in partnership with One NZ and Spark. AST SpaceMobile has a joint venture with Vodafone Group to provide wholesale D2D services in Europe, and is partnering with major MNOs in other markets, such as AT&T and Verizon in the United States, Rakuten in Japan, Bell and Telus in Canada. In New Zealand, AST is partnered with MNO 2Degrees, which has announced it will be establishing ground segment integration and testing over the next 12 months and aiming for a service before 2027. Lynk Global also has several partnerships with MNOs in Pacific island countries delivering intermittent messaging services.

AST SpaceMobile, in its submission on the draft UOMO legislation, indicated that following Federal Communications Commission approval for its Blue Bird 2 satellite network it will begin working with MNO partners in Australia. This deployment would bring a competitive satellite operator to Australia which mobile

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network operators could consider partnering with for UOMO services. Lynk Global (merging with OmniSpace which will provide S-Band spectrum ITU rights) is also planning to provide wholesale D2D services in Australia.

The D2D market is developing rapidly, and the UOMO has been designed to provide mobile network flexibility to determine the best way to deliver the obligation. Prior to the UOMO being announced all MNOs had announced an intention to partner with satellite providers, including undertaking testing. The Bill also recognises that mobile network operators will settle commercial arrangements to deliver on the obligation. It sets clear expectations to ensure that the benefits enabled by this significant technology should be as widely available as possible, as quickly as possible and provides safeguard mechanisms to ensure equitable and quality service.

## **Services and devices**

The Bill has been drafted to ensure that the baseline services, expected to be available in coming years, are reasonably available outdoors across Australia. As such, the mobile telecommunications services subject to the UOMO will be voice services and SMS, as terrestrial networks already support these services, and D2D networks are expected to support these services. The Minister has the ability to add new services, by legislative instrument, to the UOMO in the future, subject to technological and market developments. For example, the government could consider designating mobile data services, noting that D2D networks have limited capacity and are not generally expected to support high-speed data services.

Work is underway internationally and domestically on device compatibility for D2D services, including through software updates to older devices. Wholesale LEOSat providers are working with major handset manufacturers to expand the roster of compatible devices and LEOSat operators are undertaking real world device testing to ensure compatibility. During debate on the Bill, a number of speakers raised concerns about whether devices could continue to be used after the UOMO takes effect. Where consumers can use their current devices on terrestrial networks, this would be unchanged after the UOMO commences.

A limited range of devices can currently access D2D technology, but D2D is already available to many Australians and is helping people connect in areas outside existing terrestrial mobile coverage. Industry is working together to expand availability of D2D technology to a wide range of handsets. In December 2025, Telstra reported that there were more than 120,000 connections to its satellite to mobile service on average per day from across Australia. The UOMO seeks to ensure that the community can similarly benefit from new technology and have a choice of providers.

More broadly, the government expects Optus, Telstra, and TPG to provide transparent, accurate, and accessible information about D2D capabilities, to assist consumers to make informed decisions regarding their device purchases and connectivity options.

## **Delegated legislation**

The Bill creates a flexible framework which can be adjusted, by disallowable legislative ministerial instruments, as the market develops and satellite technology evolves. Once the Bill is enacted and the default day arrives, the UOMO will be a statutory requirement applying by default to the three existing national MNOs. To recognise the evolution of technology and future market changes, the Bill provides flexibility for new UOMO providers to be added in the future if other service providers are able to provide relevant services.

The Bill adopts a flexible approach where obligations are enlivened in line with market developments and specifies that at the default day of 1 December 2027 all three MNOs will be required to ensure that baseline mobile coverage is reasonably available outdoors throughout Australia. The default day is provided to ensure that MNOs undertake preparations to comply with the UOMO, while enabling flexibility to adjust this date by legislative instrument having regard to market developments. The Bill makes it clear that while the Minister may adjust the default day, this must follow consultation with the mobile operators and consideration of technical and market issues and the impact on consumers.

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The Minister is also able to split the UOMO into separate voice and SMS obligations, if this reflects the readiness of the market. As further discussed below, the Bill creates flexibility through use of delegated legislation to set standards, rules and benchmarks.

## Spectrum

As D2D capability develops, there are a range of technical spectrum matters that mobile network operators will need to work through, including interference management with other spectrum users. The ACMA has day-to-day responsibility for spectrum management in Australia and is working with industry to manage and help resolve these issues.

The majority of MNOs' spectrum licences, some of which will be used to deliver the UOMO, are due to expire between 2028 and 2032. This spectrum is currently used by mobile operators to deliver 4G and 5G mobile services across Australia but some of this spectrum will be used by mobile operators to deliver D2D in the future. The ACMA has released its preferred views on renewal of these expiring licences and consulted on updates to its proposed pricing and proposed application decision-making process for renewal applications.

The ACMA is progressing allocation of the 2 GHz band for Mobile Satellite Services and has recently completed a consultation on allocation design and technical matters. The UOMO may impact demand for this spectrum, as it could be used to deliver D2D services, including for the UOMO, as handset and satellite technology develop in the future.

In its draft Five-Year Spectrum Outlook 2026-31, ACMA noted it will progress work associated with the spectrum management aspects of implementing the UOMO, covering any necessary spectrum licensing, planning and allocation initiatives. The UOMO applies to Australia including all states and mainland territories, and the eligible external territories of Christmas Island and the Cocos (Keeling) Islands. ACMA's spectrum licensing framework does not extend to all external territories, and therefore MNOs do not currently hold spectrum licences that could be used to comply with the UOMO in Christmas Island and the Cocos (Keeling) Islands. However, as ACMA noted in its draft Five-Year Spectrum Outlook 2026-31, it is developing a work program in 2026-27 to examine how the provision of D2D services covered by the UOMO might work in the external territories that are not subject to spectrum licensing. It is expected this issue will be resolved prior to the default day.

The Bill also establishes the area in which MNOs will be expected to provide that mobile coverage. This is defined as Australia in general, with one specified exclusion (the Australian Radio Quiet Zone WA (ARQZWA) at Murchison in Western Australia, where terrestrial radiocommunications emissions are constrained to protect radioastronomy operations). ACMA is working proactively with MNOs, satellite operators, and the CSIRO, which has responsibility for radioastronomy services in the ARQZWA, to ensure coordination occurs between these spectrum users to manage potential interference.

## Triple Zero service requirements

The UOMO will expand baseline mobile coverage and support greater access to emergency services, particularly in regional and remote areas outside terrestrial mobile coverage, where no access to Triple Zero is currently possible outside of the home on standard mobile handsets.

While the UOMO provides the underlying baseline connectivity that can support Triple Zero access, the Bill does not explicitly reference access to Triple Zero as a requirement for the MNOs to meet the Bill's objectives. This is because there is a longstanding technology neutral requirement for providers of public mobile telecommunications services to provide equitable access to Triple Zero. This is governed by the rules set out in the *Telecommunications (Emergency Call Service) Determination 2019 (ECSD)*, made under Part 8 of the *Telecommunications (Consumer Protection and Service Standards) Act 1999*.

Voice services carried by providers of public mobile telecommunications services, through any technology, are currently captured by the ECSD. As voice services will need to be supplied outdoors to fulfil the UOMO, the ECSD will apply to services offered and supplied in compliance with the UOMO. Accordingly, this means the

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UOMO will support access to Triple Zero regardless of the technology used to supply public mobile telecommunications voice services to consumers.

## Temporary disaster roaming

From 1 December 2027 the UOMO will ensure access to outdoor SMS and voice services, which reflects the predicted capability of D2D technology at the default day. These are also the services needed most in an emergency.

Temporary Disaster Roaming (TDR) will complement the UOMO and would enable consumers, regardless of their mobile provider, to have mobile connectivity during emergencies provided there is sufficient coverage and capacity available on other mobile networks.

The department continues to work with the MNOs on a pathway for a TDR capability to be implemented and available for use for the 2026-27 high-risk weather season (starting 1 October 2026) and is exploring options to mandate TDR should the MNOs fail to deliver a TDR capability by 1 October 2026.

## Standards, Rules and Benchmarks

The Bill establishes powers for the Minister, by legislative instrument to determine standards, rules and benchmarks that MNOs must comply with in meeting the UOMO. The Bill outlines some matters that could be covered by instruments made under these provisions, including the terms and conditions of supply (including retail price), the reliability of services, quality of voice calls, performance of SMS, timeframes for rectifying faults, action to address congestion and information an MNO must give a customer. The list is deliberately not exhaustive, as it is important that the government can respond flexibly to any failure by MNOs to deliver quality or equitable services.

Similar powers already exist to create standards, rules and benchmarks for fixed broadband services under the SIP regime and for voice services through the long-standing Customer Service Guarantee. This power brings mobile into the existing standards framework the already exists for telecommunications services.

## Affordability

Affordability is a key issue raised in Parliamentary debate. While mobile services are provided on a commercial basis, the government's expectation is that MNOs will provide equitable access, including consideration of how best to support vulnerable consumers. Standards powers created by the Bill could deliver assistance in a targeted way, if industry does not provide appropriate products and services.

## Enforcement

The ACMA would be responsible for enforcing the UOMO, including in relation to any standards, rules or benchmarks that are applied to services. The ACMA already has this role in relation to existing universal service and SIP arrangements. The *Telecommunications Act 1997* provides it with powers to take enforcement action, including to investigate breaches, issue infringement notices, seek enforceable undertakings, issue formal warnings or take action in a court.