

NFF submission to Triple Zero service outage inquiry

November 2025



The National Farmers' Federation (NFF) is the voice of Australian farmers.

The NFF was established in 1979 as the national peak body representing farmers and more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

The NFF represents Australian agriculture on national and foreign policy issues including workplace relations, trade and natural resource management. Our members complement this work through the delivery of direct 'grass roots' member services as well as state-based policy and commodity-specific interests.

NFF Member Organisations













































































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Executive Summary

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission to the Triple Zero service outage inquiry (the Inquiry) of the Senate Standing Environment and Communications References Committee (the Committee). We acknowledge that this inquiry follows the serious Optus outage that left hundreds of Australians unable to contact emergency services and was later linked to several deaths, a stark reminder of the critical importance of reliable connectivity in times of crisis.

Connectivity services are of heightened importance for Australians living outside metropolitan areas. Regional, rural, and remote communities face persistent and unique challenges, particularly around service quality, reliability, and accessibility. These challenges are amplified by the nature of agricultural work, which often involves operating alone or in remote areas. In such circumstances, the ability to contact someone in an emergency, whether Triple Zero, a neighbour, or a family member, can be the difference between timely assistance and serious harm.

For many farmers and rural communities, poor connectivity means that having no reliable way to reach emergency services or assistance can be an everyday reality. This vulnerability is heightened in remote areas, during network outages (mobile and broadband), in blackspots, and in natural disasters, where having backup options and knowing how to use them can be the difference between life and death.

Practical solutions exist that would reduce these risks and strengthen safety for those living and working in rural Australia. The NFF implores the Committee to use this inquiry not only to address the serious risks exposed by major outages but also to tackle systemic connectivity shortfalls that compromise emergency service access, particularly in rural Australia.

Recommendations

The NFF urges the Inquiry to adopt three key recommendations from the 2024 Regional Telecommunications Review, conducted by the Regional Telecommunications Independent Review Committee (RTIRC), including to:

- 1. Prioritise funding to improve existing terrestrial mobile network capacity, service quality, and resilience, rather than further extending terrestrial coverage;
- 2. Continue funding new terrestrial mobile coverage for critical areas like roads, and leverage strategically located Wi-Fi hotspots where needed; and
- 3. Mandate, at the earliest opportunity, emergency mobile roaming during disasters and expedite the regulatory and operational framework for its use.

Furthermore, the NFF additionally recommends that the Committee should:

4. Ensure the Universal Outdoor Mobile Obligation (UOMO) delivers on its promise to enhance access to Triple Zero and emergency assistance across Australia by requiring Mobile Network Operators (MNOs) and Mobile Virtual Network Operators



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(MVNOs) to provide an affordable, reliable UOMO service to all Australians, linked to clear performance standards.

5. Fast-track the rollout of standardised mobile network coverage maps and significantly expand the National Audit of Mobile Coverage to give Australians confidence about where Triple Zero can, and cannot, be accessed.

Increased barriers to accessing emergency services in agriculture industry

While this Inquiry focuses on Triple Zero outages, the inability to contact emergency services is a far more frequent reality for individuals in regional, rural, and remote areas, even outside major outage events. Poor connectivity resulting in an inability to contact emergency services, or other emergency assistance, is an extremely concerning yet common feature of life for Australian farmers and communities outside metropolitan areas.

This vulnerability is compounded by several factors. Relevant to the Inquiry's terms of reference, in many rural areas, only one mobile network operator provides coverage, making camp-on arrangements ineffective during outages. In addition, redundancy (or alternate methods of contacting Triple Zero) is often lacking. For farmers working in geographically isolated areas, alternative methods of contacting Triple Zero, such as Voice over Internet Protocol (VoIP), are rarely available. Something as simple as returning from a distant paddock to a house with internet access can delay critical support. Connectivity failures during natural disasters and in blackspots further exacerbate these risks, leaving communities without lifelines when they need them most.

Given these realities, the NFF strongly recommends that the Inquiry support ongoing government programs that strengthen mobile network resilience and coverage in regional, rural and remote Australia. Initiatives such as the Mobile Network Hardening Program (MNHP), Strengthening Telecommunications Against Natural Disasters (STAND) program, Mobile Black Spot Program (MBSP), and the Regional Roads Australia Mobile Program (RRAMP) have delivered tangible improvements and must continue to be prioritised.

The following example illustrates the real-world consequences of connectivity blackspots.

Case study: The essential role of reliable connectivity for farming and family life

The below text is an extract from an interview with Mr Daniel Keam, grain farmer and GrainGrowers' National Policy Council member, from Warracknabeal, Victoria, as part of the NFF's response to the 2024 Regional Telecommunications Review.

In a wheatbelt town in rural Victoria, Daniel Keam faces a paradox that many city dwellers might find hard to grasp. From his kitchen window, he can see the phone tower. Yet, reliable connectivity remains a constant challenge. This modern lifeline, essential for his farm business and family, flickers unpredictably like a faltering beacon in the distance.



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"I can see the phone tower from home, less than a kilometre away. It's like someone is turning the dial up and down; one day we have really good reception and for the next two weeks we have just average reception," says Daniel.

Blackspots a matter of life and death

The importance of reliable connectivity becomes starkly evident in emergencies. Daniel recalls an incident at a local football match this year where a player was injured and the struggle to connect a triple zero call. Officials had to move away from the ground to find a signal, highlighting the concerning issue of connectivity blackspots even in the middle of town.

"They had to run off the oval to get any sort of reception. It was bizarre to have a black spot in the middle of a football ground. We were lucky there were a couple of nurses and off -duty ambulance personnel, but it could have been much worse." This scenario underscores a critical issue: the expectation of connectivity is not just a convenience but a necessity.

Daniel's full story is available here.

Recommendations

To address these challenges, the NFF urges the Committee to adopt the following recommendations, consistent with the 2024 Regional Telecommunications Review:

- 1. Prioritise funding to improve existing terrestrial mobile network capacity, service quality, and resilience, rather than further extending terrestrial coverage; and
- 2. Continue funding new terrestrial mobile coverage for critical areas like roads, and leverage strategically located Wi-Fi hotspots where needed.

Temporary Disaster Roaming

The NFF strongly supports the Inquiry's focus on the limitations preventing mobile customers from accessing services offered by alternate carriers during emergencies, known as mobile phone 'roaming'. This issue is particularly acute in regional communities where mobile coverage can be less reliable.

The NFF believes a temporary disaster roaming capability (TDR, roaming) in emergency situations is a common-sense initiative. No-one in an emergency should be left without potentially lifesaving communications due to not being a customer of a particular network.

While Triple Zero calls can – or should – connect across all networks, many critical communications during emergencies cannot. Distance and geography can make timely emergency services access difficult, impracticable or, in some instances, impossible. In this case, farmers and rural residents often need to coordinate with neighbours, receive warnings, or contact family members. A pertinent example of this is people in transit who are unexpectedly caught in an emergency situation, such as fire or flood, and require assistance. These interactions are essential for safety and survival, yet they are blocked when a person is tied to a single network that has failed.



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Further, in many natural disasters, emergency services have explicitly advised some regional communities that assistance will not be available during the peak of the event. This reality reinforces the importance of providing every possible means of communication in times of crisis. During bushfires, for example, resource constraints often mean local brigades cannot respond immediately, leaving neighbours to coordinate efforts to protect properties, assets, and lives. While UHF radios play an important role during these periods, they are typically installed only in work vehicles or, in some cases, as a base station in the main residence. As a result, mobile communications are often relied upon in conjunction with UHF, and additional methods of communication become critical when handheld radios do not suffice.

To ensure roaming arrangements meet real-world needs, text, voice, and data services should all be available during emergencies and natural disasters. This includes calls placed to Triple Zero via the National Relay Service, which require text or data capability.

When it comes to customer charges under a temporary roaming arrangement, the NFF does not advocate for Mobile Network Operators (MNOs) to bear the cost of servicing customers from other networks. Instead, appropriate cost-recovery mechanisms should be developed to ensure charges are fairly allocated and attributed to the correct carriers and customers if roaming is implemented during emergency periods. Ultimately, the principle is clear: no one should be left without potentially life-saving communications because they are not a customer of a particular network.

The following case study demonstrates the realities of connectivity failures during natural disasters and underscores the need for a temporary disaster roaming capability.

Case study: Staying connected in crisis

The following text is an extract from an interview with Ms Wendy Hick, cattle farmer and Chair of the Regional, Rural and Remote Communications Coalition, as part of the NFF's response to the 2024 Regional Telecommunications Review.

Wendy Hick can vividly recall the moment when connectivity was more than just a convenience – it was a lifeline.

"We were dealing with a severe flood, and communication was crucial to warn our neighbours downstream. It's very worrying when you can't get any messages out to let people know what's going on or even to let them know you're okay."

Living on a cattle station in remote Queensland, reliable connectivity is essential for business operations, safety, and keeping in touch with family, friends and community. However, this lifeline is often threatened by aging infrastructure, frequent outages and natural disasters. Through her advocacy and unwavering determination, Wendy highlights the urgent need for robust and resilient connectivity solutions in rural Australia.

Impact of natural disasters

Natural disasters, such as the severe flooding in March 2023, test the limits of rural connectivity. Wendy's station experienced over 500 millimetres of rain within 36 hours, inundating buildings and cutting off essential services.



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Despite these conditions, Wendy's satellite internet service, Sky Muster, proved surprisingly resilient, allowing her to maintain communication and coordinate safety measures.

"Even in the torrential rain, we found that for the most part, it blipped out a couple of times but not much," she explains.

However, the loss of the landline once the cable washed away highlighted the vulnerability of their communication infrastructure.

"I fully expected us to lose all connectivity. I've been in a situation here on the station once before. Our main concern was to let people know what was happening so they were aware and could prepare.

"We knew we'd be dealing with a lot of water but that lack of communications is a worry because you've always got to expect the unexpected and it's hard to let others know what's going on if you've got no connectivity.

"There are some properties and a community north of up here that do rely on that mobile tower for voice service, and this tower was out during the flooding. It was extremely frustrating and terrifying for them, particularly if there's families of people who haven't evacuated."

"Staying connected is staying safe. And that's something we can't afford to compromise on."

Wendy's full story is available here.

Recommendation

To address these challenges, the NFF urges the Committee to adopt the following recommendation, consistent with the 2024 Regional Telecommunications Review:

3. Mandate, at the earliest opportunity, emergency mobile roaming during disasters and expedite the regulatory and operational framework for its use.

Universal Outdoor Mobile Obligation (UOMO)

The NFF strongly supports the establishment of the Universal Outdoor Mobile Obligation (UOMO) as a foundational reform to modernise Australia's universal service framework. The importance of the 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. It also presents a critical opportunity to enshrine outdoor mobile coverage as a universal right, enabled by emerging technologies such as Low Earth Orbit Satellites (LEOSats) with direct to device (D2D) capabilities.

The introduction of LEOSats and D2D technology will create a seismic shift in Australia's telecommunications landscape. While these technologies remain nascent, they offer the potential to deliver far greater mobile coverage across Australia's vast landmass than terrestrial networks alone could achieve. While terrestrial networks will remain the primary and preferred mode of mobile connectivity in the short-to-medium term, the



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rollout of D2D technologies have the potential to dramatically improve access to Triple Zero and emergency assistance for rural Australians.

For this reason, the NFF believes that guaranteeing access to Triple Zero and emergency assistance must be a core capability of the UOMO, and this objective must be explicitly safeguarded in the legislative framework.

The Australian Government consulted on the draft legislation in October 2025. In our submission, the NFF expressed strong support for the Bill's technology-neutral design and the designation of Telstra, Optus, and TPG as the initial Primary Universal Outdoor Mobile Providers. We also welcomed the Bill's definitions of mobile coverage and outdoor usability, which provide important clarity and reinforce the principle of equitable service delivery.

However, the proposed legislative framework lacks detail on enforceable performance standards, with key requirements deferred to future ministerial determinations. The NFF recommended that the Australian Government embed access to Triple Zero and emergency assistance in the legislative framework, develop enforceable standards, rules and benchmarks before UOMO commencement, ensure affordability and clarify accessibility requirements. Without a strong and adequately prescriptive framework, the UOMO risks falling short of delivering enhanced access to Triple Zero and emergency assistance across Australia.

The NFF refers the Committee to consider the NFF's comprehensive submission to the Consultation on UOMO draft legislation October 2025, <u>available here.</u>

Recommendation

The NFF recommends that the Committee should:

4. Ensure the Universal Outdoor Mobile Obligation (UOMO) delivers on its promise to enhance access to Triple Zero and emergency assistance across Australia by requiring Mobile Network Operators (MNOs) and Mobile Virtual Network Operators (MVNOs) to provide an affordable, reliable UOMO service to all Australians, linked to clear performance standards.

Mobile Network Coverage Maps

Australians need certainty about where they can, and cannot, reach Triple Zero in an emergency. Currently, proprietary coverage maps provided by MNOs are unreliable and often inaccurate, leaving individuals with little confidence about whether they will have service when it matters most.

The NFF welcomes the recent decision by the Minister for Communications to direct the Australian Communications and Media Authority (ACMA) to require MNOs to provide consistent, standardised coverage maps. This reform is essential, but it must be implemented swiftly and supported by a significant expansion of the National Audit of Mobile Coverage. The National Audit already conducts drive testing across approximately 180,000 km of regional and rural roads annually and incorporates crowd-sourced data. These audits have repeatedly revealed widespread discrepancies between actual coverage and MNO-provided maps, highlighting the urgent need for transparency.



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Expanding the National Audit alongside the rollout of standardised maps will give Australians confidence about where mobile coverage is available, and where it is not, so they can plan for emergencies and know whether they can rely on Triple Zero access.

Recommendation

The NFF recommends that the Committee seeks to:

5. Fast-track the rollout of standardised mobile network coverage maps and significantly expand the National Audit of Mobile Coverage to give Australians confidence about where Triple Zero can, and cannot, be accessed.

Further information

The NFF refers the Committee to previous submissions on related matters, particularly the 2024 Regional Telecommunications Review. Our submission to the consultation on draft UOMO legislation is also highly relevant, as it addresses the legislative framework needed to guarantee emergency connectivity.

We also encourage the Committee to consider the perspectives of NFF member organisations and the Australian Communications Consumer Action Network (ACCAN), whose contributions provide valuable insights into consumer needs and systemic challenges.

Conclusion

The NFF thanks the Committee for the opportunity to make a submission to the Triple Zero service outage inquiry. The policy contact for this matter is Ms Charlotte Wundersitz

Yours sincerely,

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Leading Australian Agriculture

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