

7 April 2026

Senator Varun Ghosh  
Committee Chair  
Senate Standing Committee on Environment and Communications - Legislation Committee  
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Dear Senator Ghosh and Legislation Committee,

The National Rural Health Alliance (the Alliance) welcomes the opportunity to respond to the Senate Standing Committee on Environment and Communications - Legislation Committee Inquiry into the Telecommunications Legislation Amendment (Universal Outdoor Mobile Obligation) Bill 2025 (UOMO Bill 2025).

The Alliance is the peak body for regional, rural and remote (hereafter rural) health in Australia, comprising [56 member organisations](#) which include healthcare, disability and ageing professionals, service providers, health and medical educators and trainers, researchers, medical and health practitioner students, the Aboriginal and Torres Strait Islander health sector and organisations that deliver care for rural and remote Australians.

Our vision is for healthy and sustainable rural communities, which make up more than 7.4 million people residing outside our major cities, or approximately 30% of the Australian population. We are focused on advancing rural health reform to achieve equitable and flexible health funding and care access to that of urban per capita spending, and equitable healthcare access. In addition, that rural and remote Australians have the same health outcomes, as their post code should not determine how healthy they are.

**Rural Australia is the productive powerhouse for our nation.** The gross value of agricultural, fisheries and forestry production was \$ 88.3 billion in 2023-2024<sup>1</sup>, while over 90% of the food and drinks we consume are grown or made in rural Australia<sup>2</sup>. Nearly half of the nation's tourism expenditure (46%) or \$107 billion occurs in rural Australia<sup>3</sup>.

Furthermore, the rural resources and energy sector constitutes approximately 60% to over two-thirds of Australia's total export income. As of late 2025, it remains the primary driver of Australia's trade performance, with export earnings for 2025-26 **expected** to reach \$383 billion and is the nation's largest export industry<sup>4</sup>.

While these are benefits to all Australians from rural and remote communities, rural Australians continue to experience healthcare, disability and ageing access barriers, delayed care, increased hospitalisations, high travel and retrieval costs, fragmented service delivery, inflexible policy, and chronic underfunding. **These all contribute to poorer health outcomes, resulting in between 12 to 16 years earlier death for people in rural communities, compared to people living in cities.**

<sup>1</sup> Department of Agriculture, Fisheries and Forestry (2025), [Snapshot of Australian Agriculture 2025](#), Australian Bureau of Agriculture and Resources Economics and Sciences, Australian Government, accessed 16 January 2026.

<sup>2</sup> Australian Government Department of Agriculture, Fisheries and Forestry. Food [webpage]. (2023) [cited 3 Mar 26]. <https://www.agriculture.gov.au/agriculture-land/farm-food-drought/food>

<sup>3</sup> Australian Regional Tourism Ltd. About ART [webpage]. (2024) [cited 3 Mar 26]. Available from: <https://regionaltourism.com.au/>

<sup>4</sup> Department of Industry, Science and Resources [webpage]. (2025) [cited 5 Mar 26]. Australia's Resources and Energy Export Earnings Set to Remain at High Levels Despite Forecast Falls. Available from: <https://www.industry.gov.au/news/australias-resources-and-energy-export-earnings-set-remain-high-levels-despiteforecast-falls>

In applying a rural lens to this submission, the Alliance seeks to emphasise that **rural Australia underpins national prosperity and powers national economic and social output**. Indeed, as a western country, we have a social and economic responsibility for all Australians to have access to equitable care and services.

### Public safety reform welcome

The Alliance welcomes the introduction of the UOMO Bill 2025 which will require Telstra Limited, Optus Mobile Pty Limited and TPG Telecom Limited to deliver baseline outdoor coverage across Australia. As noted by the Explanatory Memorandum, this new underlying connectivity will help improve public safety and support greater access to emergency services and support. This is particularly critical in rural and remote areas outside terrestrial mobile coverage, where no access to Triple Zero is currently possible outside of the home on standard mobile handsets.

The Alliance also welcomes the Telecommunications Legislation Amendment (Triple Zero Custodian and Emergency Calling Powers) Bill 2025 to establish the Triple Zero Custodian “with the ability to request the Australian Communications and Media Authority to require information, or direct action, from carriers, carriage service providers and emergency call persons in relation to matters which affect the Emergency Call Service”<sup>5</sup>. However, more action needs to be taken.

Indeed, many rural communities are still grappling with unreliable mobile coverage and inadequate telecommunications infrastructure, and the higher costs that they are expected to carry, when people in cities are not.

Recent Triple Zero outages, which caused emergency calls to fail, and the dire consequences attributed to the outages, underscore the public safety imperative. **The UOMO must therefore complement recent reforms to strengthen Triple Zero reliability.**

To put this into perspective, 76 per cent of people who responded to the Australian Communications Consumer Action Network (ACCAN) Consumer Sentiment Tracker: Reliability Wave 3 stated that their mobile phone is the only way they have to contact Triple Zero<sup>6</sup>. Alarming, the ACCAN research also indicates that one in 10 consumers said that they or a member of their family could not contact Triple Zero from a mobile phone due to a mobile outage in the past 12 months.<sup>7</sup> The inability to access this emergency service is therefore a matter of life or death.

An example of a Triple Zero failure area that has been shared with the Alliance is Dundee Beach in the Northern Territory (approximately 130 kilometres from Darwin), which experiences a regular influx of visitors on weekends and holidays. Residents and visitors alike have experienced significant service failures, including the inability to dial Triple Zero.

### Health equity to underpin mobile outdoor coverage

As Australia continues to modernise digitisation in specific healthcare contexts, the issue of health, disability and ageing equity has extended to digital environments which are enabled through telecommunications services.

Reliable outdoor coverage is crucial in delivering health services and continuity of care to people living in rural areas, even with promises of satellite telephones being the solution, until weather or fires prevent coverage.

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<sup>5</sup> Telecommunications Legislation Amendment (Triple Zero Custodian and Emergency Calling Powers) Bill 2025. [https://www.aph.gov.au/Parliamentary\\_Business/Bills\\_Legislation/Bills\\_Search\\_Results/Result?bld=r7379](https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bld=r7379)

<sup>6</sup> ACCAN, 2026. *Consumer Sentiment Tracker: Reliability Wave 3*, March 2026.

<sup>7</sup> Ibid

Thus, regional telecommunication is an important enabler of equity in healthcare in rural Australia. These services and support include, but are not limited to:

- On the ground services, fly-in-fly-out, virtual care (including telehealth), outreach/mobile clinics and hybrid models of care
- Emergency response and retrieval coordination, including adequate support for cellular routers that send patient data (ECGs, vital signs) to hospitals in real time while en route
- Mental health apps and crisis lines
- Mobile-enabled medical devices and personal alerts
- Falls and aged care safety alerts
- Disability support tools

The Alliance notes that the UOMO Bill 2025 is silent on Aboriginal and Torres Strait Islander health contexts, such as cultural gatherings linked to wellbeing and community-led health programs. Telecommunications access remains a foundational equity issue for remote First Nations communities beyond Wi-Fi coverage in certain areas of their communities; it is not just a consumer technology issue.

As reliable connectivity is still a challenge for many First Nations communities, **mobile coverage gaps for this priority population will exacerbate existing health inequities.**

The Alliance recommends that **health equity underpin the UOMO Bill 2025.** Importantly, implementation of the UOMO should **prioritise communities with known emergency access and health service gaps and align with Closing the Gap commitments on digital inclusion and health access.**

### Affordability and digital inclusion in rural Australia

The Australian Digital Inclusion Index (ADII) 2025 highlights that **affordability scores are lower in areas outside major cities**, with around 21 per cent of households outside capital cities having to compromise on the speed and/or data allowance of their internet connections to afford them, compared with 18.7 per cent in capital cities. These rates are particularly high in remote (27.4 per cent) and very remote (37.1 per cent) areas. These gaps have significant implications, not only for individuals, but also for the broader social and economic development of non-metropolitan Australia.<sup>8</sup>

The findings are particularly relevant to mobile services. The ADII reports that 12.4 per cent of people living outside capital cities rely solely on mobile connectivity, making mobile services an essential utility rather than a discretionary service. In rural contexts, mobile coverage is often relied upon not only for communication, but for access to emergency services and telehealth (as noted previously), as well as government digital services, banking, and community/social connection.<sup>9</sup>

**Affordability pressures also intersect with vulnerability.** The ADII 2025 shows that digital exclusion remains disproportionately high among older Australians (66.5 per cent), people in the lowest income households (63 per cent), those who did not complete secondary school (54.5 per cent), and public housing residents (54.5 per cent)<sup>10</sup>—groups that are in high proportions in rural Australia.

While improved outdoor mobile coverage is essential for safety, emergency response and economic participation, expanded coverage alone will not deliver equitable outcomes **if services remain unaffordable for the communities most dependent on them.** Indeed, it would lead to a perverse outcome if the UOMO Bill 2025, which is intended to deliver universal outdoor coverage, were to inadvertently increase costs for consumers by pushing them to upgrade their devices or move to higher cost plans to access the coverage.

<sup>8</sup> Thomas, J. et al. *Measuring Australia's Digital Divide: 2025 Australian Digital Inclusion Index*. Melbourne: ARC Centre of Excellence for Automated Decision-Making and Society, RMIT University, Swinburne University of Technology, and Telstra.

<sup>9</sup> Ibid

<sup>10</sup> Ibid

Without affordability safeguards, improved outdoor coverage may fail to translate into real access for vulnerable groups, limiting the ability of the UOMO Bill 2025 to contribute to safety, inclusion and rural resilience. **Accordingly, affordability and digital inclusion must be treated as a core consideration in the design and implementation of the UOMO Bill 2025.**

The Committee should ensure that the legislation **sufficiently acknowledges and mitigates affordability risks, particularly for rural and remote users**, for example, by aligning the UOMO with broader national digital inclusion objectives.

### **“Reasonably Available” Must Be Appropriately Defined (sections 12F–12H)**

The Explanatory Memorandum notes that while terrestrial mobile coverage is widely available within populated areas, only around a third of the Australian landmass has coverage. The Alliance supports the intent of the UOMO Bill 2025 to ensure that baseline outdoor mobile coverage is “reasonably available outdoors to all people in Australia on an equitable basis”.

However, the concept of services being “reasonably available outdoors” relies heavily on key definitions being determined through future Ministerial instruments. Specifically, the UOMO Bill 2025 empowers the Minister to define when it is *not* reasonable to expect outdoor availability, acknowledging technical limits (dense canopy, outages, lack of compatible handset/plan).

The Alliance seeks to highlight that **“reasonable availability” in urban settings would not be equivalent to rural contexts** where people travel greater distances at personal cost to receive medical services, health services serve small populations across large geographical areas, often with limited workforce, and emergency events occur far from larger towns or highways.

In the Australian primary healthcare context, access to services is supported by digital health initiatives such as telehealth, electronic prescriptions, My Medicare and My Health Record, which all rely on good-quality mobile coverage. The ability to use and access telecommunications services, therefore, has a direct impact on the wellbeing of people living in rural areas, particularly where access is poor.

**Poor connectivity, in particular, limits telehealth effectiveness**, and without reliable telehealth, rural patients make unnecessary trips, miss appointments, or rely on higher-cost in-person or acute services. Importantly, clinicians cannot collaborate efficiently in virtual or multidisciplinary teams, or access digital health tools that support delivery of care, reducing workforce productivity in rural settings<sup>11</sup>.

The Alliance recommends **comprehensive consultations with rural health stakeholders in the development of the “reasonableness” instrument** so that it explicitly accounts for the rural contexts of outdoor coverage and cost, including but not limited to:

- Travel corridors between towns and service centres
- Areas of agricultural, mining, forestry and tourism activity
- Locations where health outreach, retrieval or emergency services operate, especially known flood/fire-prone zones
- Known black spots affecting Aboriginal communities, rural areas and outstations
- Areas with historic lack of robust telecommunications infrastructure and reliable coverage.

In relation to mobile black spots, the Alliance has received stakeholder feedback regarding some problem areas around Australia, including but not limited to:

- **The Kennedy Highway between Emerald Creek and Kuranda in Queensland**, a major freight, commuter and tourism corridor, as well as a rural residential growth area. It is also an extreme weather shelter that is inundated with residents and visitors who seek shelter during extreme weather events.

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<sup>11</sup> NRHA 2026. Submission to the Select Committee on Productivity in Australia. Available from

<https://www.ruralhealth.org.au/policy/nrha-response-to-the-select-committee-on-productivity-in-australia/>

- **The Mareeba Dimbulah Road between Piemonte and Lemonside Roads in Queensland**, also a regional road transport corridor with an agricultural area that would benefit greatly from mobile phone coverage to boost productivity and innovation. It includes a rural services precinct comprising a school, rural fire brigade, postal services and retail stores (petrol, café and groceries).

### **Standards and Benchmarks Must Reflect Health and Safety Needs (sections 12Q–12S)**

The Alliance also notes that the UOMO Bill 2025 allows the Minister to set standards and benchmarks for a designated telecommunications service, including reliability, quality of voice and SMS, fault repair timeframes, and congestion management.

Voice and SMS reliability are lifeline services in rural areas. Delays in fault repair have disproportionate impacts on rural practices often operated by solo practitioners, small hospitals, and remote clinics.

The Alliance requests that an **explicit statement be included in the first Ministerial instrument for standards/benchmarks setting out that the UOMO is a health and safety intervention**, with measures designed to reduce avoidable harm in rural and remote communities (e.g. in retrieval coordination, farm incidents, remote worksites, and long road corridors used to reach care).

Moreover, **emergency call reliability and outage resilience should be reflected in the standards or benchmarks**. As noted previously, the Tripe Zero outages caused harm to the public; therefore, lessons learned from these failures justify stronger performance requirements on Telstra Limited, Optus Mobile Pty Limited and TPG Telecom Limited. **An example of a service standard could be to specify maximum repair times when outages affect rural health and emergency services.**

It would be a wasted opportunity for holding these telecommunications providers to account, to deliver basic tenets of access in a timely manner and to higher standards and benchmarks. This is especially critical when there is already an underservice and security issue for many rural and remote Australians.

### **Conclusion**

The Alliance supports the UOMO as a necessary reform to improve equity of access to essential services. This is far more than just about convenience. For rural Australians, outdoor mobile coverage is a health and safety necessity, as well as a socio-economic driver.

The success measure of the UOMO when initially commenced, required Telstra, Optus Mobile and TPG Telecom to ensure that mobile coverage (voice and text services) is ‘reasonably available’ outdoors to all people in Australia on an ‘equitable basis’.

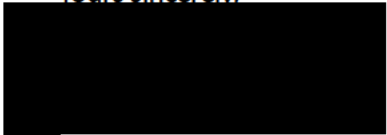
**It must however address the urban-rural affordability divide, and specify rural/remote and First Nations-appropriate definitions of “reasonable availability”. In addition, it must enforce strong accountability mechanisms and establish health-informed equity performance benchmarks and how these will be monitored and transparently be reported on.**

The current market driven model of deployment or building outward from urban and regional centres risks increasing existing digital inequalities. Indeed, where market fails or where there is no market, Government must step in and act on behalf of rural, remote and First Nations Australians.

Not to do so, makes us all a large part of the problem.

I thank you Senator Ghosh and Legislation Committee for the Inquiry and would be pleased to provide further information on any of the information contained in this submission if required.

Yours sincerely,

  
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