The Space Industry Association of Australia (SIAA)

Submission to the Parliamentary Inquiry: Telecommunications Legislation Amendment (Universal Outdoor Mobile Obligation) Bill 2025

EXECUTIVE SUMMARY

The Space Industry Association of Australia (SIAA) is the peak body for the Space sector in Australia. SIAA provides a collective voice on behalf of over 80 domestic and international member organisations with world-class capability across all aspects of Space activities. SIAA membership reflects a breadth and depth of capability, including launch and return providers, advanced manufacturing, downstream data and AI, enabling capabilities such as law firms, startups, SMEs, aerospace Primes and Australia's leading academic institutions.

The Space Industry Association of Australia (SIAA) supports the intent of the Universal Outdoor Mobile Obligation (UOMO), however we note that reliance on international systems for widespread and essential communications services raises a host of novel risks for Australia. SIAA nevertheless supports the intention to deliver equitable mobile connectivity across Australia and notes that this is particularly important for regional, rural, remote and First Nations communities. Direct to device is particularly relevant to a range of critical services including Triple Zero access, cell broadcast national emergency messaging, Public Safety Mobile Broadband (PSMB) as well as "peer to peer" messaging, voice and data services across the 70% of Australia's landmass which does not have terrestrial mobile coverage.

More than 375,000 Australians already rely on LEOSat services for essential connectivity[1] and Federal, State and Local Governments are increasingly reliant upon LEOSat services for primary connectivity and/or secondary resilience for critical services including emergency management[2].

SIAA agrees that satellite-based services are likely to offer the most realistic opportunity to achieve widespread connectivity given the very real limitations on delivery of terrestrial services across Australia's vast landmass with such low population density. LEOSats bring increased connectivity, enhanced resilience through disasters and emergencies, and important services for regional, rural, remote and First Nations Australians.

However, it is critical to understand this the Bill and the rapidly increasing reliance on satellite services also represent an unprecedented structural inflection point and risk in Australia's fundamental communications model. Widespread critical services have always been assured by provision on Australian networks controlled by Australian companies and therefore within the Australian legal and regulatory regime (generally Telstra/NBN for fixed line services and Australian Mobile Network Operators (MNOs) for mobile services). While other international satellite services have been important for niche applications, especially

[1] https://www.accc.gov.au/system/files/communications-market-report-2024-25.pdf
[2] https://www.abc.net.au/news/2025-08-29/emergency-services-in-outback-queensland-turn-to-starlink/105677234

remote workers, these have been niche services with specific applications rather than widespread essential communications services.

With the rise of LEOSat services, for the first time in Australia's history, widespread essential universal communications services and even a "retail" regulatory obligation for Australian companies to ensure direct to device capability are contemplated to be delivered via offshore, global satellite networks which are beyond Australia's legal and regulatory remit. This is a very significant departure from the longstanding and established model under which essential communications services are provided on Australian networks deployed and controlled by Australian companies which are therefore within Australia's legal and regulatory remit and ability to ensure services, including not only the communications regulatory framework, but also broader significant frameworks particularly Security of Critical Infrastructure ("SOCI").

This creates a complex and important equation which must be carefully considered. Global satellite constellations clearly offer rapid, scalable connectivity and improved resilience, but also introduce very material differences and risks.

The recent Independent Review of Security of Critical Infrastructure not only re-confirmed Space as a critical infrastructure sector in its own right, but more importantly identified only 2 SOCI sectors (banking/finance and space) as critical dependencies for every single other SOCI sector – healthcare/medical, water & sewerage, higher education, food and grocery, transport, banking and finance, communications, data processing/storage, energy and Defence:

Table 1: Dependencies between the critical infrastructure sectors in the SOCI Act

Sector	Primary dependencies	Secondary dependencies
Healthcare and Medical	Energy; Water/Sewerage; Communications; Transport; Data Processing	Banking/Finance; Higher Education; Food & Grocery; Defence; Space Technology
Water and Sewerage	Energy; Communications	Transport; Data Processing; Defence; Banking/Finance; Space Technology
Higher Education	Energy; Communications; Data Processing	Transport; Banking/Finance; Food & Grocery; Defence; Space Technology; Water/Sewerage
Food and Grocery	Transport; Communications; Energy	Banking/Finance; Data Processing; Water/Sewerage; Space Technology; Defence
Transport	Energy; Communications; Data Processing; Space Technology	Banking/Finance; Water/Sewerage; Defence; Food & Grocery
Banking and Finance	Communications; Energy; Data Processing	Transport; Space Technology; Defence; Water/Sewerage
Communications	Energy; Transport; Data Processing	Banking/Finance; Space Technology; Defence; Water/Sewerage
Space	Energy; Communications	Transport; Defence; Data Processing; Banking/Finance
Data Processing or Storage	Energy; Communications	Transport; Water/Sewerage; Banking/Finance; Defence; Space Technology
Energy	Transport; Communications; Data Processing	Banking/Finance; Defence; Water/Sewerage; Space Technology
Defence	Energy; Communications; Transport; Data Processing	Banking/Finance; Space Technology; Water/Sewerage; Food & Grocery; Higher Education

Direct to device services are "exactly what they say on the tin" – ie are capable of delivering services direct from/to LEOSats to devices including without the involvement of a domestic MNO/partner and/or without using terrestrial spectrum. Mobile Satellite chipsets, antennas and international spectrum bands are increasingly incorporated into devices. The major LEOSat providers have made no secret of their ultimate ambition to deliver widespread direct

to device services without domestic partners/spectrum. [3] This has very significant implications as it enables direct provision of services without the involvement of domestic MNOs or terrestrial spectrum, which are currently the only two levers that enable Australia to effectively regulate or influence these services.

This has many implications but the most immediate consideration for the purposes of the draft legislation is that domestic MNOs face the likelihood of needing to ensure direct to device services consistent with the UOMO legislation, but also face parallel competition from the same international LEOSat networks providing direct to device services directly to Australian devices, without the same regulatory requirements or costs of delivering services in Australia.

Extensive reliance on a wholly international solution (either direct to device or via a domestic MNO) also presents a significant and known underlying risks. There are several well-known examples of LEOSat networks choosing to withdraw services at their discretion.[4]

Most of Australia's peers are preparing and/or deploying significant sovereign satellite capability in order to provide assured access to citizens. Australia has a number of options to substantially reduce these risks by supporting integration of Australia's space capability to meet the UOMO requirements with the degree of certainty which essential communications services require, including incremental deployment of infrastructure and services across key elements of the value chain. There are many Australian and Australia-based companies which offer substantial capabilities:

- In ground segment, companies such as Av-Comm Space & Defence and Blacktree Technology have decades of experience delivering RF and UHF solutions services domestically and internationally for both civil and defence use cases while Capricorn Space offers flexible ground segment hosting and services and Quasar and EOS offer highly relevant capabilities;
- Satellite manufacturing capabilities including Inovor, Space Machines Company, Gilmour Space, Fleet Space, Skykraft, and Southern Cross Space;
- Advanced component manufacturers including GPC Electronics and Circuitwise;
- Australian companies with substantial heritage and experience in managing satellite systems (such as Optus, Nova Systems and LatConnect60); and
- a host of enabling capabilities with deep satellite and space experience including Deloitte, KBR, CGI, Delta Tango and Narada Consulting.

Australia should also explore partnering with international firms to deliver assured services in a secure manner (including eg Viasat, Lockheed Martin, and Northrop Grumman) and/or one or more of the like-minded middle power peers who are already deploying sovereign

[3] https://www.rcrwireless.com/20260304/5g/spacex-starlink-mobile
[4] https://apngbc.org.au/2026/starlink-pulls-satellite-service-out-of-png/ and https://www.rappler.com/world/musk-shutdown-starlink-satellite-ukraine-retook-territory-russia/

systems to meet very similar needs and concerns (including Canada which has invested C$2.5bn in the Telesat Lightspeed network).

RECOMMENDATIONS

UOMO presents very important questions for Australia's national interest, especially in times of shifting geopolitical relations and increased emphasis on securing supply chains for critical assets and capabilities.

Most importantly, Australia needs to understand and consider the trade-offs involved in increasing reliance on international offshore services for essential communications capability. While Australia can leverage established satellite communications networks owned and operated by our international partners and allies, assured access to these networks remains a key risk to supporting the ongoing connectivity of Australians. Consideration of a solution that leverages Australian capability and where possible ensures meaningful integration of this capability (either as part of the constellation itself or constellation supply chain and ground segment offering) will offer substantially increase security around ongoing access. SIAA offers 3 primary recommendations:

1) With the increasing reliance on international providers for satellite communications capability, Australia should consider mechanisms to ensure consistent application of end-to-end regulatory accountability across both domestic carriers and international satellite providers. This will ensure alignment with critical infrastructure requirements and that Australian carriers are not faced with a substantial regulatory asymmetry;

2) Regardless of whether and when the Bill is passed, the Australian Government needs to carefully review its space supply chain vulnerabilities and pursue opportunities to partner and/or build satellite capability which is sufficiently assured to enable provision of direct to device/Triple Zero/Cell Broadcast services to Australian subscribers.

3) As a minimum viable capability, deployment of a backstop network configured for direct to device/Triple Zero/Cell Broadcast/IoT Connectivity for critical infrastructure would offer Australia assured access to essential services while building satellite and space capability which ensures that Australia maximises its ability to replenish its critical supply chains as technology continues to rapidly mature.

SIAA also attaches the full Independent Review of SOCI and SIAA's Pre-Budget Submission which reiterates these considerations and outlines a strategic approach which would enable Australia to capture the benefits of space capability across a wide variety of critical areas including economic growth, resilience, national security and Defence.