



Submission

to the

**Consultation on Universal Outdoor Mobile Obligation (UOMO)
draft legislation**

from the

**Federal Council
of**

The Isolated Children's Parents' Association of Australia Inc.

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The Isolated Children's Parents' Association of Australia, ICPA (Aust), welcomes the opportunity to contribute to the Consultation on Universal Outdoor Mobile Obligation (UOMO) draft legislation providing feedback related specifically to communications needs of rural and remote education and geographically isolated students.

The Uomo must guarantee reliable and affordable connectivity.

ICPA (Aust) views the telecommunications Uomo as a positive step towards all Australians having accessible, reliable, cost-effective, resilient and quality connectivity outcomes, which is absolutely essential. Australians in regional, rural and remote areas will rely on the obligation to secure mobile coverage they have never had or have never been able to depend on.

ICPA (Aust) is a voluntary, apolitical, national parent organisation, which advocates on behalf of our members representing rural, remote and geographically isolated families. ICPA (Aust) advocates to ensure that children, whether from the outback, regional towns, or distant communities, have equitable access to education from early childhood through to trade and tertiary years. For over fifty years, the ICPA have worked to remove barriers that prevent rural, remote and geographically isolated students from receiving the same opportunities as their peers in larger centres.

Students whose family home is in rural and remote Australia and who are enrolled in Schools of Distance Education rely heavily on telecommunications to access daily lessons via both telephone and internet. Most would be in the 0.7% of the population that have no access to any mobile network, and the majority would also be in the 3% of the population that will rely on satellite to access the internet.

While the intent of the Uomo draft legislation is commendable, the current draft legislation falls short of delivering equitable outcomes for rural and remote families due to vague standards, uncertain timelines, and weak accountability mechanisms.

Key Shortcomings

1. Undefined Service Standards

- The draft legislation uses ambiguous terms such as “reasonably available outdoors” and “basic outdoor coverage” without defining key technical benchmarks. What level of signal strength, voice quality, latency, reliability or uptime counts as “reasonable”? What counts as “outdoor” (e.g. on verandas, shade, hillsides)?
- This ambiguity could lead to an inconsistent application across different regions. This leaves telcos free to meet minimal obligations without delivering meaningful service improvements. Without clear service-level guarantees, telcos could comply in form while delivering an unsatisfactory experience in practice.
- This ambiguity weakens enforcement and risks compliance, leaving consumers without enforceable rights to challenge subpar service.

Independent quality measures must be implemented. One option is to potentially expand the role of the National Audit of Mobile Coverage to include assessments of both terrestrial and satellite-delivered services

2. Heavy Reliance on Satellite and Direct-to-Device (D2D) Technology

- The draft legislation depends heavily on emerging satellite and D2D technologies, which are not yet widely available or compatible with most handsets, requiring costly upgrades for rural families. This creates uncertainty and risks delaying connectivity for those who need it most.

- The draft legislation assumes widespread deployment of Low Earth Orbit Satellites (LEOSats) and D2D capability without binding rollout timelines or performance guarantees.
- Satellite to mobile (STM) limitations, such as signal obstruction in heavily timbered areas or under structures, and potential disruptions due to satellite handoffs or adverse weather need to be recognised and planned for. The obligation should be developed with limitations in mind, while ensuring providers do not use known limitations as an excuse for failing to comply with the obligation. Terrestrial network coverage improvements should be prioritised for areas that will not receive a reliable STM signal.
- Ensure users on the 'edge of coverage', that is, customers on the fringe of terrestrial coverage, who experience unreliable service despite signal indicators, are guaranteed access to voice and SMS services. This may involve enhancing terrestrial networks or enabling automatic or manual switching to satellite services when terrestrial coverage is not usable.

While ICPA (Aust) welcomes the emergence of LEOSat technology, it is important that all available technologies are utilised to their optimal capabilities to establish an interconnected network of communications.

3. Risk to Terrestrial Infrastructure

- Without incentives, carriers may prioritise cheaper satellite compliance over maintaining physical infrastructure in fringe zones.
- The draft legislation provides little assurance that telcos will maintain or expand terrestrial networks, potentially encouraging reliance on satellites rather than investing in and maintaining ground-based infrastructure.
- Combined with limited enforcement powers, lack of affordability and no clear guarantees for across network roaming during disasters, the current framework risks leaving remote families behind, especially in fringe zones.
- Terrestrial networks must remain the primary pathway, and a solution for mobile connectivity must be and remain a priority.

ICPA (Aust) has continually expressed the need for the delivery of voice and voice over internet services to be in two different forms, independent of each other. Depending only on satellite service, no matter the type, is not good enough. It is paramount that the UOMO includes explicit provisions protecting and expanding existing terrestrial investment and mandating continued maintenance (for example, Mobile Black Spot Program and Mobile Network Hardening Program).

4. Lack of Guaranteed Data Services

- The first phase only ensures SMS and voice coverage, excluding guaranteed data services.
- This is a major gap for remote families relying on online schooling and telehealth.
- Delaying data provision means rural households may continue to suffer a wide digital divide even after UOMO implementation.
- Although it may not be feasible to offer D2D data services on a broadscale basis, traditional mobile data is and should be considered the baseline service in the UOMO legislation.

5. Weak Accountability and Enforcement

- Key terms are vague, so enforcement will depend heavily on regulatory guidance and interpretation.
- The draft legislation gives telcos flexibility in how they meet obligations, subject to "reasonable and equitable standards". This could allow underperformance in marginal areas.
- No independent auditing or community reporting mechanisms exist.

- Rural users, being fewer in number and more dispersed, may have less capacity to monitor, complain or push for redress.
- Weak penalties and sanctions risk non or minimal compliance in low profit territories.
- Ambiguity in “reasonable steps” allows telcos to meet minimal obligations without meaningful service improvement.
- The UOMO’s regulatory framework must incentivise compliance and enable effective enforcement, to hold providers accountable and protect consumer rights.

6. Affordability & Accessibility

- The draft focuses on coverage, not deeply on price. The legislation does not sufficiently address affordability, for example, handset subsidies, lower cost plans, caps on extra charges in remote zones or data affordability, key barriers in remote regions.
- The draft legislation needs to address affordability challenges that may prevent individuals from accessing basic connectivity by considering the costs associated with service offerings, necessary devices, or technology upgrades required for STM compatibility.
- The cost of delivering the UOMO must not simply be passed on to rural, regional and remote consumers.

7. Disaster and Emergency Connectivity

- The draft does not commit to, and fails to guarantee, cross-network emergency roaming or priority access across other operators’ infrastructure during disasters, a critical safety gap.
- The UOMO should guarantee connectivity in emergencies.

8. Unclear timelines

- The draft phases in obligations as the market evolves and relies on voluntary or cooperative industry investment.
- Rural users may face years of lag. The dynamism of the rollout is reactive rather than guaranteed.
- Many rural families have already waited decades for fair connectivity.

9. Implementation Risks

- Without amendments, the UOMO risks becoming a “tick-box” measure that does not deliver meaningful change.
- Overreliance on immature technology, unclear benchmarks, and lack of rural-specific provisions could deepen the digital divide instead of closing it.

Conclusion

Rural and remote Australians deserve equal access to reliable, affordable and resilient mobile connectivity. The UOMO is a step in the right direction, but only if strengthened with enforceable standards, equitable technology transitions and affordability safeguards. Otherwise, the promise of “universal access” will remain more aspirational than real.

To succeed, the UOMO must be strengthened through clear performance standards, enforceable timelines, independent auditing, affordability measures and explicit protection for terrestrial infrastructure. Only then can it deliver on its promise of universal access “with no Australian left behind”.

In essence, rural and remote Australians do not just need coverage, they need coverage that is reliable, affordable and resilient. The UOMO is a step forward but without stronger definitions, safeguards and funding support, it will remain a missed opportunity to bridge Australia’s digital divide.

Telecommunications are essential to any modern economy, however for far too long people that live, work and are educated in geographically isolated locations have had to put up with a less than equitable situation with regard to their telecommunication access and this has been a core part of ICPA (Aust) advocacy for many years.