



## STATEMENT OF EXPECTATIONS UNIVERSAL OUTDOOR MOBILE OBLIGATION

Date: 12 August 2025

### INTRODUCTION

The National Farmers' Federation (NFF) welcomes the Australian Government's commitment to introducing the Universal Outdoor Mobile Obligation (UOMO) in 2025, a landmark policy with the potential to transform rural connectivity. The obligation, enabled by advancements in Low Earth Orbit (LEO) satellites and Satellite to Mobile (STM) technology, promises to extend and safeguard access to basic mobile voice and SMS services across Australia. Importantly, the obligation is expected to be implemented for outdoor SMS and voice by late 2027.

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.

The NFF and its members would welcome the opportunity to work with the Australian Government to ensure the Uomo delivers tangible benefits to rural communities.

### POLICY PRINCIPLES

As adopted in the NFF's Connectivity and Digital Agriculture Policy Statement (2022), the following principles are essential:

- **Universal access:** All Australians must have accessible, reliable, cost-effective, resilient and quality connectivity outcomes.
- **Pro-competitive environment:** Policy and regulatory settings should support a pro-competitive regional connectivity market that fosters continual service competition and innovation in order to deliver connectivity outcomes.
- **Targeted intervention:** Appropriate regulatory intervention and public investment remains required to ensure the delivery of connectivity outcomes to all Australians in the absence of any market-led solutions.
- **Safety during disasters:** Connectivity services are critical to the safety of all Australians during and after periods of natural disasters.
- **Connectivity literacy:** Connectivity literacy is an integral element of ensuring all Australians can effectively access and utilise connectivity services, and fully participate in the digital economy, including AgTech adoption.
- **Adaptive policy framework:** The rapidly and ever-changing nature of the regional connectivity environment necessitates ongoing review of contemporary policy, market and technology settings.

## OBJECTIVES

The NFF believes the UOMO should:

- enhance access to Triple Zero and emergency assistance across Australia;
- support outdoor voice and SMS coverage in current mobile black spots;
- improve network resilience, particularly during disasters and power outages;
- deliver accessible, reliable, cost-effective, resilient and quality connectivity outcomes; and
- complement but not replace existing connectivity infrastructure including the terrestrial network.

## KEY CONSIDERATIONS

To ensure the UOMO meets its intended goals, the NFF urges the Australian Government to address the following considerations.

### 1. Network Resilience

- **Terrestrial network investment:** Continue strong government and industry investment to improve terrestrial mobile coverage and capacity. Terrestrial networks remain the primary pathway and superior solution for mobile connectivity, and must be a priority.
- **Implementation of Regional Telecommunications Review 2024:** Implement recommendations from the 2024 Regional Telecommunications Review to support the UOMO, by addressing systemic issues affecting rural connectivity. This includes independent oversight for technology transitions and the development of a Regional Connectivity Strategy.

### 2. Quality and Performance

- **Define ‘basic mobile services’ and performance benchmarks:** Clearly define what is included under the UOMO – e.g. Triple Zero, SMS, voice – and collaborate with stakeholders to establish performance standards. This is essential to provide certainty and reliability for consumers.
- **Quality assurance:** Implement independent quality assurance measures, potentially expanding the role of the National Audit of Mobile Coverage to include assessments of both terrestrial and satellite-delivered services.

### 3. Accessibility

- **Signal availability:** Recognise and plan for the limitations of STM technology, such as signal obstruction in heavily timbered areas or under structures, and potential disruptions due to satellite handoffs or adverse weather. 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 which will not receive reliable STM signal.

- **Users on the ‘edge of coverage’:** Ensure that 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.
- **Connectivity literacy:** Invest in independent and effective communication strategies to educate consumers about the capabilities and limitations of LEO satellite technology, ensuring informed usage. The Regional Tech Hub should support and/or assist to implement said strategies.

#### 4. Affordability

- **Cost barriers:** Address affordability challenges that may prevent individuals or businesses from accessing basic connectivity. Consider the costs associated with service offerings, necessary devices, or technology upgrades required for STM compatibility.
- **Cost of regulation:** The cost of delivering the UOMO must not simply be passed on to rural, regional, and remote consumers.

#### 5. Accountability and Enforcement

- **Regulatory mechanisms:** Ensure the UOMO’s regulatory framework incentivises compliance and enables effective enforcement, to hold providers accountable and protect consumer rights.
- **Sovereign risks:** Be vigilant of, and mitigate where possible, the sovereign risks associated with foreign-owned LEO satellite constellations, including data security and enforcement challenges, even when Australia-based gateways are present.

#### 6. Competition

- **Market dynamics:** Engage with industry to identify incentives and remove barriers to promote public interest objectives and competitive outcomes in the regional connectivity market. This includes promoting competition between both the Mobile Network Operators and LEO satellite providers.

#### 7. Future Considerations

- **Technology evolution:** Monitor advancements in satellite technology and consider the inclusion of basic mobile data services in the UOMO as capabilities expand.
- **Adaptive framework:** Ensure the UOMO framework remains flexible to adapt to emerging technologies and changing market conditions.

#### 8. Ongoing review

- **Continuous Improvement:** Recognise the rapidly evolving nature of regional connectivity and commit to regular reviews of policy, market, and technology settings. Ongoing industry involvement will be integral.
- **Evaluation mechanisms:** Utilise the Regional Telecommunications Review or an equivalent process to assess the adequacy of the UOMO for regional, rural, and remote Australians.

## CONCLUSION

The NFF strongly supports the Australian Government's implementation of the UOMO. By addressing the considerations outlined above, the UOMO can deliver on its promise to provide essential mobile services to all Australians, regardless of location. The NFF remains committed to working collaboratively with the Australian Government and industry stakeholders to ensure the successful realisation of the UOMO's objectives.