

**National
Farmers
Federation**

**NFF submission to Proposal to
make the Telecommunications
(Mobile Network Coverage
Maps) Standard 2026**

February 2026



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



Contents

Executive Summary	4
Introduction	5
Approaches to coverage mapping	5
Coverage mapping requirements	6
Technical requirements	7
Other considerations	8
Conclusion	9

Executive Summary

The National Farmers' Federation (NFF) welcomes the opportunity to respond to the Australian Communications and Media Authority's (ACMA's) consultation on the proposed *Telecommunications (Mobile Network Coverage Maps) Standard 2026* (the Standard). We support the Minister's direction to standardise coverage maps, recognising the value this reform delivers in improving transparency and enabling informed consumer decision-making.

Standardised coverage maps will have their greatest impact in rural Australia, where users live, work and travel with variable mobile coverage. Implementation is critical; farmers will depend on these maps not only to choose the best provider for their location, but also to plan complementary connectivity solutions, manage operational risks and conduct business safely and efficiently in areas with inconsistent coverage levels.

The NFF seeks to ensure the Standard reflects the way farmers use coverage maps, secure coverage maps that are as accurate, reliable and practically useful as possible for rural, regional and remote Australians, and promote a framework that supports ongoing improvement.

To achieve this, the NFF recommends:

1. Mobile Network Operators (MNOs) facilitate consumer feedback on coverage performance and use this information to refine and improve predictive mapping over time.
2. Strengthening and expanding the National Audit of Mobile Coverage, including:
 - extending measurement beyond on-road areas to include agricultural properties and significant off-road locations; and
 - enabling opt-in participation for crowd-sourced data to improve the breadth and validity of rural measurements.
3. Streamlining, integrating or co-presenting predictive maps and measured data, so that consumers can access a unified, easily interpretable view of coverage.
4. The ACMA ensures that coverage labels and descriptions:
 - reflect the likely user experience with as much accuracy as practicable; and
 - better account for scenarios where a signal is present but not usable in practice.
5. Providers be required to incorporate direct-to-device (D2D) coverage in coverage maps, at such time as D2D coverage information is practically available.
6. In regard to technical requirements, the ACMA gives appropriate weight to usability of coverage, alignment with the National Audit of Mobile Coverage, verification and review mechanisms.
7. The ACMA adopts a consumer-centric approach by ensuring the Standard guarantees the continuous improvement of coverage maps.

8. The ACMA retains flexibility in the Standard to require more frequent updates where material network changes occur or where predictable seasonal pressures warrant up to date information.

Introduction

The National Farmers' Federation (NFF) welcomes the opportunity to respond to the Australian Communications and Media Authority's (ACMA's) consultation on the proposed *Telecommunications (Mobile Network Coverage Maps) Standard 2026* (the Standard). We support the Minister's direction to standardise coverage maps, recognising the value this reform delivers in improving transparency and enabling informed consumer decision-making.

Mobile connectivity is critical to safety, productivity and sustainability outcomes across rural, regional and remote Australia. Most rural Australians operate businesses and manage daily life while navigating variable coverage, switching between 4G and 5G, managing marginal or intermittent service, and at times contending with no coverage. Reliable information about where services are expected to work is therefore a core enabler of safe operations, effective communication and modern agricultural practice.

Standardised coverage maps will have their greatest impact in rural Australia, where users live, work and travel with variable mobile coverage. Implementation is critical; farmers will depend on these maps not only to choose the best provider for their location, but also to plan complementary connectivity solutions, manage operational risks and conduct business safely and efficiently in areas with differing coverage levels.

The NFF seeks to:

- **Ensure the Standard reflects the way farmers use coverage maps** including both when choosing a mobile network provider and in navigating day-to-day operations across properties, towns, and freight routes with highly variable coverage.
- **Secure coverage maps that are as accurate, reliable and practically useful as possible** for rural, regional and remote Australians, with clear descriptions that reflect real-world experience and support informed decisions about safety, business needs and connectivity solutions.
- **Promote a framework that supports ongoing improvement**, including integration of verified performance data (through the National Audit of Mobile Coverage) and future incorporation of emerging technologies like low-earth orbit satellites (LEOSats) with direct-to-device (D2D) capabilities.

Approaches to coverage mapping

The NFF notes the ACMA's proposal to use predictive modelling as the basis for standardised maps. We recognise that predictive modelling supports comparability, something consumers have not previously had, and that it provides a practical and scalable basis for generating standardised coverage maps.

For rural users, coverage maps are not only a tool for selecting a mobile network provider but used on an ongoing basis to understand where coverage is likely across their property,

community and supply routes. Comparability is important and will assist consumers to make more informed decisions about their mobile network provider, device requirements and plan; however, accuracy and reliability are equally critical if standardised coverage maps are to be genuinely useful for rural users.

Over the past 18-24 months particularly, farmers have consistently reported that their lived experience does not align with the coverage that providers claim should be available at specific locations. Hence, the limitations of predictive modelling, including the variability in both coverage and user experience and the correlation between modelled metrics and on the ground user experience, are of serious concern to the NFF and members. Maps are only as useful as they are trusted, and this requires reasonable accuracy. Providers should enable consumer feedback on coverage performance and use this information to refine and improve predictive mapping over time.

Best practice pairs modelling with independent verification. In Australia, the National Audit of Mobile Coverage (National Audit) is the natural mechanism to ground-truth modelled outputs. The limitations of predictive modelling undoubtedly heighten the importance of the National Audit for consumers.

However, expecting consumers to independently reconcile different methodologies and visualisations risks undermining the very transparency and usability the Standard aims to achieve. That is, the average rural consumer is unlikely to have the connectivity literacy or time required to compare or overlay two separate mapping tools presented on different platforms. To reduce burden on consumers, the ACMA, Australian Government and industry should seek to streamline or co-present predictive (standardised maps) and measured (National Audit) datasets so users can access a fulsome view of likely coverage.

The NFF recommends:

1. Mobile Network Operators (MNOs) enable consumer feedback on coverage performance and use this information to refine and improve predictive mapping over time.
2. Strengthening and expanding the National Audit of Mobile Coverage, including:
 - extending measurement beyond on-road areas to include agricultural properties and significant off-road locations; and
 - enabling opt-in participation for crowd-sourced data to improve the breadth and validity of rural measurements.
3. Streamlining, integrating or co-presenting predictive maps and measured data, so that consumers can access a unified, easily interpretable view of coverage.

Coverage mapping requirements

What are your views about the proposed coverage levels and their meaning? Are 4 levels adequate for enhancing consumer understanding of coverage?

The NFF strongly supports the ACMA's decision to adopt a more nuanced framework than a simple "coverage/no coverage" distinction. For rural users, finer granularity is essential for understanding expected coverage availability.

To be meaningful for consumers, labels and descriptions must reflect the likely user experience with as much accuracy as practicable. Each description should state, in sufficiently detailed terms, what users can and cannot expect to do at that level (e.g. voice call, SMS, data access). Where practicable, descriptions should clarify ambiguous terms like ‘reduced reliability’ and ‘variable performance’. This could be done by including an indicative level of confidence (e.g. proportion of time expected). Also, further consideration should be given to how the categories address likely indoor and in-vehicle coverage. In the absence of precise data or description, rural consumers will still need to infer likely indoor and in-vehicle performance from outdoor predictions.

As proposed, it is unclear how coverage levels would account for scenarios where a signal is present but not usable in practice. This scenario, commonly reported by NFF members, can have significant implications for safety and business continuity. The categories should consider how to recognise the complete bounds of mobile coverage while preventing providers from overstating expectations.

As the technology evolves, the NFF supports requiring providers to incorporate D2D availability into coverage maps as soon as practicable to reflect material improvements in baseline connectivity for rural Australians. We note the National Audit of Mobile Coverage also intends to consider D2D coverage in the near future. D2D coverage should be appropriately distinguished from terrestrial coverage if shown on the same map.

The NFF recommends:

4. That the ACMA ensures coverage labels and descriptions:
 - reflect the likely user experience with as much accuracy as practicable; and
 - better account for scenarios where a signal is present but not usable in practice.
5. Providers be required to incorporate D2D coverage in coverage maps, at such time as D2D coverage information is practically available.

Are there additional assumptions or limitations, beyond what is proposed, that should be disclosed to consumers? Should there be flexibility around the publication of the relevant descriptions and caveats?

As discussed above, in the absence of precise data, rural consumers will inevitably infer likely indoor and in-vehicle performance from outdoor predictions. This heightens the need for accurate, prominent and consistent caveats across all providers to ensure expectations are properly informed. While flexibility should allow MNOs to include additional caveats where they genuinely enhance clarity, it must not extend to diluting or modifying the mandated baseline information.

In addition, each MNO should clearly state any assumptions regarding the equipment or specific device required to achieve the predicted coverage, so consumers understand the practical conditions under which those predictions apply.

Technical requirements

Is there a case for permitting MNOs limited flexibility to adopt a coverage threshold other than -115 dBm, within strict bounds?

The NFF does not have a technical preference regarding the specific RSRP/SS-RSRP threshold values. Rather, we seek to ensure that any adopted thresholds – whether fixed at -115 dBm or varied within narrow bounds – faithfully represent the on-ground experience described for each coverage category.

In considering threshold requirements, we note:

- **Usability below –115 dBm:** Usable service may be possible below –115 dBm (e.g., voice, SMS, or very low-speed data), albeit with reduced reliability. Coverage labels should set realistic expectations.
- **Alignment with National Audit is common sense:** Sensible alignment with the National Audit of Mobile Coverage would improve coherence between modelled data and independently measured outcomes.
- **Verification:** Thresholds should be tested against user-experience evidence (from MNOs and/or the National Audit) to validate correlation with the user outcomes implied by each level (e.g. call set-up/hold, SMS success, basic data access). Where gaps emerge, thresholds or descriptors should be adjusted.
- **Review mechanism:** The ACMA should establish a periodic review to assess coverage map accuracy and the effectiveness of thresholds, methodology and assumptions. This will promote a framework of continuous improvement and ensure any unintended outcomes are promptly mitigated.

The NFF recommends:

6. In regard to technical requirements, the ACMA gives appropriate weight to usability of coverage, alignment with the National Audit of Mobile Coverage, verification and review mechanisms.
7. The ACMA adopts a consumer-centric approach by ensuring the Standard guarantees the continuous improvement of coverage maps.

Other considerations

The draft Standard requires that maps be updated at a minimum on a quarterly basis. Should an alternative update interval be considered? If so, what interval would be suitable, and for what reasons?

The NFF supports quarterly updates as a minimum to maintain accuracy and utility. The ACMA should retain flexibility for more frequent updates where material network changes occur or where predictable seasonal pressures, such as holiday travel, natural disaster seasons, and peak agricultural periods such as harvest, justify additional accuracy to manage elevated safety and operational risks. Alternatively, map users should be able to access or compare historic maps to view such seasonal variation.

The NFF recommends that:

8. The ACMA retains flexibility in the Standard to require more frequent updates where material network changes occur or where predictable seasonal pressures warrant up to date information.

Conclusion

The NFF supports the establishment of a standardised, transparent and consumer-focused approach to mobile coverage mapping. For rural, regional and remote Australians, reliable and accurate coverage information is essential to safety, productivity and daily operations. We therefore encourage the ACMA to continue refining the Standard through robust verification processes, close attention to real-world performance, and active collaboration with industry and the National Audit of Mobile Coverage.

The NFF would also like to note its support of the submission from the Australian Communications Consumer Action Network on this matter.

As custodian of the Standard, the ACMA will play an ongoing role in ensuring MNO compliance and in maintaining coverage maps that provide the transparency, comparability and accuracy consumers rely on.

The NFF thanks the ACMA for the opportunity to provide feedback on the proposal, and looks forward to continued engagement as this work progresses.

The policy contact for this matter is Ms Charlotte Wundersitz, General Manager of Rural Affairs, via email: cwundersitz@nff.org.au



National
Farmers
Federation

Leading
Australian
Agriculture

NFF House
14-16 Brisbane Avenue
Barton ACT 2600

Locked Bag 9
Kingston ACT 2604

(02) 6269 5666
reception@nff.org.au
nff.org.au
