



30 June 2026

Triple Zero Custodian
Department of Infrastructure, Transport, Regional Development, Communications,
Sport and the Arts

Via email: TripleZeroCustodian@infrastructure.gov.au

Dear Triple Zero Custodian,

RE: Triple Zero Legislative and Regulatory Review

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission to the Triple Zero Custodian (the Custodian) regarding the Triple Zero Legislative and Regulatory Review (the review).

We acknowledge that this review follows the serious Optus outage in September 2025 that left hundreds of Australians unable to contact emergency services and was later linked to several deaths, a stark reminder of the critical importance of reliable connectivity in times of crisis. The NFF notes that this review does not occur in isolation, but follows the 2023 Optus Outage Review and the Triple Zero service outage inquiry of the Senate Standing Environment and Communications References Committee, as well as broader telecommunications reviews such as the 2024 Regional Telecommunications Review and consultations into the Universal Outdoor Mobile Obligation Legislation. This NFF submission should be read alongside prior NFF submissions to those consultations.

Connectivity services are of heightened importance for Australians living outside metropolitan areas. Regional, rural, and remote communities face persistent and unique challenges, particularly around service quality, reliability, and accessibility. These challenges are amplified by the nature of agricultural work, which often involves operating alone or in remote areas. In such circumstances, the ability to contact someone in an emergency, whether Triple Zero, a neighbour, or a family member, can be the difference between timely assistance and serious harm.

For many farmers and rural communities, poor connectivity means that having no reliable way to reach emergency services or assistance can be an everyday reality. This vulnerability is heightened in remote areas, during network outages (mobile and broadband), in blackspots, and in natural disasters, where having backup options and knowing how to use them can be the difference between life and death. Practical solutions exist that would reduce these risks and strengthen safety for those living and working in rural Australia.

While noting the terms of reference of this review, it is important to acknowledge not only the serious risks exposed by major outages but also the systemic connectivity shortfalls that compromise emergency service access, particularly in rural Australia.

In many rural areas, only one mobile network operator provides coverage, making camp-on arrangements ineffective during outages. In addition, redundancy (or alternate methods of contacting Triple Zero) is often lacking. For farmers working in geographically isolated areas, alternative methods of contacting Triple Zero, such as Voice over Internet Protocol (VoIP), are rarely available. Something as simple as returning from a distant paddock to a house with internet access can delay critical support. Connectivity failures during natural disasters and in blackspots further exacerbate these risks, leaving communities without lifelines when they need them most.

To address these problems, and to strengthen access to Triple Zero, the NFF strongly supports ongoing government programs that strengthen mobile network resilience and coverage in regional, rural and remote Australia. Initiatives such as the Mobile Network Hardening Program (MNHP), Strengthening Telecommunications Against Natural Disasters (STAND) program, Mobile Black Spot Program (MBSP), and the Regional Roads Australia Mobile Program (RRAMP) have delivered tangible improvements and must continue to be prioritised.

Access to Triple Zero

The ability to connect to Triple Zero is a crucial public good and must remain as accessible and equitable as possible.

The NFF's core connectivity principle is that all Australians must have accessible, reliable, cost-effective, resilient and quality connectivity outcomes. This is particularly relevant to accessing Triple Zero.

The NFF recognises the rapid technological changes shifting the landscape of Triple Zero access, including the current predominance of mobile phones over fixed-line services, and new technologies such as smart watches and satellite-enabled emergency messaging.

The NFF believes that Triple Zero should be as reliably accessible as possible through as many technologies as are publicly available. That is, we urge the review to consider how best to adapt Triple Zero capabilities, legislation, and regulation to effectively include these new technologies. These technologies can provide redundancy when one mode of accessing Triple Zero fails, which is particularly important for farmers who often work alone or in remote areas.

Of particular note is the current inability to text 000. In some cases, users in – particularly in fringe coverage areas – have experienced repeated dropouts when attempting to call Triple Zero. In these scenarios, and in other cases whereby voice calling is not practical, the ability to text Triple Zero could be life-saving.

The NFF supports a regulative environment that is sufficiently flexible to adopt emerging technologies. Equally, clear public information must be developed to provide certainty to end users.

The Universal Outdoor Mobile Obligation

The NFF strongly supports the establishment of the Universal Outdoor Mobile Obligation (UOMO) as a foundational reform to modernise Australia's universal service framework. 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. It also presents a critical opportunity to enshrine outdoor mobile coverage as a universal right, enabled by emerging technologies such as Low Earth Orbit Satellites (LEOSats) with direct to device (D2D) capabilities.

The introduction of LEOSats and D2D technology will create a seismic shift in Australia's telecommunications landscape. While these technologies remain nascent, they offer the potential to deliver far greater mobile coverage across Australia's vast landmass than terrestrial networks alone could achieve. While terrestrial networks will remain the primary and preferred mode of mobile connectivity in the short-to-medium term, the rollout of D2D technologies have the potential to dramatically improve access to Triple Zero and emergency assistance for rural Australians. For this reason, the NFF believes that guaranteeing access to Triple Zero and emergency assistance must be a core capability of the UOMO, and this objective must be explicitly safeguarded in the legislative framework.

The proposed legislative framework currently lacks detail on enforceable performance standards, with key requirements deferred to future ministerial determinations. The NFF recommends that the Australian Government embed access to Triple Zero and emergency assistance in the legislative framework through both Mobile Network Operators (MNOs) and Mobile Virtual Network Operators (MVNOs), develop enforceable standards, rules and benchmarks before UOMO commencement, and ensure affordability and clarify accessibility requirements. Without a strong and adequately prescriptive framework, the UOMO risks falling short of delivering enhanced access to Triple Zero and emergency assistance across Australia.

Transparency and performance standards

The NFF is concerned at the current lack of minimum performance standards enshrined in Triple Zero regulation. All parts of the process of connecting to Triple Zero – and all service providers – should be included in transparent monitoring, reporting, and accountability mechanisms. The NFF notes user experiences of failing to connect to Triple Zero that have not been properly recognised in existing monitoring metrics.

Concerns over non-conforming devices

The NFF is concerned at experiences of users being unable to contact Triple Zero due to incompatible devices. The NFF supports robust powers to block the use of devices that cannot reach Triple Zero. However, this must be accompanied by extensive public information campaigns and support for users with poor digital literacy.

Conclusion

The NFF strongly supports robust regulation to protect the integrity and accessibility of Australia's Triple Zero system. Accessing Triple Zero is crucial for the wellbeing of farmers and regional communities who face existing connectivity challenges. Triple Zero regulation should support equitable, reliable access to Triple Zero, backed by clear performance standards, and should have enough flexibility to account for emerging technologies.

We encourage the Committee to consider the perspectives of NFF member organisations and the Australian Communications Consumer Action Network

(ACCAN), whose contributions provide valuable insights into consumer needs and systemic challenges.

The NFF thanks the Committee for the opportunity to make a submission to the Triple Zero service outage inquiry.

Yours sincerely,

MICHAEL GUERIN
Chief Executive Officer