

6 March 2024

Department of Infrastructure, Transport,  
Regional Development, Communications, and the Arts  
Attention: Hon Michelle Rowland MP  
Minister for Communications

Submission via email: [usb@infrastructure.gov.au](mailto:usb@infrastructure.gov.au)

Dear Hon Michelle Rowland MP

**RE: Discussion Paper – Better delivery of universal services**

Primary Producers SA (PPSA) appreciates the opportunity to comment on the “*Better delivery of universal services - discussion paper*” released on 30 October 2023.

Primary Producers SA (PPSA) is the peak industry body representing the interests of SA primary producers. PPSA current members are Grain Producers SA, Livestock SA, SA Dairyfarmers’ Association, SA Forest Products Association, Horticulture Coalition of SA, and the Wine Grape Council of SA.

South Australia’s primary production sector has grown to \$18.5 billion dollars in agribusiness revenue, accounting for more than half of SA’s overseas merchandise exports and remaining the state’s single largest export sector in 2022-23<sup>1</sup>. There are more than 15,300 primary production businesses, supporting over 78,000 FTEs jobs in the food and agribusiness value chain.

PPSA is the South Australian member of the National Farmers Federation (NFF), and we support the implementation of the NFF Roadmap to exceed \$100 billion in farm gate value by 2030. Key to achieving this target will be ongoing improvements to telecommunications and broadband connectivity services in regional Australia.

We recognise the vital role that telecommunication services play in today’s modern, and increasingly technologically sophisticated, primary industries sector.

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<sup>1</sup> [https://pir.sa.gov.au/\\_data/assets/pdf\\_file/0004/463990/primary-industries-scorecard-2022-23.pdf](https://pir.sa.gov.au/_data/assets/pdf_file/0004/463990/primary-industries-scorecard-2022-23.pdf)

## PPSA position on the USO

As outlined in the discussion paper, the Universal Service Obligation (USO) guarantees everyone in Australia has access to a standard fixed landline phone and the provision of public payphones by Telstra. Contractual obligations have been the subject of extensive review and scrutiny.

While PPSA strongly supports the longstanding policy intent of the USO, we recognise the effectiveness of this measure is being challenged by the advent of new technologies and changing consumer preference. It is timely to consider the relevance of this policy in meeting the needs of Australian consumers both now and into the future.

As an NFF member, PPSA endorses the relevant provisions of the NFF's Connectivity and Digital Agriculture Policy which relate to the USO:

- Principle 1, *All Australians must have accessible, reliable, cost-effective, resilient, and quality connectivity outcomes.*
- Principle 3, *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.*
- Principle 9, *The rapidly and ever-changing nature of the regional connectivity environment necessitates ongoing review of contemporary policy, market, and technology settings.*

PPSA stands with the NFF in advocating for regional communities to have accessible, reliable, quality, and affordable telecommunications and broadband connectivity services. Communication services directly support health, education, and employment outcomes for regional Australia.

As the significance of digital communication services continues to grow, everyone must have equal access to their benefits, particularly in regional, rural, and remote areas of Australia, where online services are vital for these communities' social and economic opportunities.

We see a key role for both government policy and public investments to support baseline voice and digital connectivity in South Australia's rural and regional communities, and to service the primary industries sector. We consider access to reliable voice and broadband services to now be essential to doing business, and support the intent of the universal service framework.

PPSA believes consumer protection measures remain an important feature in Australia's telecommunications market, most notably in locations that would otherwise be commercially unviable to service. Successive governments have recognised the inequity that may otherwise arise in a fully deregulated market, and the essential nature of telecommunication services.

**1. What do you consider are the key outcomes that a modern universal service framework should deliver?**

**South Australian primary producers need accessible, reliable, quality, and affordable telecommunications and connectivity services to operate efficiently and support new digital technologies that improve on-farm productivity and sustainability.**

Modern telecommunication services play a vital role in various aspects of peoples' lives, such as work, education, and healthcare. The need to ensure access to reliable telecommunication services is underscored by the increasing move to online or mobile communication to access government services, impacting daily life and related commerce activities in Australia's modern society.

As one of the least densely populated states in Australia, South Australia, and the regionally based primary industries sectors battle to demonstrate the commercial incentive for network operators to invest in expanding the current telecommunications network or upgrade existing copper networks.

Furthermore, while there may be a strong consumer preference overall for mobile services, many rural and remote premises lack mobile coverage and there are no specific regulatory safeguards for mobile services beyond general consumer law.

**2. What safety-net services does a modern universal service framework need to address?**

**South Australian producers need accessible, reliable, quality, and affordable telecommunications and connectivity services to provide life-saving assistance in times of emergency.**

We strongly support the NFF in their call to deliver greater mobile coverage availability for emergency use. This is an important and urgent consideration for this inquiry to ensure that all individuals have access to reliable voice and broadband services for emergency communication, including access to emergency hotlines and services, regardless of where they live.

All too often it is local primary producers and their staff who are the first on the scene of emergency incidents. With no mobile service, they are faced with the decision to stay at the incident or drive to gain service to call for help.

For example, despite being the major north-south corridor for freight and an increasing number of tourists from Adelaide to Darwin, the Stuart Highway continues to be plagued with black spots. This is a continuing cause of angst and anxiety for the residents of the

surrounding area.

Likewise, in more concentrated farming areas where bushfires necessitate a coordinated triple-zero nature, essential coordinating calls cannot be connected. Rural mobile networks are vulnerable to congestion, especially during peak usage times, such as tourist season or a local large scale community event and in emergency situations. Temporary roaming arrangements are widely seen as a practical, and positive solution to this vital issue, and PPSA would support any such policy.

**3. To what extent do you consider mobile services are important to complement fixed services supported under the existing framework?**

Adoption of new agricultural technologies are increasingly reliant on digital connectivity, yet many areas of South Australia cannot access reliable mobile services. Sustainable and profitable agriculture in South Australia is dependent on being able to access and make full use of digital innovations and efficiencies such as ag-tech applications, crop data analysis, animal health monitoring, to list just a few.

More importantly, there are many producers in South Australia who cannot conduct day-to-day business via phone without being at their home or office base. Modern agriculture is reliant on agile decision-making regarding areas such as marketing, purchasing, and weather forecasting. In some industries, the ability to make an agile decision while in the paddock could make a difference of thousands of dollars in return for produce.

The Mobile Black Spots Program (MBSP) has successfully delivered incremental improvements over time; however, we have been made aware by telecommunications providers that many gaps remain, as investment is often deemed commercially unviable in areas of low population density.

The advent of low-orbit satellite technology is an exciting development, and many producers in South Australia are exploring how this may assist them in achieving greater connectivity. PPSA is open to exploring how this, and other innovative digital technologies can be rolled out equitably to deliver greater connectivity.

However, PPSA notes that while mobile services are an important complement to fixed services, they may not fully replace the need for a robust fixed infrastructure. We do recognize that a combination of fixed and mobile solutions may be necessary to achieve comprehensive universal service guarantees for voice communication.

## Summary

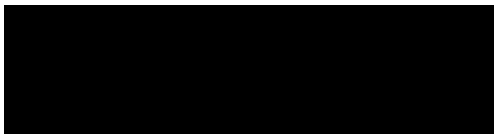
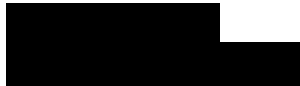
In summary, PPSA sees an ongoing role of government regulatory settings and targeted investment to support the coverage of essential telecommunications infrastructure in regional South Australia.

We have highlighted two important areas from a South Australian perspective; that maintaining baseline telecommunication services is essential for a profitable and sustainable agricultural sector, and that telecommunication services are essential in providing life-saving assistance in times of emergency.

We support the continuation of the universal service framework to directly address the potential economic and social inequity in telecommunication services across remote, rural, and regional communities.

If you, or the department have any queries regarding this submission, please feel free to contact PPSA, via [admin@ppsa.org.au](mailto:admin@ppsa.org.au).

Yours sincerely

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