



18 January 2023

Universal Services Branch
Department of Infrastructure, Transport,
Regional Development, Communications and the Arts
GPO Box 594
Canberra ACT 2601

Submitted via email: usb@communications.gov.au

**Re: NFF Submission to the Telecommunications Universal Service Obligation
(Standard Telephone Service—Requirements and Circumstances) Determination
2022**

The NFF welcomes the opportunity to provide a submission to the Telecommunications Universal Service Obligation (Standard Telephone Service—Requirements and Circumstances) Determination 2022 consultation (the Consultation).

The 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 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 has a target of reaching \$100 billion in farm gate output by 2030. This target forms part of our ambitious 2030 Roadmap – our plan to grow and advance our sector in the coming decade. A key element to achieving this target will be ongoing improvements to telecommunications and connectivity services in regional Australia. The NFF is committed to advocating for regional communities to have **accessible, reliable, quality and affordable** telecommunications and connectivity services.

The NFF notes that the Consultation more specifically pertains to views on rules for reasonable requests for Universal Service Obligation (USO) voice service connections and their fulfilment as set out in the determination, rather than broader views on current state and future of the USO arrangements. Nonetheless, given the

importance of the USO to many of our members, the NFF wishes to take the opportunity to note some key considerations pertaining the USO on behalf of our members.

The NFF strongly supports the continuation of the USO, with it delivering certainty that all premises, irrespective of location, are ensured a basic guaranteed access to voice telephony service.

While the technology to deliver mobile capability has increased exponentially and the quality and efficiency of mobile access (in general) to voice and data has improved in regional areas with significant populations, there are still major challenges for rural and remote users. The unreliability and coverage gaps of the mobile network means fixed line services are still vital to many regional users, with an assured minimum guarantee to access particularly important for those living in more remote areas.


Without certainty of access to both installation and maintenance of a standard telephone service in these areas there is increased risk of isolation for many farmers, their families and their employees. Given the potential isolation of these users, the importance of a reliable standard telephone service is vital, particularly during abnormal events such as accidents and natural disasters.

The NFF supports the ongoing nature of the Copper Continuity Obligation for Telstra particularly for rural and remote areas, until an alternate technology is available to deliver the certainty and reliability of access as required for standard voice services under the existing USO. That being said, many landline services in regional Australia are comprised of aging and detreating infrastructure networks, impacting on the provision of service continuity. NFF members report service outages with extended repair times.

Given the above, the NFF largely welcomed recommendations 7 and 8 of the *2021 Regional Telecommunications Review* regarding the USO. These being:

- **Recommendation 7:** there is strong and pressing need for USO reform to address the substantial ongoing stress on current infrastructure due to ageing technology; and
- **Recommendation 8:** the reformed arrangements allow for a technology agnostic approach to USO service delivery, providing it exceeds the existing reliability standards of the current solution.

The NFF is of the view that considerations are critical as a means to protect baseline delivery standards, but with review of evolving delivery options. While noting that reform consideration entails a substantial body of work with potential significant impacts, we encourage their consideration.

Should you seek any further information please do not hesitate to contact 

[Redacted] at [Redacted] or at [Redacted]
[Redacted]

Yours sincerely,

[Redacted]

[Redacted]