Telecommunications Industry Ombudsman

TIO Policy Position Statement – Universal Services

September 2025

1 Overview

The Telecommunications Industry Ombudsman supports the development of a modern universal services framework covering fixed voice, mobile and internet services. A modern framework must meet the needs and reasonable expectations of the Australian community. Our view is based on our experience dealing with complaints about telecommunications goods and services.

In 2025 there can be no doubt that telecommunications services are essential to the Australian community. Australians rely on fixed and mobile voice and data services to support their work, studies, social connection, and interactions with government and other critical services, such as health and financial services. To support equal participation in these fundamentals of modern life, it is important telecommunications services are universally available to all Australians, no matter where they live or their financial circumstances. During recent natural disasters and telecommunications outages, we have also seen the critical importance of reliable access to telco services in keeping individuals and communities safe.

Since it was developed in the 1990s, the universal services framework has played a vital role in ensuring universal access to voice services. However, it has not kept pace with the needs and expectations of Australian consumers, or with the realities of Australia's modern wholesale environment. This has resulted in some consumers not having access to the telco services they need, and (in some cases) inefficient use of Australia's telecommunications infrastructure.
To meet the needs of Australian consumers, the framework should incorporate the following principles:

(a) Connectivity – The framework should ensure Australians can *connect* with the people and services they need for safety, connection and participation in society. This means the framework should include all communications services Australians rely on to stay connected and keep safe. In 2025, that includes at a minimum a framework that covers voice *and* broadband services at Australians' homes and places of business. The framework should also recognise the increasingly essential nature of mobile services.

(b) Accessibility – It is crucial Australians can depend on the framework to provide *access* to the telco services they need. This means the framework should seek to remove barriers to accessing universal services and ensure baseline services are available and affordable. Part of this is recognising the continued role of payphones by ensuring they remain widely available in the community. Being accessible means consumers can directly enforce their rights or seek redress, without having to rely on their retailer to enforce standards against a wholesaler, for example. For the framework to be accessible to all Australians, it must also be inclusive in its approach to providing access. This means the information telcos supply and the processes they use to provide universal services should account for the diverse needs of Australians, including those from CALD backgrounds and those living with disability.

(c) Reliability – An effective framework is one Australians can *rely* on to provide the services they need. This means the framework should include clear and enforceable service and quality standards for voice and broadband services, including reasonable standards for mobile services (including clear and transparent coverage information). It also means consumers should be entitled to compensation when telcos do not meet those standards.

(d) **Adaptability** – For the framework to remain relevant to the evolving communications needs of Australians, it needs to be able to *adapt* as those needs change. A modern framework should incorporate regular review mechanisms to ensure the service types and service standards it requires (for example, minimum download bandwidth requirements) keep pace with the reasonable expectations of the community. Being adaptable also means having the flexibility to respond to new technologies as they emerge and being fit-for-purpose in the modern wholesale environment. A modern framework should be technology-neutral and seek to use the most efficient and effective technologies to deliver universal services, as needed from time to time.

2 Future State

Planned future change to government policy – the recently announced Universal Outdoor Mobile Obligation (UOMO)

In February 2025, the Federal Government announced its intention to implement a Universal Outdoor Mobile Obligation (**UOMO**). This new obligation would require Mobile Network Operators (**MNOs**) to provide equitable access to baseline outdoor mobile coverage for voice and SMS services across Australia. The objectives of the policy are to expand access to Triple Zero across the nation, expand outdoor mobile coverage to cover existing black spots, and improve the availability of mobile services during disasters and power outages.

Only high-level information about the policy is currently available. The intention is for MNOs to use their own mobile networks in conjunction with Low Earth Orbit Satellite (**LEOSat**) technology to provide increased access to mobile services. We assume the policy may ultimately require MNOs to partner with LEOSat providers to fill gaps in existing mobile coverage, via direct-to-device (**D2D**) connections.

The Government intends to consult on and introduce legislation for the UOMO in 2025, with implementation currently expected in late 2027. MNOs are already in the process of exploring D2D service options. In June 2025, for example, Telstra launched D2D SMS capability for its customers using a selection of modern mobile devices over the Starlink LEOSat network. We understand LEOSat D2D technology is currently only suitable for sending SMS, and that there are still technical challenges that need to be overcome before LEOSat D2D technology is fully suitable for voice calls.

What changes to the rules do we want to see?

1 A new, unified universal services regime that explicitly includes fixed broadband services

We support a single, coherent and technology-neutral piece of regulation that incorporates the protections currently included in the Universal Service Obligation (**USO**), the Customer Service Guarantee (**CSG**) Standard, and the Statutory Infrastructure Provider (**SIP**) regime. The regime should explicitly entitle Australian consumers to fit-for-purpose broadband services at their homes and places of business. Obligations under the CSG Standard and the USO should be retained (including the existing USO requirements for payphones) but should be modernised to make full use of the most efficient and effective technologies available. For example, a modern universal services framework would see the USO provider empowered to deliver USO voice services over SIP fixed wireless connections (subject to appropriate service quality standards for those services). We understand this is not currently possible on NBN fixed wireless connections due to misalignments between the SIP regime, the USO, and NBN Co's current fixed wireless wholesale terms.

2 The inclusion of mobile services in the universal services framework

In recent years the TIO has consistently called for mobile services to be recognised as essential services. We support a modern universal services framework that accounts for the essentiality of mobile services by supporting access to mobile coverage almost everywhere across Australia. In principle, we support the Government's recently announced UOMO, which should go some way to achieving this.

Part of making mobile services universally accessible to Australians is ensuring they have access to accurate information about the level and quality of coverage available. We receive complaints from consumers who say their telco's coverage map does not reflect the actual coverage available to them. This may be because a telco's coverage map does not account for the effects of local topography, or does not disclose areas of network congestion or coverage blackspots. We support regulatory change to require MNOs to ensure the accuracy of coverage maps by including a reasonable level of information about known mobile blackspots and geographical areas where they know their mobile networks are regularly congested.

3 Clear service and quality standards for voice and broadband services supplied under the framework, particularly those delivered over SIP infrastructure

Consistent with the principle of reliability in a modern universal services framework, we support the development of clear and enforceable service and quality standards for voice *and* broadband services.

The CSG Standard currently provides minimum connection and repair timeframes for landline services, but its waiver mechanism means that in practice it generally applies to only a handful of major telcos. The rules currently contained in the CSG Standard should be revised to reduce or remove the scope for telcos to require consumers to waive the protection of its connection and repair timeframes.

We support the Government developing service standards for SIP internet services as a matter of priority. These would impose mandatory minimum connection and repair timeframes for SIP internet services, as the CSG Standard does for landlines. Like the CSG Standard, a SIP service standard should provide for consumers to be compensated when telcos do not meet the required standards. We see complaints where telcos tell consumers they must wait significant periods of time for their internet service to be connected or repaired. A SIP service standard would incentivise telcos to complete timely connections and repairs.

To complement service level standards for SIP services, the framework should include clear and enforceable *service quality* standards for broadband and voice services connected using SIP infrastructure. The *Telecommunications Act 1997* prescribes minimum peak download and peak upload bandwidth for SIP services (currently 25Mbps download and 5Mbps upload, but this is under review, with the Government considering a minimum peak download bandwidth of 100Mbps). However, bandwidth is only one of several important service quality metrics for internet services. In addition to the minimum peak bandwidth requirements, we support minimum standards for other important metrics including latency, jitter, and packet loss. While historically there have been mandated quality standards for voice services delivered over copper technology, we understand there are currently no clear and enforceable quality metrics that apply to VoIP landline services.

Service quality standards will assist telcos, regulators, and our office in determining whether a service is underperforming, or should be considered faulty, such that a mandatory repair timeframe applies.

In the medium-to-long term (some time after the likely introduction of the UOMO), we would also call for the introduction of reasonable mandatory service levels and service quality standards for mobile services. For example, such a standard could provide mandatory repair timeframes for faults affecting mobile towers. Any service and quality standards for mobile services will need to be realistic and reflect what is reasonably achievable with current mobile technology. In line with the policy intent of the UOMO, for example, it may be appropriate for service quality standards to apply to outdoor mobile coverage only.

4 Obligations consumers can enforce directly

To be accessible, a framework must provide for consumers to be able to rely on it directly to obtain the services they need. Both the USO and the CSG Standard create rights that consumers can claim against a retail provider, which means they are more accessible than obligations that exist only at the wholesale level. We see complaints where, for example, a consumer's internet connection is performing poorly but their retail provider has difficulty getting traction with the relevant SIP to get it repaired. In these cases, we sometimes see that the retailer 'gives up' and does not seek to fully enforce rights it may have under its wholesale arrangements to get the service repaired.

A common scenario we see is where a consumer's retailer and the relevant SIP each say the other is responsible for taking action to rectify a fault or service difficulty. This often results in consumers feeling powerless to get their services fixed, as they can only rely on their own contractual and general consumer protection rights, some of which can only be claimed against the retailer. In the broadband space, these may entitle the consumer to compensation or a waiver of charges but cannot compel connection or repair of a service.

So, we support any mandatory service and quality standards under the framework (including any standards that are introduced for SIP internet services) being directly enforceable by consumers. Compensation payable for breaches of these standards should be paid to consumers. The framework also should include an explicit entitlement for consumers to access broadband services at their homes and places of business, as the USO currently does for landline services. In practice the SIP regime already provides broadband access to most consumers by making wholesale services available to retailers. However, to ensure the accessibility of these essential services, consumers should have a direct and enforceable right to access broadband services.

5 A periodic review mechanism for the services and quality standards required by the regime

To ensure the framework adapts to the contemporary needs and expectations of Australians and the most appropriate available technologies, it should be reviewed regularly. We support the inclusion of a regular review mechanism to set appropriate levels for the key performance thresholds for universal telecommunications services, and to determine whether there are any new service types that ought to be included in the regime. This should include review of minimum requirements for the bandwidth, latency, jitter, and packet loss of SIP broadband services.

To facilitate the revision of these requirements, government should include them in subordinate instruments, rather than in primary legislation. On 14 May 2025 we supported an increase in the legislated SIP peak download and upload speed requirements. In our submission, we suggested the minimum legislated bandwidth requirements be moved into a subordinate instrument to support future flexibility in regulatory changes.

6 An affordable fixed broadband option for consumers on low incomes

We know cost can be a barrier to some consumers accessing essential telecommunications services, particularly consumers on low incomes, and those living in regional, rural and remote areas. To support equity of access to universal services, it is important affordable options are available to those who need them. We would support the development of an affordable fixed broadband option for consumers on low incomes.

7 An increased focus on targeted solutions for First Nations communities

Our experience shows that remote First Nations communities have unique telecommunications needs. For example, we know consumers in these communities often rely on prepaid mobile services and payphones, rather than expensive or potentially unreliable fixed-line services. To ensure the accessibility of the universal services framework, we support increased consultation with individual First Nations communities to develop and implement telecommunications solutions tailored to meet their needs.