



2 April 2026

Environment and Communications Legislation Committee
The Senate

Dear Committee

Submission to Inquiry into the Telecommunications Legislation Amendment (Universal Outdoor Mobile Obligation) Bill 2025

Thank you for the opportunity to contribute to your inquiry into the Telecommunications Legislation Amendment (Universal Outdoor Mobile Obligation) Bill 2025 (**UOMO Bill**).

Our office welcomes legislation introducing the Universal Outdoor Mobile Obligation (**UOMO**) as an important step in incorporating mobile services into Australia's universal services framework. Australians are increasingly reliant on mobile services for connection in their everyday lives. The UOMO recognises this by requiring that baseline mobile coverage be reasonably available outdoors across the Australian continent. In line with our [Universal Services Policy Position Statement](#), we support the UOMO as a valuable part of the universal services framework.

Complaints received by our office reflect the vital importance of mobile services to the Australian community. Our 2024-2025 Annual Report¹ found mobile remained our most complained-about service type, representing at least 44.7% of all complaints to our office in FY25.² Complaints marked with our 'poor mobile coverage' keyword increased 22.7% year on year in FY25³ (to a total of 3,141 complaints), driven in part by complaints relating to the October 2024 shutdown of Australia's remaining 3G mobile networks.

We support a flexible UOMO Bill, provided important issues are addressed in subordinate legislation

The proposed structure of the UOMO Bill would set out the broad legislative framework for the UOMO in a new Division 2A of Part 2 of the *Telecommunications (Consumer Protection and Service Standards) Act 1999 (TCPSS Act)*. This would leave the detail of the UOMO rules to be determined in subordinate instruments, including matters such as service standards for the implementation of the UOMO, and additional service types to which the UOMO may apply in future. We support this approach, as it will make it easier for the detail of the rules to be amended as appropriate from time to time, and keep pace with the needs

¹ [Our 2024-25 Annual Report](#).

² For reporting purposes, we categorise complaints to our office as belonging to one of the five service types Mobile, Internet, Landline, Property, and Multiple. Complaints categorised in the Multiple service type are those that relate to more than one of the other four service types. Accordingly, the 44.7% of all complaints received in FY25 that were categorised in the Mobile service type were those that related *only* to mobile services.

³ This figure refers to the percentage increase across all complaints, including those categorised in the Mobile service type *and* the Multiple service type. When considering only complaints categorised in the Mobile service type, the year-on-year increase was 25.2%.

and expectations of the Australian public. To ensure the UOMO successfully achieves tangible outcomes for consumers through readily enforceable obligations on providers, the relevant subordinate instruments will need to be sufficiently specific about what the Primary Universal Outdoor Mobile Providers (**PUOMPs**) are required to do in order to comply.

In implementing the UOMO, it will also be important for government to recognise the particular importance of the UOMO's obligations for those living in rural, regional, and remote Australia. The implementation of the UOMO will need to appropriately prioritise the areas of greatest need to ensure it meets its goal of providing outdoor mobile coverage to all people in Australia on an equitable basis.

Our proposed amendments to the Bill

Our October 2025 submission to the Department on the UOMO Bill Exposure Draft⁴ contains detailed feedback about how the UOMO Bill could be improved, based on our experience dealing with telecommunications complaints. Most of our October 2025 feedback remains relevant to the current version of the Bill. In summary, our key feedback included the following:

- **The UOMO Bill should provide scope for in-vehicle coverage to be included in the UOMO in future.** The current drafting of the Bill excludes mobile coverage inside vehicles from the UOMO and there is no scope for the Minister to alter this in future.⁵ While we acknowledge current technological limitations make it impractical to apply the UOMO to in-vehicle coverage, we anticipate the relevant technologies may one day evolve to the point where it would not be unreasonable to include such coverage and see no reason why it should be excluded at this time.
- **We support a connectivity test for 'designated mobile telecommunications services'.** Unlike the existing Division 2 of Part 2 of the TCPSS Act, the proposed Division 2A (dealing with the main UOMO obligations) does not include a connectivity test for the 'designated mobile telecommunications services' it covers. The connectivity test for standard telephone services in Division 2 is important because it ensures services covered by the Universal Service Obligation can both make and receive telephone calls across different telecommunications networks.⁶ Without a connectivity test for 'designated mobile telecommunications services', there is a risk that services provided to comply with the UOMO will not be fully interoperable with services delivered on all carrier networks.
- **The UOMO Bill should clarify that performance standards can be made for UOMO services under section 115 of the TCPSS Act.** As the UOMO is implemented and develops into the future, it will be important for consumers to have confidence that they can rely on its protections. In our view, a reliable UOMO would in time provide for consumers to be compensated when a PUOMP does not meet its obligations under the UOMO. The *Telecommunications (Customer Service Guarantee) Standard 2023* currently provides similar protections for landline services, and was made under section 115 of the TCPSS Act. We support changes to the Bill to clarify (for the avoidance of doubt) that section 115 of the TCPSS Act can be used to make a performance standard for a 'designated mobile telecommunications service' supplied to comply with the UOMO.

⁴ [Our submission to the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts on the Universal Outdoor Mobile Obligation draft legislation.](#)

⁵ See paragraph (b) of the proposed definition for 'outdoors' in item 7 of the UOMO Bill.

⁶ The connectivity test is set out as part of the definition for 'standard telephone service' in subsection 6(2) of the TCPSS Act.

We look forward to seeing the final version of the UOMO legislation when it passes parliament.

Yours sincerely,

Cynthia Gebert

Telecommunications Industry Ombudsman