

BIRRR SUBMISSION

EXTENSION OF CUSTOMER SERVICE GUARANTEE (CSG) INSTRUMENTS



BIRRR

**BETTER
INTERNET FOR
RURAL,
REGIONAL &
REMOTE AUSTRALIA**



Submission Date: 27th March, 2026

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This submission was prepared in good faith by a voluntary team.
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Executive Summary

Better Internet for Rural, Regional and Remote Australia (BIRRR) welcomes the opportunity to provide a submission to the Department's consultation on extending the Customer Service Guarantee (CSG) instruments.

BIRRR's position is that the current CSG framework is no longer fit for purpose. While it continues to play an important role, particularly across rural, regional and remote (RRR) Australia, its effectiveness is increasingly being undermined in practice. The framework remains reliant on legacy structures and has not kept pace with changes in technology, market dynamics, or the way consumers now access and depend on telecommunications services.

RRR consumers are facing mounting telecommunications challenges. These include poorly executed technology migrations, declining service reliability, increasing system complexity, limited competition, rising costs, and instances of misinformation and sales-driven bias. As a result, consumers are being forced to invest more time, effort and money simply to achieve and maintain a basic level of connectivity. The burden is increasingly falling on end users to navigate a system that does not reflect their circumstances or needs.

There is also a clear and concerning disconnect between reported performance and lived experience. Coverage maps, complaint statistics and national averages often fail to capture the reality for many RRR and First Nations consumers, particularly those in areas with limited or no mobile coverage. In many cases, the same individuals and communities experience repeated service failures and harm that remain effectively invisible within aggregated datasets.

Further concern has arisen from the rollout of new technologies and service models without sufficient testing under real-world RRR conditions. In environments characterised by vast distances, extreme weather, and unreliable power, it is critical that any proposed solution is demonstrably fit for purpose before being deployed at scale. Without this assurance, there is a risk that new systems may compound, rather than resolve, existing challenges.

More broadly, there is a growing view that telecommunications standards have gradually declined to a point where incremental adjustments are no longer sufficient. What may once have been considered

acceptable service levels no longer meet the needs of modern Australia, particularly in regions where connectivity underpins safety, emergency response, and economic participation. In some circumstances, gaps in service are not merely inconvenient; they present genuine risks to wellbeing and, at times, to life.

In this context, BIRRR does not support the extension of the CSG instruments without a clear, time-bound commitment to broader reform of the Universal Service Obligation (USO). Extending the CSG in its current form risks entrenching an outdated framework while consumer protections continue to erode in practice.

A comprehensive review and modernisation of both the CSG and USO is required, not incremental change, but a fundamental reset. Reform must deliver technology-neutral, enforceable protections aligned with how telecommunications services are delivered and relied upon today.

Addressing these issues presents a critical opportunity for Government and regulators to demonstrate leadership, restore confidence and ensure policy reflects the realities faced by all Australians, regardless of location. However, this window of opportunity is closing rapidly. In three years' time consumers will have already faced multiple technology migrations. Without immediate and decisive action, there is a real and imminent risk that existing consumer protections will be lost before equivalent, enforceable safeguards are established within emerging and replacement service models and consumer trust will have declined even further.

The telecommunications landscape is evolving faster than the current regulatory framework can respond. A three-year extension of the existing CSG risks locking in outdated settings at precisely the time when reform is most urgent. By the end of such an extension period, the underlying framework may be so misaligned with how services are delivered that meaningful protections are no longer recoverable without significant disruption.

Without prompt and substantive reform, the gap between regulatory protections and actual service delivery will not just widen, it will become entrenched. This will have serious consequences for consumers, particularly in RRR Australia, where telecommunications are essential to safety, emergency response, and economic participation. In these areas, declining standards are not an abstract policy concern, they are already having real-world impacts, with the potential for increasingly serious consequences if left unaddressed.

BIRRR Recommendations

1. Do not extend the CSG instruments without USO reform

- Do not proceed with CSG extension without a clear, time-bound commitment to broader USO reform. Immediately establish and publish a clear pathway and timeline for USO reform. Any CSG extension must be contingent on immediate and demonstrable progress toward reform
- Introduce more granular rural, remote and very isolated performance benchmarks and reporting requirements prior to any extension

2. Protect consumers during migration and transition processes

- Ensure consumers migrating from legacy services do not experience a reduction in service reliability or consumer protections
- Maintain redundancy and access to essential voice services throughout transitions and ensure that those without mobile coverage can still access affordable and needs based backup options
- Require providers to clearly communicate rights, protections and impacts to consumers and communities prior to migration

3. Strengthen service standards to reflect real-world reliance and risk

- Prioritise remote and very isolated consumers where no or limited alternative services exist
- Move beyond geographic, distance and population-based classifications for connection, repair and maintenance timeframes. Incorporate the availability of backup services and frequency of recurring faults, so that connection, repair and maintenance timeframes are aligned with a consumer's ability to access affordable backup services
- Increase compliance benchmarks to at least 95%
- Embed enforceable consumer protections across all technologies, not just legacy voice services
- Ensure providers make available to consumers accessible fault reporting processes, that allow a consumer to track a fault and repair processes and timelines.

4. Strengthen consumer protections, accountability and enforcement

- Improve visibility and accountability for provider performance and breaches
- Introduce escalating penalties for repeated or prolonged breaches, particularly where the same consumers or locations are impacted and ensure penalties reflect cumulative harm
- Direct penalty funds away from consolidated revenue and back into impacted communities, through investment in improved services, support and connectivity literacy initiatives, e.g. Regional Tech Hub

5. Improve consultation processes

- Provide longer and more accessible consultation timeframes
- Ensure RRR lived experience is meaningfully captured and reflected in policy outcomes
- Review the 'consult', 'extend', 'review' process and move to more direct oversight and accountability of the RRR telecommunications landscape.

The 2023 Thematic Review of the CSG

BIRRR's position on the CSG remains unchanged from the 2023 Thematic CSG Review. The issues raised at that time, particularly relating to the reliability, availability and support of standard telephone services, remain unresolved and, in many instances, have worsened, continuing to impact RRR consumers.

There has been limited visible progress in addressing these concerns. Delays in connections and repairs persist, alongside ongoing challenges in fault identification, resolution, interim services and consumer support. BIRRR continues to see widespread examples of misinformation, disinformation and mis-selling by providers, and more concerningly, disregard for consumer rights.

Since 2023, additional risks for consumers have emerged through large-scale telecommunications migration processes, including Telstra's planned exit from CAN Radio / High Capacity Radio Concentrator (HCRC), the 3G shutdown and migration of Next Generation Wireless Loop (NGWL) voice services, and the withdrawal of Vocus from wholesale copper services. These changes have and are continuing to create compounding issues for consumers. Technology migrations for rural and remote consumers are often poorly implemented, poorly communicated and often reinforce inaccurate and misleading information.

Continued Relevance of the CSG in RRR Australia

The industry narrative that the CSG is declining in relevance does not reflect the reality for consumers in rural and remote Australia. For many consumers, particularly those outside reliable mobile coverage, fixed voice services remain essential and, in many cases, the only dependable form of communication, particularly during power outages and adverse weather.

As highlighted in BIRRR's submission to the 2023 Thematic Review, many RRR consumers continue to rely on legacy voice services delivered over copper and other terrestrial infrastructure where the CSG still applies. While national data shows declining use of fixed voice services, this trend is largely driven by metropolitan and regional populations and an industry push towards Voice over Internet Protocol (VoIP) and mobile services. ACMA data indicates that approximately 63% of Australians are now mobile-only for voice calls, with only around 36% maintaining a fixed voice service¹. However, these

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<https://www.acma.gov.au/publications/2022-10/report/how-australians-make-voice-calls-home#:~:text=We're%20still%20moving%20away,and%20the%20increase%20is%20slowing.>

headline figures often mask significant variation across the subsets of rural, remote and First Nations populations.

BIRRR is increasingly concerned that, while the CSG remains highly relevant, its practical application is being eroded. As providers transition consumers onto newer technologies, the protections afforded under the CSG are being diluted. Whether driven by operational simplification, operators' sales objectives or regulatory gaps, the outcome is the same, consumers are losing protections.

The CSG framework was designed in a very different telecommunications environment. While benchmarks were introduced in 2011, the core structure has remained largely unchanged since the late 1990s. It has not kept pace with changes in technology, market structure or consumer reliance on telecommunications as an essential service. In its current form, the framework risks reinforcing existing gaps in competition, entrenching long-standing barriers and leaving RRR consumers vulnerable to historic inequities that continue to shape service access and outcomes today.

Previous extensions of the CSG were intended to allow time for reform, including consideration of the nbn Special Access Undertaking (SAU). However, BIRRR does not consider these processes have addressed the issues raised in our 2023 submission and subsequent submissions made across regulatory and Government consultations. The ongoing cycle of “consult”, “consider”, “review” and “extend” continues without meaningful action.

Consumer Rights, Awareness and Connectivity Literacy

Many consumers remain unaware of their rights under the CSG, Telecommunications Consumer Protections (TCP) Code and USO frameworks, the avenues available to seek assistance (including the Telecommunications Industry Ombudsman (TIO) and independent support services), or their eligibility for compensation. Consumers often trust that their provider will act in their best interests. However, when this is not the case and when protections are poorly understood, inconsistently applied or not clearly communicated, this leads to poorer outcomes.

In rural and remote Australia, the issue is not just usability, it is whether standard telephone services are made available, maintained, repaired and accurately represented to consumers. BIRRR continues to receive reports of consumers being incorrectly advised that copper or standard telephone services are no longer available, when regulated voice services should remain accessible under existing operator obligations. This misinformation, whether through sales channels, support pathways or

migration processes, often results in consumers being forced to accept alternative arrangements and hence being transitioned away from services that carry enforceable protections, often without fully understanding the implications. When issues arise, consumers often face complex and opaque processes to seek resolution. After repeated attempts to access what they are entitled to, many become frustrated and disengage entirely, leaving them without a functioning voice service or critical backup.

This highlights the importance of connectivity literacy, defined as the awareness, knowledge and confidence needed to get and stay connected to telecommunications services². In the current environment, providers are increasingly shaping the narrative, operating at the edges of obligations, redefining what constitutes a “service”, and exposing consumers to misinformation, mis-selling and sales bias. Without sufficient connectivity literacy, consumers are less able to understand their rights, identify when standards are not being met, or navigate complaints and escalation pathways.

Despite connectivity literacy being consistently identified in multiple reviews as critical to improving RRR consumer outcomes, there has been no meaningful increase in funding or resourcing to support it, and no clear action or engagement from Government or regulators to demonstrate it is being prioritised. This is particularly disappointing given the Regional Tech Hub was long advocated for and has demonstrated, exponentially, its value as a critical, independent support service for RRR consumers, yet there remains no certainty around its funding beyond June 2026.

Building connectivity literacy should not be left to volunteers, under-resourced independent organisations or industry-led, sales-driven channels. This is fundamentally a Government responsibility. Continued reliance on these pathways reflects a failure to invest in the capability needed for consumers to access their rights, navigate services, utilise available protections and fully benefit from Government telecommunications investment. Without sustained, coordinated leadership and funding, protections like the CSG will continue to exist in policy, but not in practice.

Current policy settings continue to place the burden on consumers to navigate complex systems, while favouring industry-led communication. Even where protections are amended, there is no coordinated effort to inform consumers of their rights or clarify whose responsibility it is to do so. It cannot be left to telecommunications providers, who operate with clear commercial and sales incentives.

² <https://birrraus.com/connectivity-literacy-2/>

In an environment where services, technologies and obligations are rapidly evolving, connectivity literacy is not optional, it is essential. It is a critical safeguard to ensure consumer protections are not only available in policy, but accessible in practice, enabling consumers to be informed, empowered and able to act on their rights.

Telco Conduct, Migration and Loss of Protections

BIRRR continues to receive consistent reports of misleading and incomplete advice being provided to consumers regarding the availability of standard telephone and nbn services. Consumers are frequently told that nbn services are not available, landlines cannot be reconnected, or must be transferred to alternative technologies such as VoIP, when in many cases this is inaccurate under existing obligations.

Consumers are also being advised that their existing voice services are too expensive to maintain, too old or no longer supported. However, commercial operator decisions should not override regulatory obligations. Despite the continued existence of USO and Copper Continuity Obligations (CCO), consumers are being moved away from regulated voice services without clear explanation of their rights or the CSG protections they are losing.

BIRRR notes the broader industry shift toward satellite services to replace legacy terrestrial technologies. However, the CSG contains limited safeguards to protect consumers during these migrations or to ensure they are not worse off in terms of reliability and service outcomes. In these contexts, reliance on fixed voice services remains high, particularly for older Australians, medically vulnerable consumers and those with no viable alternatives. For these consumers, the CSG remains a critical safeguard.

Telecommunications consumer outcomes are often driven by sales-led processes, where the solution presented reflects product availability and business objectives, rather than consumer needs or entitlement. As a result, consumers are often directed toward alternative technologies that may be less reliable, require additional costs, and do not carry equivalent consumer protections. This has contributed to a broader erosion of trust in telecommunications providers, with many RRR consumers increasingly uncertain about the accuracy of advice provided.

Migration processes are frequently occurring by default, or through opt-out arrangements. In theory, these technology transitions should be carefully planned, cohort-specific and supported by clear

communication, maintained redundancy and strong consumer protections. In practice, many have been rushed and poorly executed, with providers continuing to make the same mistakes.

As legacy services are withdrawn, redundancy is also being lost. Voice and broadband are increasingly being pushed by providers onto single technology pathways, meaning when the power fails or extreme weather hits, there is no backup.

At its core, this is not just a consumer awareness issue, it is a conduct issue. Extending the CSG instruments without addressing the behaviours of providers, and ensuring that modern consumer needs such as redundancy are embedded within CSG standards, risks accelerating the erosion of regulated voice services and further embedding misinformation in the market. Without stronger oversight and enforcement, the protections that exist on paper will continue to diminish in practice.

Interim and Alternative Services

BIRRR remains concerned that interim and alternative services, as currently applied under the CSG, are not fit for purpose in many rural and remote areas. As raised in the 2023 Thematic Review, these services are often deployed in ways that do not reflect the realities of the locations they are intended to serve.

Under current arrangements, providers are not required to meet CSG timeframes or pay compensation where a “reasonable” interim or alternative service has been offered. In practice, this creates a significant loophole, allowing obligations to be technically met without delivering a functional outcome for the consumer.

Interim services are frequently delayed, with equipment sent via post or courier, leaving consumers without a working voice service for extended periods. Once received, consumers are often required to install and troubleshoot services themselves, with limited or no access to real-time support.

In many cases, the services provided are not usable at the premises. Mobile-based interim services are sent to areas with little or no coverage, and satellite solutions often don’t function reliably due to environmental conditions or installation constraints. BIRRR continues to see examples of interim services arriving weeks after they were promised, not working on arrival, or being unsuitable for the location.

Once an interim or alternative service is accepted, consumers lose their entitlement to compensation, even when the service does not meet their needs. This can leave consumers without any effective recourse, while also delaying resolution of the original fault, sometimes for months, or in extreme cases, up to a year following major events.

This creates a situation where obligations can be technically met, while consumers remain without a reliable or functional voice service. For RRR consumers, this is not a minor inconvenience, it can mean being left in a geographically isolated location without a dependable means of communication for extended periods.

Performance Metrics and Use of Aggregated Data

National averages often do not reflect the lived experience of those in rural and remote Australia. Averaging figures are largely influenced by metropolitan and regional users with access to multiple networks, devices and service options. They do not account for consumers in areas with limited or no mobile coverage, where a fixed voice service often remains the only reliable means of communication.

The current CSG performance framework, including the 90% compliance benchmark, risks masking systemic underperformance in rural and remote areas. While providers may meet aggregate targets, this can conceal repeated failure experienced by the same consumers and communities.

Over the years, BIRRR has collated extensive evidence of mis-selling, misinformation, anti-competitive conduct and poor support processes, supported by detailed case studies provided to Government and regulators. Too often, these are treated as isolated incidents rather than recognised as systemic issues occurring at scale across RRR Australia, largely because smaller populations generate lower complaint volumes and do not materially impact aggregated reporting. As a result, regional harm is effectively hidden within national data sets. Regardless of population size, every consumer who is not informed of their rights or is unable to access an essential service, matters.

BIRRR previously recommended that the compliance benchmark be increased to at least 95%, if not higher, to better reflect acceptable service standards and drive improved performance. This remains an ongoing issue across both standard telephone services and NBN-delivered services, where current benchmarks do not adequately capture the lived experience of RRR consumers. The “tail” of underperformance, those cases that fall outside standard timeframes, is where many rural and

remote consumers sit. These are not one-off exceptions, but often prolonged or recurring issues that are not adequately captured or addressed through current reporting.

There is also a structural issue in how performance is measured. Providers are able to rely on “we got it right 90% of the time” metrics, while the same 10%, often those in the most remote and vulnerable locations, continue to experience poor service, repeated faults and limited recourse. For these consumers, the system is not working, and extending the CSG in its current form will allow this to continue without consequence.

While record-keeping and reporting requirements provide system-level visibility, they do not address the core issue, whether consumers are being informed of, and able to access, the services, protections and compensation they are entitled to. Thus, creating a growing gap between what the CSG framework is designed to protect and what consumers actually experience.

Separate and more granular rural, remote and very isolated performance benchmarks and reporting requirements should be introduced as a priority to ensure underperformance in these areas is visible and addressed. This should be implemented prior to any extension of the CSG instruments, rather than deferred as part of future reform.

Connection, Repair Timeframes and Fault Handling

Connection and repair timeframes for standard telephone services remain longer in rural and remote areas, and continue to fall short of modern expectations. As raised in 2023, these timeframes reflect assumptions from decades ago, despite significant improvements in road, air and rail access. In contrast, consumer reliance on telecommunications has increased dramatically.

RRR consumers continue to experience delays, repeated faults and degraded services, often over extended periods. The burden frequently falls on the consumer to prove that a fault exists before any action is taken, with service timeframes only commencing once the provider formally accepts the issue. Escalation pathways are often unclear or ineffective, and complaints can take months to progress or resolve.

Even where consumers escalate matters to the TIO, outcomes are frequently unsatisfactory. Resolution timeframes remain excessive, and in many cases, the result is limited to account credits or financial adjustments while the underlying service fault persists. This leaves consumers in the

untenable position of having formally exhausted complaint pathways without achieving a functional or reliable service, further eroding confidence in the effectiveness of existing consumer protections.

Providers often refer to remote locations as “special access” or “difficult access”, reinforcing longer timeframes as acceptable. Additionally, as mobile services sit outside CSG protections, consumers and communities are often left with limited recourse when faults or outages occur. In practice, this allows providers to avoid accountability on the basis that no enforceable service guarantee applies to mobile services.

Recent issues with Telstra mobile small cells using OneWeb backhaul³ highlight how difficult it is to have faults addressed in these environments. BIRRR has been advocating on behalf of affected members for over 12 months, yet these issues remain unresolved, despite impacting access to Triple Zero and emergency services.

This does not reflect the reality that these communities are equally dependent on mobile services, where available, and on reliable connectivity more broadly for safety, education, healthcare and business operations.

Emerging service models risk entrenching these issues. For example, assurance timeframes for nbn’s Amazon LEO migration for many remote services are proposed to extend to 10 - 15 business days or more. This does not account for the time taken for a consumer to report a fault, for the retail provider to respond and escalate, and for the issue to be actioned and resolved. In practice, this can result in consumers being without service for several weeks or even months.

Current repair and maintenance timeframes also fail to reflect a consumer’s access to backup services. In metropolitan and regional areas, consumers have multiple pathways to maintain connectivity during an outage or fault. In remote and very isolated areas, this is rarely the case. Where no redundancy exists, outages have significantly greater consequences and should be prioritised accordingly.

Remote and isolated consumers are also often reliant on the least reliable forms of connectivity. Mobile coverage is frequently non-existent, patchy, limited or congested and, following the 3G shutdown, has become effectively unusable in many rural and remote areas. Satellite services, while increasingly promoted as the only available solution, are subject to weather impacts, higher latency

³ <https://www.itnews.com.au/news/telstra-quietly-stops-leosat-rollout-across-remote-mobile-sites-623838>

and packet loss. Power supply is also less reliable, with many consumers required to generate their own power, and these communities are also more exposed to natural disasters and extreme conditions.

Timeframes should be adjusted to reflect these realities, with remote and very isolated consumers receiving higher priority rather than being disadvantaged by geography, distance or population size. Classification of service areas should consider the availability of backup services, the reliability of underlying technologies, and the frequency of recurring faults, not just geographic remoteness. Without this, the most vulnerable consumers will continue to face the longest timeframes and the least reliable outcomes, despite having the greatest need for dependable connectivity.

At a time when government and society expect constant, always-on connectivity, the CSG framework is no longer acceptable. For remote consumers, prolonged outages directly impact the ability to contact emergency services, access education and telehealth, and operate businesses. Current standards are not reflective of modern reliance on telecommunications services and require urgent review.

Penalties, Breaches and Incentives

BIRRR remains concerned that the current CSG compensation and penalty framework is not driving improved behaviour from telecommunications providers or better outcomes for consumers. As raised in 2023, compensation levels have not kept pace with the critical role telecommunications now play across the community. In some cases, it is more cost-effective for providers to pay compensation than to resolve complex or persistent faults.

For many RRR consumers, compensation is not the primary concern, restoring a reliable service is. However, where incentives are misaligned, delays and repeat faults can persist without meaningful consequence for providers. Visibility and accountability around breaches also remain limited, particularly in smaller or remote communities where ongoing issues may not be reflected in aggregated reporting.

Escalating penalties should be introduced for repeated or prolonged breaches, particularly where the same consumers or locations are impacted over time. This would better reflect the cumulative harm experienced and create stronger incentives for timely resolution.

Where penalties are applied, they should directly benefit the consumers and communities affected, rather than returning to consolidated revenue. This could include reinvestment into improved services, targeted support mechanisms or connectivity literacy initiatives in impacted areas, including support for trusted services such as the Regional Tech Hub.

Without stronger incentives and more meaningful consequences, the current framework risks allowing poor performance to continue without driving the level of improvement required.

Urgent Need for Reform

The current CSG framework is not fit for purpose in today's telecommunications environment. It does not reflect how services are now delivered, nor the level of dependence RRR communities have on reliable, resilient and affordable connectivity for safety, healthcare, education, business and everyday life.

The CSG cannot be considered in isolation. Its effectiveness is directly linked to broader USO settings, yet meaningful USO reform remains outstanding. There has also been limited action following the 2024 Regional Independent Telecommunications Review (RTIRC), reinforcing BIRRR's concerns that key structural issues and policy challenges are not being addressed and regional telecommunications is not a priority.

Additionally, regulatory frameworks have not kept pace with the evolution of the telecommunications landscape. The current CSG framework does not reflect:

- the multi-technology, multi-provider environment now in place
- the increasing reliance on mobile and satellite services, including Low Earth Orbit (LEO) services
- the real-world experience of consumers in areas with limited or no competition, and in some cases no mobile coverage
- fault reporting processes, there are no adequate provider procedures to ensure consumers can report and track faults e.g. If a fault is reported by phone there is no record that the customer can access.
- broader changes in how people live, travel and access services across regional Australia
- the way consumers now use telecommunications services, including increased dependence on connectivity for critical and time-sensitive activities

- the need for redundancy and backup services, particularly as services converge onto single technology pathways

While reform remains stalled, consumers are being migrated at scale away from legacy services and onto alternative technologies, often without equivalent protections. This transition is occurring in plain sight, yet is not being adequately scrutinised or challenged by government, regulators or wholesale providers. There is a clear reluctance to address difficult issues or intervene where necessary, and a lack of Government and regulatory oversight, that is allowing systemic problems in regional telecommunications to persist while consumers carry the risk and consequences of poorly managed change.

Extending the CSG without urgent reform will only prolong outdated protections while gaps continue to widen for those most reliant on telecommunications services. The result is a continued erosion of consumer safeguards, increasing confusion and growing exposure to harm for already vulnerable communities.

BIRRR warns there is limited time to act. Consultation and reform processes are moving too slowly while real-world transitions continue at pace. Frustration across RRR communities is rising, and confidence in the system is eroding. The window to preserve existing protections and embed equivalent safeguards in replacement services is rapidly closing. The opportunity to get this right has almost passed. Without timely intervention, there will be real social, safety, economic and health consequences for RRR Australia, and the Government and regulators will not be able to claim they weren't warned.

Consultation Process and Timeframes

RRR communities and consumers are frustrated that repeated submissions, consultations and reviews are not being meaningfully acted on. This has contributed to a lack of confidence that consultation processes are genuinely influencing policy decisions. Lived experience continues to be gathered, but there is little evidence that it is being reflected in the actions that follow. It is becoming increasingly difficult to continue advocating on behalf of our members when their experiences are consistently ignored.

BIRRR has seen no meaningful improvement in consumer outcomes since the 2023 thematic review, highlighting a broader disconnect between consultation processes and policy outcomes and raising concern that engagement with stakeholders is becoming procedural rather than purposeful.

BIRRR is also concerned by the short consultation timeframe provided for the CSG extension proposal. The issues under consideration intersect with broader policy settings, including USO reform, Statutory Infrastructure Provider (SIP) obligations and ongoing technology transitions, and are being progressed alongside multiple concurrent telecommunications consultations.

RRR stakeholders, particularly those in geographically dispersed areas, require adequate time to gather lived experience, feedback and evidence. Compressed timeframes, such as the two weeks provided for this submission, disproportionately impact volunteer-led organisations such as BIRRR and limit the ability to provide meaningful input. If required and given the time to do so BIRRR is ready, willing and able to submit individual case studies that support this submission and demonstrate the lived experiences of our members.

Conclusion

BIRRR does not support the extension of the CSG instruments without a clear and time-bound commitment to broader USO reform. Extending the current framework in isolation will only entrench a legacy system that is no longer fit for purpose and increasingly disconnected from how telecommunications services are delivered and experienced across RRR Australia. Without an urgent commitment to USO reform and action on the systemic issues identified in this and previous submissions, extending the CSG risks further erosion of consumer protections and continued poor outcomes for those most reliant on essential telecommunications services.

For RRR consumers, these reviews and consultations are not theoretical. They directly impact safety, productivity, access to healthcare, social and mental wellbeing, education, business continuity and the ability to remain connected during emergencies. As services evolve and legacy networks are withdrawn, the absence of equivalent, enforceable protections across all technologies, combined with a lack of clear leadership and a coordinated national strategy, continues to leave RRR consumers exposed and at risk.

The focus must now shift from maintaining legacy instruments to delivering modern, technology-neutral protections and a clear plan, strategy and leadership that ensures all Australians, regardless of where they live, have access to reliable, resilient, affordable and supported connectivity.