

**National  
Farmers  
Federation**

**Rural and Regional Affairs and Transport  
References Committee**

# **Inquiry into the Shutdown of the 3G mobile network**

**June 2024**



# The National Farmers' Federation (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 breadth and the length of 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 represents Australian agriculture on national and foreign policy issues including workplace relations, trade and natural resource management. Our members complement this work through the delivery of direct 'grass roots' member services as well as state-based policy and commodity-specific interests.

## NFF Member Organisations



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## Executive Summary

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission to the Rural and Regional Affairs and Transport References Committee's (the Committee's) inquiry into the Shutdown of the 3G mobile network.

Australians must have accessible, reliable, cost-effective, resilient and quality connectivity outcomes. Such services are fundamental to everyday economic, social, health and educational outcomes, the importance of which is often heightened for those living outside of metropolitan areas. Australians living in regional, rural and remote areas require connectivity outcomes equal to their metropolitan counterparts.

While significant advances have been made in recent years, many regional Australians continue to face connectivity challenges. Service quality, reliability and accessibility issues remain, presenting ongoing primary connectivity barriers for regional Australians, farm businesses and workers.

Farmers and communities are understandably apprehensive about what the 3G network shutdown means for them. The 3G network has been a reliable lifeline for many consumers, but particularly those in rural and remote areas. The 3G network continues to provide a safety net during emergencies and natural disasters and many still consider it an essential component of reliable connectivity.

As mobile network providers (providers), Telstra and Optus, transition away from their 3G mobile networks, the NFF seeks to ensure that the transition and ultimate shutdown of 3G technology does not adversely impact Australian farmers, their communities and the broader regional, rural and remote population.

Our sector has critical expectations through which we will measure the success of the 3G network shutdown and transition period. These expectations include that:

### **1. Connectivity must be equivalent or improved**

The NFF supports improved connectivity outcomes for Australian farmers. We recognise that the shutdown of the 3G network presents the opportunity for enhanced connectivity across the country. Closing the 3G network will allow mobile network providers to repurpose the 3G spectrum to enhance 4G and expand 5G networks.

Telstra has publicly guaranteed that after the 31<sup>st</sup> of August 2024, equivalent coverage will be available in areas which were previously and primarily reliant on the 3G network. The NFF welcomes this commitment and will hold providers accountable to ensure that equivalent or improved coverage is delivered as of key shutdown dates.

### **2. Providers must prioritise accountability and transparency through the transition**

The NFF's sensible and supportive approach to the transition away from 3G technology is contingent on the delivery of equivalent or improved coverage for

regional, rural and remote areas. Providers will be held publicly accountable to their commitments as of key shutdown dates. The NFF expects continued transparency from providers, particularly in regard to their ability to deliver on their commitments.

Australian farmers and communities are placing significant trust in providers to ensure that the transition away from 3G technology is as seamless as possible. These communities are trusting providers with their continued ability to communicate, to conduct business and to access essential and emergency services if required. Providers must recognise that their actions during this transition period will significantly impact their relationship with these communities.

### **3. Proactive, robust and considered efforts are made to inform consumers and avoid adverse consequences**

The NFF calls on providers to take comprehensive measures to prevent unintended or adverse impacts of the 3G network shutdown. Proactive measures are critical to mitigate potential risks and ensure continuous service.

The NFF strongly supports the roll-out of targeted communication activities and tools to make it as easy as possible for consumers to access requisite information and confirm whether their device(s) or technology will be affected by network closures. Continued, overzealous and targeted support is more likely to safeguard communities from adverse consequences.

To facilitate a smooth transition, the NFF strongly supports direct, targeted communication initiatives through a diversity of channels. Providers should:

- Continue to raise awareness of available communication avenues, through which customers can raise concerns, report issues or find further information.
- Continue to improve user-friendly tools to help customers determine if their devices are affected and how to upgrade them if required.
- Provide ongoing support mechanisms for consumers and small businesses post 3G shutdown, including a coordinated communications strategy, to ensure any issues are promptly communicated and addressed.
- Establish dedicated 3G network shutdown communication and support channels, such as a hotline and e-mail address, available to consumers to report any issues or concerns specifically regarding the shutdown.

The Regional Tech Hub (RTH) continues to play a valuable role in transition, as an independent facilitator of critical information to regional stakeholders. The Committee should consider how to support and promote the work of the RTH, and the role of independent communication avenues through periods of major technology transition.

The NFF also acknowledges the onus on manufacturers and technology providers of impacted devices (beyond the major network providers) to inform consumers of foreseeable impacts.

**4. Post-network shutdown issues are addressed quickly and effectively**

Providers must ensure appropriate plans and support measures are in place to diagnose and effectively address any issues that arise post the network shutdown. The NFF expects providers to identify and respond to issues, communicate with stakeholders, and implement solutions as a matter of priority. We expect a communications and support plan that goes beyond business-as-usual activity. We must avoid any risk of lengthy processing times and build faith that issues can be heard and resolved quickly and effectively.

Regional connectivity barriers and challenges are long-standing and systemic. The transition must not further burden what is an already tumultuous system to the detriment of regional, rural and remote consumers.

**NFF Connectivity and Digital Agriculture Policy Statement**

**NFF policy position**

Connectivity is an essential service underpinning the economic, social, health and educational outcomes and opportunities of all Australians. This essential nature does not change with location, with all Australians entitled to accessible, reliable, quality and affordable connectivity services.

Advancements in connectivity play a central role in enabling the adoption of digital agricultural practices. Advancements in areas such as AgTech, digital intelligence and farm data must support positive outcomes for Australian producers.

**Context**

**Connectivity**

Australians place the utmost importance on accessible, reliable, affordable and quality connectivity services. Such services are fundamental to their everyday economic, social, health and educational outcomes, the importance of which is often heightened for those living outside of metropolitan areas.

While significant advances have been made in recent years, many regional Australians continue to face connectivity challenges. Service quality, reliability and accessibility issues remain, presenting ongoing primary connectivity barriers for regional Australians, farm businesses and workers. As economic activity and service delivery continue to migrate online, such accessibility challenges must be addressed. However improving connectivity in regional areas continues to present a fundamental opportunity to drive the competitiveness and productivity of the agricultural sector in the decades to come.

Continued advancements in connectivity continue to be an essential requirement to support Australian agriculture’s 2030 \$100 billion farm-gate revenue aspiration. Recent years have seen an acceleration in the importance of connectivity services and changes to the connectivity landscape.

The 2021 Regional Telecommunications Review identified a “step change in the demand for telecommunications” with a new paradigm in the essential nature of

connectivity to everyday lives as well as being essential to underpinning the opportunities that exist in the ever-digitising economy now more than ever.<sup>1</sup>

Furthermore, recent years have seen a number of material developments within the regional connectivity landscape. Publicly funded investment schemes have experienced a period of sustained bi-partisan support, with programs maturing and the co-investment incentives for mobile operators diminishing. Regional telecommunication infrastructure markets have undergone significant ownership changes, with historical integrated models of ownership being replaced by third party infrastructure owners. Finally, and perhaps most significantly, the ongoing advancement of technological solutions, such as satellite-delivered connectivity, has resulted in potential material changes to how connectivity services may be delivered, particularly to those in Australia in more rural and remote areas.

### **Digital Agriculture**

Connectivity and digital agriculture are intrinsically linked, with connectivity advancements underpinning the adoption of digital agricultural practices. As connectivity continues to advance, the growth of digital agriculture in areas such as automation, digital intelligence and farm data will present growing opportunities and risks for producers. Continually improving connectivity services are key to materialising the estimated \$20 billion AgTech opportunity.<sup>2</sup>

Digitising agriculture will be critical to unlocking key markets, increasing sustainability, efficiency and productivity. These opportunities are rapidly evolving and offer numerous potential benefits to producers and the sector more broadly.

However, as digital agriculture continues to ever grow in importance, the associated risks are also heightened. Issues of access, privacy and safety surrounding the use of personal and farm data are increasing in risk for producers. Moreover, the increased automation of farming practices and digital-intelligence services will require additional policy considerations.

Given these emerging issues surrounding producers' data, the NFF's 2030 roadmap identified the need to ensure farmers have appropriate control of their data and the value derived from it. In 2020, the NFF developed the Australian Farm Data Code to address fairness and privacy in the collection, use, and sharing of producers' data.

Going forward, it is imperative that further considerations are given to the risks and opportunities associated with the digitisation of agriculture that will increasingly arise in the coming decade to ensure they support positive outcomes for Australian producers.

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<sup>1</sup> Regional Telecommunications Review, 2021, 2021 Regional Telecommunications Review - A step change in demand, Pg 1.

<sup>2</sup> Department of Agriculture and Water Resources, 2017. Accelerating precision agriculture to decision agriculture: Enabling digital agriculture in Australia. Cotton Research and Development Corporation, Australia



## Principles

We ask the Committee to consider relevant principles from the NFF's policy statement, including:

1. All Australians must have accessible, reliable, cost-effective, resilient and quality connectivity outcomes.
2. Policy and regulatory settings should support a pro-competitive regional connectivity market that fosters continual service competition and innovation in order to deliver connectivity outcomes.
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.
4. Connectivity services are an essential requirement to support Australian agriculture to achieve its 2030 \$100 billion farm-gate revenue target, in particular the ongoing adoption and uptake of AgTech solutions.
5. Connectivity services are critical to the safety of all Australians during and after periods of natural disasters.
6. Connectivity literacy is an integral element of ensuring all Australians can effectively access and utilise connectivity services, and fully participate in the digital economy, including AgTech adoption.
7. Farm data must be subject to best practices surrounding its collection, use, control, and sharing.
8. Connectivity, digital, and other technology advancements should lead to positive production, privacy and safety outcomes for producers.
9. The rapidly and ever-changing nature of the regional connectivity environment necessitates ongoing review of contemporary policy, market and technology settings.

## Priority initiatives to deliver on the principles

We ask the Committee to consider the following priority initiatives to deliver on the principles:

- **3G shutdown and 5G transition (Principle 1, 4 & 8):** The NFF should work with government, members, partners and industry participants to ensure the shutdown of 3G, ongoing role of 4G and rollout of 5G networks lead to positive connectivity outcomes.
- **Ongoing investment programs in connectivity infrastructure (Principle 1, 2, 3 & 5):** The NFF supports ongoing public funding of investment programs to ensure the delivery of connectivity service expansion and quality improvements. Program design must consider the ongoing advancement of



technological solutions, such as satellite-delivered connectivity and in-field connectivity solutions

- **Investment in network resilience (Principle 1 & 5):** Ongoing investment must be made in network resilience programs in order to better support service continuity during periods of natural disaster.
- **Audit of regional mobile coverage & performance (Principle 1):** Funding should be provided to undertake an investigation and audit of mobile coverage & performance across regional Australia. This should include the reporting of experienced congestion levels.

## Our sector's expectations

Australians must have accessible, reliable, cost-effective, resilient and quality connectivity outcomes. Connectivity services are essential to safety, productivity and wellbeing.

As mobile network providers transition away from the 3G network, the NFF seeks to ensure that the transition period and ultimate shutdown of 3G technology does not adversely impact Australian farmers and the broader regional, rural and remote population.

All Australians should have access to and benefit from technological advancements. However, the transition to 4G and 5G technologies must hold regional, rural and remote communities front of mind. The importance of the mobile network can be heightened for those living outside metropolitan areas, as a requisite to everyday economic, social, health and educational outcomes. With existing primary connectivity barriers, including a strong reliance on the 3G network in some areas, it is these communities that will invariably suffer the lion's share of adverse consequences through the transition.

With this context, our sector has critical expectations of providers and government as we near critical shutdown dates. These expectations are outlined below.

### Connectivity must be equivalent or improved

The NFF supports improved connectivity outcomes for Australian farmers. We recognise that the shutdown of the 3G mobile network presents the opportunity for enhanced connectivity across the country. Closing the 3G network will allow mobile network providers to repurpose the 3G spectrum to enhance 4G and expand 5G networks.

Telstra has publicly guaranteed that when they shutdown their 3G network on the 31<sup>st</sup> of August 2024, equivalent mobile coverage will be available in areas which were previously and primarily reliant on the 3G network. The NFF welcomes this commitment and will hold providers accountable to ensure that equivalent coverage is delivered as of key shutdown dates.

Continuity through the transition is of critical concern to the NFF and Australian farmers. Reliable mobile connectivity underpins modern agriculture, enabling

efficient farm management, market access and daily business operations. In rural and remote areas, health and safety is often intrinsically tied to connectivity. Connectivity allows access to the benefits of telehealth, emergency responses in isolated situations and communication during natural disasters. For those living outside of metropolitan areas, there may also be a stronger reliance on connectivity for education, social and wellbeing outcomes. The industry and communities cannot afford any lapse or degradation in service during the transition from 3G to newer technologies.

### **Providers must prioritise accountability and transparency**

Farmers and their communities are understandably apprehensive about what the 3G network shutdown means for them. The 3G network has been a reliable lifeline for many communities, particularly those in rural and remote areas. It provides a safety net during emergencies and natural disasters. Many still consider it an essential component of reliable connectivity.

Hence, Australian farmers and communities are placing significant trust in providers to ensure that the transition away from 3G technology is as seamless as possible. These communities are trusting providers with their continued ability to communicate, to conduct business and to access essential and emergency services if required. Providers must recognise that their actions during this transition period will significantly impact their relationship with these communities.

As outlined above, the NFF's sensible and supportive approach to the transition away from 3G technology is contingent on the delivery of equivalent or improved coverage for regional, rural and remote areas. Providers will be held accountable to these commitments as of key shutdown dates.

Transparency and consistent communication are equally critical to a successful transition with minimal adverse impacts. If providers are concerned about their ability to meet their commitments, we expect them to be transparent and communicate with impacted consumers and communities as early as possible. The NFF further expects providers to continue to disclose any risks or critical information on a continuous basis, this includes any potential service disruptions, changes to coverage areas or circumstances, and potentially impacted devices.

We acknowledge the transparency and communication between providers, their customers and regional, rural and remote stakeholders (including the agriculture industry) to date. We ask providers to build upon these efforts as shutdown dates approach.

### **Proactive, robust and considered efforts are made to inform consumers and avoid adverse consequences**

The NFF calls on providers to take comprehensive measures to prevent unintended or adverse impacts from the 3G network shutdown. Proactive measures are critical to mitigate potential risks and best ensure continuity of service.

Providers have the primary responsibility to ensure that their customers understand what the shutdown means for them. The NFF strongly supports the roll-out of targeted communication activities and support tools to make it as easy

as possible for consumers to access requisite information and confirm whether their device(s) or technology will be affected by network closures.

We acknowledge the work of providers to date to inform consumers and address potential adverse consequences from the network shutdown, including that:

- Telstra has extended their deadline to switch off their 3G network to 31 August 2024, to allow consumers additional time to update affected devices.
- Telstra and Optus have assured the NFF and our members that they are reaching out to customers who they understand will be impacted by the shutdown (via phone, email, letter and/or SMS).
- Currently, Telstra is playing a short 10-second message before all outgoing calls on all 3G impacted mobile devices. This message cannot be removed until the service has been updated. The message won't play if it's a triple zero call.
- Both Telstra and Optus customers can access a SMS Device Checker which allows consumers to confirm if their mobile device is 4G compatible.
  - Text '3' to 3498. You will receive a text back outlining your compatibility and any next steps.
- Telstra and Optus have published numerous fact sheets and other resources to guide customers through the transition.
- These national activities are in addition to grassroots engagement activities.

However, communications and support channels can still be improved.

Continued, overzealous and targeted support is more likely to safeguard communities from adverse consequences. To facilitate a smooth transition, the NFF strongly supports direct, targeted communication initiatives through a diversity of channels. Providers should:

- Continue to raise awareness of available communication avenues, through which customers can raise concerns, report issues or find further information.
- Continue to improve user-friendly tools to help customers determine if their devices are affected and how to upgrade them if required.
- Provide ongoing support mechanisms for consumers and small businesses post 3G shutdown, including a coordinated communications strategy, to ensure any issues are promptly communicated and addressed.
- Establish dedicated 3G network shutdown communication and support channels, such as a hotline and e-mail address, available to consumers to report any issues or concerns specifically regarding the shutdown.

The NFF continues to hear anecdotal reports that network service is shifting or diminishing in certain areas in the lead up to the shutdown. This could be attributed to a variety of reasons, such as a genuine issue, the result of arbitrary constraints on 4G service until the 3G network is shutdown, or a false impression of service indicators (bars on phones for example). Regardless of the cause, farmers and consumers need a quick and easy way to raise these concerns directly with providers. This will enable any issues to be addressed and consumers to be informed.

Furthermore, industry continues to actively support the work of providers to ensure farmers and their communities are informed and prepared. We acknowledge that we also have a role to play in facilitating communication to our members and concerned communities.

The Regional Tech Hub (RTH) continues to play a valuable role in transition, as an independent facilitator of critical information to regional stakeholders. The RTH has been inundated with requests for information on the 3G shutdown from regional, rural and remote consumers. In response to this intense interest, the RTH has collated relevant information and developed a series of targeted resources to assist stakeholders to understand how the transition may impact them. Resources include a webpage, stakeholder information toolkit, fact sheets, flyers, social media posts and webinars. The NFF and our members continue to share resources regarding the 3G network transition.

The Committee should consider how to support and promote the work of the Regional Tech Hub, and the role of independent communication avenues through periods of major technology transition.

Finally, all manufacturers and technology providers must notify customers of all devices which will be impacted by the shutdown impacted devices, beyond mobile phones or devices sold by Telstra and Optus.

There will undoubtedly be devices that consumers don't realise run on 3G exclusively until after the network is shutdown. As an example, farmers have expressed concerns about remote water trough monitoring and farm surveillance systems. We have encouraged farmers to speak to their technology provider if they are concerned, but to avoid adverse consequences, we require these providers to be actively communicating any issues to their customers.

### **Post-network shutdown issues are addressed quickly and effectively**

The NFF will hold providers accountable to their commitments to deliver equivalent service as of key shutdown dates. However, providers must ensure appropriate plans and support measures are in place to diagnose and effectively address any issues. The NFF expects providers to identify and respond to issues, communicate with stakeholders, and implement solutions as a matter of priority.

Regional connectivity barriers and challenges are long-standing and systemic. The transition must not further burden what is an already tumultuous system to the detriment of regional, rural and remote consumers.

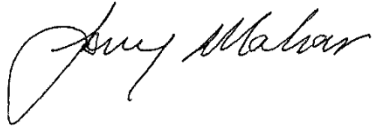
As outlined above, a diverse series of two-way communication channels should be established ahead of the shutdown, to allow prompt diagnosis of any unexpected issues or misinformation.

The critical point is that we expect an approach to shutdown related issues above and beyond business-as-usual. We must avoid any risk of lengthy processing times and build faith that issues can be understood and resolved quickly and effectively.

The NFF is committed to advocating for positive connectivity outcomes for Australian farmers and rural communities through the 3G network shutdown. We thank the Committee for the opportunity to provide input to the inquiry. The

policy contact for this matter is Miss Charlotte Wundersitz, General Manager of Rural Affairs, via e-mail: [cwundersitz@nff.org.au](mailto:cwundersitz@nff.org.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read "Tony Mahar". The signature is fluid and cursive, with a large initial 'T'.

**TONY MAHAR**  
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