**Proposal to vary the Telecommunications Numbering Plan 2015 – Submission from Symbio**

|  |  |
| --- | --- |
| **Initiative** | **Comments** |
| **7226 Short Code** | **Support.** We agree to the use of short code7226 as a shared special services number for community services purposes. It is agreed that it should not be mandatory but rather an additional tool to disrupt scams. Incoming international access should not be available as it is for reporting scams within Australia. |
| **Limiting Freephone, Local Rate and Premium Rate numbers from being used as CLI** | **Support.** We support this initiative as it aligns the Numbering Plan with a requirement already in the Scam Code C661 |
| **Registration of CSP’s in the Numbering System** | **Disagree.** CSP’s can more efficiently manage the numbers allocated to them without needing potentially costly and disruptive changes to the Numbering System. Although some CSP’s are already registered in the Numbering System, there are many more that are not currently registered. Further, we don’t see how registration in the Numbering System would achieve the stated objective of reducing scams.  Note that Symbio CSP customers are all required to apply to the IPND Manager for a unique CSP/Data Provider code before we will issue numbers to them.  If the regulators judge there is there is a requirement to register all CSP’s, we believe it should be more broadly based and not specific to the Numbering Plan |
| **Should the Numbering Plan limit the number of times a number can be assigned to another CSP on the same network** | **Disagree.** Don’t see any need for this. These are commercial arrangements managed by CSP’s who keep records of who they have assigned numbers to so that they can effectively manage their business and their number supply |
| **Should the Numbering Plan restrict entities which can be assigned numbers to Australian Businesses** | **Disagree**. Many global telecommunications organisations that don’t necessarily have a local address have a requirement to use Australian numbers. We are seeing more and more larger multinationals wanting to operate here without a physical presence in the country. These situations are becoming more prevalent as the use of cloud infrastructure grows and Australia needs to provide an environment where such companies can provide advanced services to Australian customers.  Note that the IPND Manager has agreed that businesses outside Australia can apply for a CSP Code. They must have an email address but do not need to have a business address in Australia. |

|  |  |
| --- | --- |
| **Power to Withdraw Numbers used for Scams** | **Disagree.** If the ACMA is concerned that a number is being used for scams it should request the appropriate CSP’s to take action as covered in the Scam Code. As scammers move from number to number quite often, it may no longer be appropriate to withdraw a number by the time the process proposed by the ACMA is actioned. Hence, we believe this process would just add complexity to the management of numbers without reducing scams.  Further, there is the matter of spoofed numbers being used for scams and the potential impact on end users if their numbers are withdrawn and then need to be re-activated |
| **Decrease the Size of Standard Unit of Numbers** | **Support**. We support the decrease of the standard unit size for mobile numbers from 100,000 to 10,000 and to maintain standard unit sizes. Smaller CSP’s are likely to make use of this capability as this will provide more flexibility in the allocation and transfer of these numbers. Current network systems can cope with this reduced size without additional cost as it is a standard well-established process.  We have no comment on premium rate numbers. |
| **Remove Location Independent Communications Services Numbers (0550)** | **Support**. These numbers have not been used and should be withdrawn leaving the way for this range to be used for mobile numbers in the future |
| **Notice Period for Withdrawal and Replacement of Numbers** | **Support**. We agree to reducing the notice period from 1 year to 90 days as there is no longer the need to update paper directories |
| **Availability of Geographic Number Ranges in Certain Areas** | **Support.** Forward planning where numbers are running short is important and we appreciate the ACMA activity in this regard. |
| **Proposed Changes to Objects and Definitions in the Numbering Plan** | **Support.** We agree to the proposed changes to the Objects and Definitions for consistency with other regulations.  **Disagree.** We don’t agree to the consequential changes proposed to the Number Plan as a result of changes we disagree with in earlier sections of our response. This covers Section 87A (2), (3), (4), and (5), Section 92A and 127(qa) |