OPTUS

Submission in response to Australian Communications and Media Authority

Consultation Paper

Proposal to vary the Telecommunications Numbering Plan 2015

4 November 2022

PROPOSED CHANGES

1. Optus welcomes the opportunity to provide feedback on the Australian Communications and Media Authority's (ACMA) draft *Telecommunications Numbering Plan Variation 2022 (No.1)* (the draft variation) and consultation paper: *Proposal to vary the Telecommunications Numbering Plan 2015*.

2. The ACMA has proposed three main areas for amendment to the Numbering Plan. These include:

    (a) Supporting scam disruption initiatives;

    (b) Enabling efficient allocation of numbers; and

    (c) Specifying availability of geographic numbers in certain areas.

3. Optus discusses each of these below, including responses to specific questions in the consultation where appropriate.

Initiatives to support scam disruptions

4. Phone scamming activities have long been a blight on the positive experience of mobile customers. Scam activity is increasingly sophisticated and hard to detect, with the scale and effect of the activity resulting in a significant social and economic impact on Australians. Disruption of scam activities through industry-wide scam reduction initiatives, among other things, remains a key focus of telecommunication industry and government stakeholders working together to address the problem.

5. Work on these initiatives to disrupt phone scam activities continue to be developed and supported by a range of industry codes and guidelines and contractual arrangements between CSPs. For example, new rules are in force that require CSPs to use multifactor identification on a range of customer transactions targeted by scammers. There are also new obligations in force requiring CSPs to identify and block scam calls and texts.

6. The ACMA proposes to amend the Numbering Plan to clarify the rules for the allocation, transfer, surrender, portability and use of different types of numbers for carriage services. Specifically, changes are proposed for the use of certain numbers to support spam disruption initiatives and disrupting methods used by scammers.

7. The ACMA also proposes to introduce a new limited power to withdraw a number if there are reasonable grounds to believe it has been used in association with a scam communication or other fraudulent activity. This would be in addition to their current powers to withdraw numbers under other circumstances.

8. These are further discussed below.

Specification of 7226 (SCAM) short code

Q1.1. Do you support these initiatives? Why? Why not?

9. Optus supports the proposal to specify 7226 as a specific single short code to enable CSP customers to report scam texts to their provider for investigation and action. Optus further notes that this was an agreed industry initiative.

10.   In addition, the use of the 7226 code should also be subject to minimal cost barriers on carriers to ensure positive take-up by end-users.

Q1.2. Is there any specific cost or burden in relation to the proposals? If so, please provide specific detail against each relevant item.

11.   Given use of the 7226 code is an on-net solution, intended to allow customers to only forward and report the original scam texts to their CSP, it is likely that any cost incurred would be CSP specific.

12.   **[CiC Begins] [CiC Ends]**

Q1.3. If you are a carriage service provider (CSP), will you promote the use of the 7226 (SCAM) code to your customers?

13.   **[CiC Begins] [CiC Ends]**

Q1.4. Should 7226 be classified as a community service?

14.   A community service is defined in the numbering plan as a carriage service providing access to information or assistance of significant community value. Optus supports the classification of 7226 as a community service.

Q1.5. Should incoming international access be available for 7226?

15.   Restricting incoming international access means that the special number may not be used in connection with the supply of a carriage service that routes an incoming call from outside Australia to the number. Optus considers that where spam SMs originate from international numbers, any reporting of these SMs should be permitted at the carrier's discretion.

Q1.6. Should 7226 be classified as a low charge number?

16.   Optus considers that use of this short code should be subject to nil charge to ensure it does not provide any cost barriers to end users wishing to use this service to report scams to their network provider.

Q1.7. Should 7226 be classified as a selectable number?

17.   We agree with the ACMA that 7226 should be designated as not a selectable number. Under the current proposal, its specification as a shared number is sufficient to allow its use by a carriage service provider without being allocated. This also enables CSPs the optionality to determine if they provide the number to their customers for use, and how the resulting data is used to identify and act on scams.

18.   As noted above, given 7226 code is to be considered an on-net solution but common across all networks, each carrier will therefore need to establish their own collection and reporting system for 7226 return SMs originating from their network.

Limiting freephone, local rate and premium rate numbers

Q1.8. Are there any reasons (for example, legitimate use-cases) to allow outbound calls using freephone, local rate and premium numbers?

19.   Optus supports the proposal to amend the definition of freephone, local rate and premium rate numbers under section 15 of the Numbering Plan to only enable its use for inbound calls.

20.   This would support the work already undertaken by Communications Alliance in the development of the industry code *C661:2022 Reducing Scam Calls and Scam SMs*, which prohibits a C/CSP from sending calls where 13/1300/1800/1900 Australian Numbers are being used as an A-Party CLI, thereby recognising there are no legitimate cases for outbound calls to use these numbers.

Registration in the Numbering System

21.   Optus' views on registration in the Numbering System are in line with the comments set out in the Communications Alliance submission to this consultation.

22.   In general, we consider there appears little justification that requiring mandatory registration as a precondition to being assigned numbers on the same network will result in increased transparency or a reduction in misuse of numbers by scammers over and above information which is already available to the ACMA.

Q1.9. Are there any reasons CSPs shouldn't be registered as a precondition to being assigned numbers on the same network?

23.   We support the position proposed by Communications Alliance that it is not clear whether registration of CSPs will assist reduce the operations of scammers.

Q1.10. Under proposed transitional arrangements, is 90 days from commencement of registration provisions sufficient time for CSPs that have been assigned numbers to register?

24.   We support the position proposed by Communications Alliance that is it is not clear whether 90 days would be sufficient time to identify the CSP and notify it of its obligations.

Q1.11. Is between 90 to 180 days sufficient time for donor CSPs to check the registration status of CSPs that have been assigned numbers?

25.   As above, we support the position proposed by Communications Alliance.

Q1.12. Should the numbering plan limit the number of times a number can be provided to another CSP under contractual arrangements (that is, assign the number) outside the Numbering System?

26.   No, we believe this is unnecessary and support the position proposed by Communications Alliance.

Q1.13. Should the numbering plan restrict entities which can be assigned numbers to Australian businesses?

27.   No, we support the position proposed by Communications Alliance.

Power to withdraw numbers used for scams

Q1.14. In deciding whether to withdraw numbers used for scam or fraudulent purposes, what should the ACMA consider?

28. The ACMA proposes to introduce a new limited power to withdraw a number if there are reasonable grounds to believe it has been used in association with a scam communication or other fraudulent activity. This would be in addition to their current powers to withdraw numbers under other circumstances, such as inconsistency with conditions in the numbering plan and non-payment of annual numbering charges.

29. While Optus notes in principle support for any proposal to reduce the impacts of scams on our customers, it remains unclear how the practicalities of this process would operate and how such mechanisms would deviate from the current obligations on carriers. As set out in the Reducing Scam Calls and Scam SMs Code, CSPs are already required to investigate and disconnect A-party numbers where it has been found to be involved in scam activities.

Efficient allocation of numbers

Decrease the size of standard unit of numbers

Q2.1. Do you support these initiatives? Why? Why not?

30. Optus supports the proposal to decrease the size of a standard unit for premium rate numbers and mobile numbers that may be allocated via the Numbering System from 100,000 to 10,000. Optus welcomes the improved flexibility afforded by the reduced size of number blocks. This will enable greater efficiency and flexibility in the allocation or transfer of numbers by C/CSPs, particularly for allocation of numbers to large clients or for sub allocations of numbers allocated to a CSP for specific uses.

Q2.2. Is there any specific cost or burden in relation to the proposals? If so, please provide specific detail against each relevant item.

31. From the assessment made by Optus, we see no significant cost or processes impacts in making the necessary software changes to condition the network for 10,000 number blocks.

Q2.3. If you are a CSP, do you anticipate you will be more likely to apply for an allocation of numbers, or a transfer of numbers, via the Numbering System if standard unit sizes are reduced to 10,000 number blocks?

32. Optus notes the improved flexibility afforded by the reduced size of number blocks. However, impacts on the likely take up of this change will depend on commercial or other arrangements recognising the greater efficiency in the allocation or transfer of numbers by C/CSPs.

Q2.4. Noting we anticipate changes will be made to the Numbering System by the end of March 2023, will CSP systems be able to accept 10,000 number blocks by that time? If CSPs expect they will need longer, would a possible workaround be to apply for allocation of 10 x 10,000 number blocks in each transaction? Would this create additional costs?

33. **[CiC Begins] [CiC Ends]**

Q2.5. Are there any disadvantages to requiring transfers of numbers to occur in standard unit sizes under the numbering plan, noting this is already standard practice in the Numbering System?

34. As noted above, Optus supports the reduced size of number blocks being introduced.

Location independent communications services

> Q2.6. Are there any reasons to retain location independent communications services (LICS)?

35. Optus does not consider there are any reasons to retain LICS using the 0550 number range to be retained at this stage.

Notice period for withdrawal and replacement of numbers

36. Optus' views on the notice period for withdrawal and replacement of numbers are in line with the comments set out in the Communications Alliance submission to this consultation.

> Q2.7. Do you support decreasing the notice period CSPs must give customers before recalling or replacing a number? Please specify why or why not.

37. Yes, we support the position proposed by Communications Alliance.

> Q2.8. Is 90 business days sufficient to allow customers, including small business owners, to make necessary changes to accommodate a new number?

38. Yes, we support the position proposed by Communications Alliance.

Availability of geographic number ranges in certain areas

39. Optus' views on the availability of these numbers are in line with the comments set out in the Communications Alliance submission to this consultation which, while noting the ACMAs view that the new prefixes will not be made available until current allocations in these areas are exhausted and requests the use of existing number resources be reviewed before determining whether new number ranges are required.

> Q3.1. Do you support these initiatives? Why? Why not?

40. As indicated above, we support the position proposed by Communications Alliance.

> Q3.2. Is there any specific cost or burden in relation to the proposals? If so, please provide specific detail against each relevant item.

41. Costs will vary amongst CSPs and include network conditioning and IT systems costs. However, we do not think these costs will be onerous.

Other amendments

> Q4.1. Do you have any comments about the proposal to remove the objects?

42. Optus supports the proposed removal of the objects from the numbering plan. This will enable greater alignment of the numbering plan with the Telecommunications Act.

> Q4.2. Do you have any comments about the proposed changes to definitions?

43. Optus supports the proposed changes to definitions to provide consistency with other related obligations and instruments.