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## Submission

Manager  
Numbers Section  
Australian Communications and Media Authority  
PO Box 13112  
Law Courts  
Melbourne VIC 8010

### **Re: Amending the Telecommunications Numbering Plan 2015**

The Australian Communications Consumer Action Network (ACCAN) thanks the Australian Communications and Media Authority (ACMA) for the opportunity to provide feedback on the Amending the Telecommunications Numbering Plan 2015 consultation (The Numbering Plan).

ACCAN is the peak body that represents consumers on communications issues including telecommunications, broadband, and emerging new services. ACCAN provides a strong unified voice to industry and government as consumers work towards communications services that are trusted, inclusive and available for all.

ACCAN supports the amendments to the numbering plan, including:

- The introduction of the 7226 Scam Short Code to provide consumers and industry with a means to report scam texts and calls.
- Granting the ACMA extended powers to withdraw numbers that it believes to have been associated with scam communications.

ACCAN is supportive of the proposals to disrupt scams, changes to allow the withdrawal of numbers associated with scams and specifying the availability of geographic numbers in certain areas. The proposed measures will promote a safer telecommunications environment for consumers.

ACCAN recommends that the 7226 Scam Short Code be classified as a community service. We consider that consumers should not be burdened by any cost associated with the use of the Scam Short Code, as imposing a cost on consumers for using the code is likely to reduce its usage and therefore efficacy.

ACCAN does not support decreasing the notice period Carriage Service Providers (CSPs) must give customers before recalling or replacing a number. ACCAN does not believe that 90 days is an appropriate timeframe to allow consumers, including small business owners, to make necessary changes to accommodate a new number.

Many small businesses rely on their phone number as a primary point of contact for their customers. Small businesses' marketing and advertising often directly refers to their phone number and their business number can have significant recognition among their customers. If the notice period is

shortened, small business owners may lose customers or be unable to adequately notify their customers of a change in their primary point of contact.

Shortening the notice period increases the risk that inadvertent non-compliance by CSPs may have material impacts on small business. ACCAN is concerned that the proposed amendment will shift the economic risk of non-compliance to small businesses, who may not have the technical literacy and knowledge to engage with the numbering system to resolve issues in a timely fashion. ACCAN recommends that the notice period for CSPs remain one year to allow consumers and small businesses sufficient time to adapt to numbering changes.

We thank the ACMA for the opportunity to provide this submission and look forward to further engagement with the ACMA on the proposed amendments to the Numbering Plan. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact me at [Con.Gouskos@accan.org.au](mailto:Con.Gouskos@accan.org.au)

Yours sincerely,

Con Gouskos  
Policy Officer  
Australian Communication Consumers Action Network

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*The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers.*

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