

24 October 2022

The Manager
Numbers Section
Australian Communications and Media Authority

By email: numbering@acma.gov.au

To the Manager,

Proposal to vary the Telecommunications Numbering Plan 2015

Vocus has been actively engaged in efforts to reduce scam calls and welcomes the opportunity to provide feedback on the ACMA's proposed further initiatives to support scam disruption.

Limiting freephone, local rate and premium rate numbers

Vocus agrees that the numbering plan should be amended to align with the Reducing Scam Calls and Scam SMS Industry Code so that freephone, local rate and premium rate numbers can only be used for inbound calls. Vocus does not see any legitimate use cases to allow outbound calls using these numbers.

Registration in the Numbering System

Vocus notes the proposal that CSPs should be registered in the Numbering System before they can be assigned a number will be a significant change to our processes and will require timely and clear information from the ACMA on what is involved to enable the necessary changes to be made.

90 to 180 days is sufficient time for donor CSPs to check the registration status of CSPs that have been assigned numbers.

Vocus does not agree with an approach that would restrict entities that can be assigned numbers to Australian businesses or limit the number of times a number can be provided to another CSP under contractual arrangements. We do not see any valid reason for such limitations.

Power to withdraw numbers used for scams

This power could be very disruptive to individuals or businesses using the number in question who are not engaging in scam activity. Withdrawing numbers will also break number blocks and impact number allocations and porting. Accordingly, in deciding whether to withdraw numbers used for scam communications or other fraudulent purposes, the ACMA must be satisfied that the number in question has

Level 10, 452 Flinders Street,
Melbourne, VIC 3000

1300 88 99 88
info@vocus.com.au

vocus.com.au

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not been spoofed or over-stamped. The scam example must be proven to come from the CSP that owns the range and the end customer that the number is assigned to.

Please let us know if you would like to discuss any of these matters further.

Yours sincerely

A handwritten signature in blue ink that reads "Leanne O'Donnell". The signature is written in a cursive style and is centered within a light blue rectangular box.

Leanne O'Donnell
GM - Regulatory Affairs

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Melbourne, VIC 3000

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vocus.com.au

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