

COMMUNICATIONS
ALLIANCE LTD



**ACMA Consultation 32/2022: Amending the
Telecommunications Numbering Plan 2015**
COMMUNICATIONS ALLIANCE SUBMISSION
NOVEMBER 2022

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INTRODUCTION

Communications Alliance welcomes the opportunity to provide this submission in response to the Australian Communications and Media Authority (ACMA) consultation 32/2022: *Amending the Telecommunications Numbering Plan 2015*.

Members of Communications Alliance may make individual submissions.

For any questions relating to this submission please contact James Duck on 02 9959 9132 or at j.duck@commsalliance.com.au.

About Communications Alliance

Communications Alliance is the primary telecommunications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including carriers, carriage and internet service providers, content providers, equipment vendors, IT companies, consultants and business groups.

Its vision is to be the most influential association in Australian communications, co-operatively initiating programs that promote sustainable industry development, innovation and growth, while generating positive outcomes for customers and society. The prime mission of Communications Alliance is to create a co-operative stakeholder environment that allows the industry to take the lead on initiatives which grow the Australian communications industry, enhance the connectivity of all Australians and foster the highest standards of business behaviour. For more details about Communications Alliance, see <http://www.commsalliance.com.au>.

SUMMARY

Please refer to the following sections for responses to the questions posed by ACMA in its consultation paper *Proposal to vary the Telecommunications Numbering Plan 2015*.

In summary, Communications Alliance supports the proposed:

- Specification of 7226 for reporting scams.
- Limiting of freephone, local rate and premium rate numbers to inbound calls only.
- Removal of location independent communications services.
- Changes to the notice period for the withdrawal and replacement of numbers.
- Changes to remove the objects and align its interpretation directly with the relevant objects of the Telecommunications Act 1997.
- Changes to definitions to provide consistency with other obligations, including changes to other legislation.

On other topics raised in the consultation there is more than one industry view on them, or it is unclear why some of the proposed changes would be beneficial.

Section 1

Initiatives to support scam disruption

No.	Question	Response
1.1	Do you support these initiatives? Why? Why not?	Yes. Communications Alliance members proposed the specification of 7226 for reporting scams.
1.2	Is there any specific cost or burden in relation to the proposals? If so, please provide specific detail against each relevant item.	Communications Alliance members report that any cost would be network or CSP specific. A Carrier planning to configure its network to support 7226 expects costs will not be prohibitive.
1.3	If you are a carriage service provider (CSP), will you promote the use of the 7226 (SCAM) code to your customers?	Communications Alliance notes CSPs may have differing approaches to implementation of the 7226 code.
1.4	Should 7226 be classified as a community service?	Yes.
1.5	Should incoming international access be available for 7226?	CSPs would like to be able to exercise individual discretion on whether to allow incoming international access for short messages (SMS) to 7226. Arguments in favour of incoming international access include it would allow Australian outbound international roamers (i.e. customers outside Australia) to report scams. Arguments against incoming international access include: (i) The primary intention for 7226 is to report scams in Australia. (ii) To allow incoming international access to 7226 permits a risk of malicious high-volume messaging from outside Australia.
1.6	Should 7226 be classified as a low charge number?	Yes, or nil/no charge so there is a minimal or no cost barrier to end users reporting scams.
1.7	Should 7226 be classified as a selectable number?	No. It is important that people who receive scam communications report the originating number of the scam communication to their own CSP so the CSP can investigate and take appropriate action on its own. If 7226 was classified as selectable there is a risk customers could report received scam SMS to another CSP.
	Limiting freephone, local rate and premium rate numbers	
1.8	Are there any reasons (for example, legitimate use-cases) to allow outbound calls using freephone, local rate and premium numbers?	No. Clause 4.2.4 in the registered C661:2022 Reducing Scam Calls and Scam SMS Industry Code (and previously clause 4.2.8 in C661:2020) prohibits a Carrier or CSP from sending calls where 13/1300/1800/1900 Australian Numbers are being used as an A-Party CLI.

No.	Question	Response
		As noted in the ACMA paper " <i>Communications Alliance members have indicated that there is no legitimate case for outbound calls to use these numbers.</i> "
	Registration in the Numbering System	
1.9	Are there any reasons CSPs shouldn't be registered as a precondition to being assigned numbers on the same network?	<p>Yes.</p> <p>It is unclear how registration in the Numbering System of CSPs that are not allocated numbers will assist in preventing the misuse of numbers by scammers.</p> <p>If there is a necessity to register CSPs it should be done more broadly rather than just within the Numbering System.</p> <p>For example, one CSP that is allocated numbers and then assigns numbers to other CSPs requires all these CSPs to register with the IPND.</p> <p>Concerns about the proposed registration of a CSP (in the Numbering System, as a precondition to being assigned numbers outside the Numbering System, on the same network) include:</p> <p>(i) the <i>Number Management: Use of Numbers by Customers</i> Industry Code requires a CSP that assigns a Number to another CSP outside the Numbering System to maintain a record. Therefore if the Numbering System records the original allocation to the CSP holding the number(s) and the CSP keeps a record of subsequent assignment of the number(s) to a different CSP then there is no need for that different CSP to register in the Numbering System.</p> <p>(ii) There may be number(s) assigned to a CSP that serves enterprise or government clients only, and the CSP does not supply services to consumers. The proposed registration in the Numbering System would capture such CSPs, creating additional costs with little or no benefit towards the goal stated in the paper of "<i>preventing the misuse of numbers by scammers</i>", given scammers typically target consumers.</p> <p>(iii) CSPs holding numbers can more efficiently manage the numbers without additional ACMA activity or a need to use the Numbering System. For example, numbers can be disconnected and quarantined as required without ACMA involvement.</p> <p>(iv) It is unclear what costs would need to be recovered by ACMA from changes to the Numbering System. Communications Alliance expects the proposal would result in additional costs to industry and consumers.</p>
1.10	Should the numbering plan limit the number of times a number can be provided to another CSP under contractual arrangements	No.

No.	Question	Response
	(that is, assign the number) outside the Numbering System?	
1.11	Should the numbering plan restrict entities which can be assigned numbers to Australian businesses?	<p>No.</p> <p>While it may seem sensible, for jurisdiction purposes, to limit the assignment of numbers to Australian businesses there may be valid use cases where a number allocated to a CSP via the Numbering System may then assign the number to an entity that is not in Australia.</p> <p>An example of such an assignee might be a global telecommunications carrier providing services to Australian branches of a multinational company that has headquarters in the same country as the global carrier.</p> <p>The suggested restriction is inconsistent with the IPND Manager, which allows businesses outside Australia to apply for a CSP code.</p>
1.12	Under proposed transitional arrangements, is 90 days from commencement of registration provisions sufficient time for CSPs that have been assigned numbers to register?	<p>No.</p> <p>It is uncertain whether 90 days would be sufficient time to identify the relevant CSP assigned numbers and notify it of its obligations.</p> <p>As mentioned above, it is unclear how registration in the Numbering System of CSPs that are not allocated numbers will assist in preventing the misuse of numbers by scammers.</p> <p>If there is a necessity to register CSPs it should be done more broadly rather than just within the Numbering System.</p> <p>Requiring a CSP to return assigned numbers if they were not registered within this period is punitive and may adversely impact consumers.</p> <p>Communications Alliance suggests ACMA consider other options that would be less likely to impact consumers.</p>
1.13	Is between 90 to 180 days sufficient time for donor CSPs to check the registration status of CSPs that have been assigned numbers?	<p>No.</p> <p>It is uncertain whether 90 to 180 days would be sufficient time to identify the relevant CSP assigned numbers, notify it of its obligations, and then check the status of the CSP (while recognising that number use can be dynamic).</p> <p>As mentioned above, it is unclear how registration in the Numbering System of CSPs that are not allocated numbers will assist in preventing the misuse of numbers by scammers.</p> <p>If there is a necessity to register CSPs it should be done more broadly rather than just within the Numbering System.</p> <p>Requiring a CSP to return assigned numbers if they were not registered within this period is punitive and may adversely impact consumers.</p> <p>Communications Alliance suggests ACMA consider other options that would be less likely to impact consumers.</p>

No.	Question	Response
	Power to withdraw numbers used for scams	
1.14	In deciding whether to withdraw numbers used for scam or fraudulent purposes, what should the ACMA consider?	<p>Communications Alliance supports the desire to reduce scam communication or other fraudulent activity but does not support the proposed ACMA power to withdraw a number because it:</p> <ul style="list-style-type: none">(i) Could adversely affect end users;(ii) Is likely to have no substantial benefit, if any, on reducing the volume of scam communications; and(iii) Imposes costs on industry. <p>To explain further, this includes:</p> <ul style="list-style-type: none">(i) Scammers use numbers illegally (e.g. spoofing, to appear as the legitimate end user of a number), so the withdrawal of a number could affect legitimate use of the number by an end user.(ii) A scammer uses a number then quickly moves on to using a different number, so any administration system would be pointless as it could not keep up with the scammers; and(iii) Withdrawal of numbers creates work for Carriers (e.g. for network conditioning updates) without making any change to the underlying problem.

Section 2

Efficient allocation of numbers

No.	Question	Response
	Decrease the size of a standard unit of numbers	
2.1	Do you support these initiatives? Why? Why not?	<p>There are different views on this within industry. The proposed reduction in size of a standard unit from 100,000 to 10,000 in the Telecommunications Numbering Plan would allow for more efficient number use where a larger block size is not required or not feasible and will enable increased flexibility in number use, even if not all Carriers and CSPs implement or permit the ability to allocate, transfer or surrender numbers in the smaller block sizes immediately.</p> <p>A reduction in the size of a standard unit for mobile and premium rate numbers to 10,000 is less efficient than the current standard unit size of 100,000 when conditioning networks. For some CSPs the cost to condition networks to manage 10,000 mobile numbers is the same as that for 100,000 mobile numbers.</p>
2.2	Is there any specific cost or burden in relation to the proposals? If so, please provide specific detail against each relevant item.	<p>The cost for any individual Carrier or CSP will vary. Noting these changes will permit the existing arrangements to apply, Carriers and CSPs that are ready to support smaller block sizes report no substantial cost or system changes in conditioning their networks from 100,000 to 10,000 numbers, while those yet to migrate legacy systems will incur a (currently unknown) cost.</p> <p>Examples of likely costs include changes to network conditioning i.e. for some CSPs it would be less efficient to condition multiple 10K blocks than for a single 100K blocks.</p>
2.3	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?	<p>This will vary among individual CSPs. The increased flexibility will mean some CSPs are more likely to apply for an allocation, transfer or surrender of numbers.</p> <p>For other CSPs a reduction in standard unit sizes would not influence its decision to apply for an allocation of numbers.</p>
2.4	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?	<p>Carriers and CSPs that are ready to support smaller block sizes may incur no substantial cost, while those yet to migrate legacy systems will incur a (currently unknown) cost.</p>

No.	Question	Response
2.5	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?	Communications Alliance is not aware of any known disadvantages.
Location independent communications services		
2.6	Are there any reasons to retain location independent communications services (LICS)?	No.
Notice period for the withdrawal and replacement of numbers		
2.7	Do you support decreasing the notice period CSPs must give customers before recalling or replacing a number? Please specify why or why not.	Yes. The notice period is no longer dependent on the timeframe to publish hard copy telephone books.
2.8	Is 90 business days sufficient to allow customers, including small business owners, to make necessary changes to accommodate a new number?	Yes. Communications Alliance believes 90 days is sufficient.

Section 3

Availability of geographic number ranges in certain areas

No.	Question	Response
3.1	Do you support these initiatives? Why? Why not?	<p>The limited information on these initiatives means it is unclear why the numbers in the nominated areas are predicted to expire in the next 2 to 5 years.</p> <p>ACMA's <i>Mobile-only Australia: living without a fixed line at home</i> report noted the trend in people shifting from fixed to mobile communications is continuing.</p> <p>The ACMA consultation paper notes "that not all allocated geographic numbers in these areas may be in use by end-users." and ACMA may consider "whether to withdraw unused numbers ... before releasing additional prefixes."</p> <p>The large decrease in geographic number usage nationally would suggest further analysis of allocated geographic numbers is required to understand if new geographic number ranges are needed.</p> <p>Geographic numbers are subject to significant regulatory requirements e.g. obligations to support carrier preselection in the PSTN and supporting specific call rating like local call charging.</p> <p>Therefore the release of geographic number ranges requires alterations to very complex data structures within networks and systems.</p> <p>Communications Alliance prefers ACMA first ensure existing allocations of geographic numbers are being utilised efficiently by CSPs prior to releasing a new geographic number range.</p>
3.2	Is there any specific cost or burden in relation to the proposals? If so, please provide specific detail against each relevant item.	<p>Carriers would incur operating costs to support new number ranges, including for IT system changes/updates and network conditioning.</p>

Section 4

Other updates

No.	Question	Response
4.1	Do you have any comments about the proposal to remove the objects?	Communications Alliance supports the proposed changes to remove the objects and align its interpretation directly with the relevant objects of the <i>Telecommunications Act 1997</i> .
4.2	Do you have any comments about the proposed changes to definitions?	Communications Alliance supports the proposed changes to definitions to provide consistency with other obligations, including changes to other legislation.



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