

COMMUNICATIONS  
ALLIANCE LTD



COMMUNICATIONS ALLIANCE SUBMISSION  
Australian Communications and Media Authority  
**Review of the Numbering Plan and other  
instruments**  
JULY 2024

## CONTENTS

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<b>INTRODUCTION</b>	<b>2</b>
<hr/>	
<b>SUMMARY</b>	<b>3</b>
<hr/>	
General	3
Support for a principles-based Numbering Plan	3
Separate number type for mobile numbers	3
Eligible Party Identification (EPID) Codes	3
Use of numbers by multiple carriage service providers	3
Remaking the existing Determinations	3
<hr/>	
<b>CONSULTATION QUESTIONS</b>	<b>4</b>
<hr/>	
Principles-based	4
Types of numbers for use	4
Removal of unused number types from the Numbering Plan	4
Digital mobile numbers	5
Internet of Things and machine-to-machine services	6
Short codes	7
Specification of numbers	8
Use of digital mobile numbers	8
VoIP, application-based messaging and cloud-based services	9
Standard Zone Units	9
Traffic origination from outside of Australia	10
Allocation of numbers	10
Availability of numbers	10
Rules for allocation	11
Pooled numbers	13
Eligible Party Identification codes	13
Special rules about smartnumbers	14
Number portability	14
Use of numbers by multiple carriage service providers	15
Multiple-service practice	15
Potential solutions	15
Telecommunications (Provision of Pre-selection) Determination 2015	17
Requirements of the Determination	17
Telecommunications (Provision of Pre-selection) Determination 2015	18
Requirements of the Determination	18

## INTRODUCTION

Communications Alliance (CA) welcomes the opportunity to provide this submission in response to the ACMA discussion paper *Review of the Numbering Plan and other instruments* (the discussion paper).

### **Communications Alliance**

Communications Alliance is the primary communications 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, platform 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 <https://www.commsalliance.com.au>.

## **SUMMARY**

### **General**

Listed below are some of the key points identified in preparing this submission.

On some of the other topics raised in the discussion paper, there is a range of views among CA members. For more information on these topics, please refer to individual submissions from CA members.

### **Support for a principles-based Numbering Plan**

CA supports a move to a principles-based Numbering Plan where associated operational procedures and requirements are developed and managed by industry through codes and guidelines.

### **Separate number type for mobile numbers**

The millions of mobile numbers in use are long overdue to have their own number type instead of being a subset of the special service number type. CA members have individual views on rules that might apply to mobile numbers, so please refer to their individual submissions on this.

### **Eligible Party Identification (EPID) Codes**

CA believes the existing processes for EPID code are working and there are alternatives to enforcement methods than adding EPID codes to the Numbering Plan.

### **Use of numbers by multiple carriage service providers**

Given the long standing, publicly stated, differences of opinion on the topic among CA members, the submission does not comment on the questions posed in the discussion paper about the use of numbers by multiple carriage service providers.

Each Communications Alliance member will have an individual view on this topic. Please refer to individual submissions from CA members for more information.

Communications Alliance encourages a decision by ACMA on this topic, to give more regulatory clarity to the industry.

### **Remaking the existing Determinations**

Communications Alliance considers it unnecessary to remake the *Telecommunications (Provision of Pre-selection) Determination 2015* due to the low use of preselection and the availability of alternative methods to achieve the original goals of preselection.

Communications Alliance recommends ACMA remake the *Telecommunications (Section of the Telecommunications Industry – Portability Service Suppliers) Determination 2015* because Portability Service Suppliers continue to play a significant role in number portability.

## CONSULTATION QUESTIONS

### Principles-based

**1. Do you support a principles-based Numbering Plan where associated operational procedures and requirements are developed and managed by industry through codes and guidelines? Why or why not?**

CA supports a principles-based Numbering Plan where associated operational procedures and requirements are developed and managed by industry through codes and guidelines.

The development and management of operational procedures and requirements by industry would mean the requirements would be informed by the industry experience with numbering.

The use of codes and guidelines would allow for greater flexibility in updating requirements as end user, market, and regulatory needs evolve.

Additionally a restructure of the Numbering Plan to be principles based would be an opportunity to have greater consistency of definitions (e.g. for headings and formatting) across various number types in the Plan, which would improve usability of the Numbering Plan.

**2. What steps or changes to the current Numbering Plan, or existing or new industry codes, would support the evolution towards a more simplified or principles-based document? Please provide details, including likely timeframes.**

CA would like to propose a redraft of the Numbering Plan as a principles-based document for ACMA to consider. For example, this would have consistent headings and format of definitions across the various number types.

CA would welcome further engagement with ACMA on when this proposal could be made available.

### Types of numbers for use

#### Removal of unused number types from the Numbering Plan

**3. Of the number types listed in Table 2, are there any you consider are redundant or becoming less relevant in the industry? What number types that have minimal allocations are being used?**

Number types listed in Table 2 that are redundant or becoming less relevant in the industry include:

- (i) Premium rate and paging;
- (ii) Restricted access and premium;
- (iii) Paging; and
- (iv) Calling Card.

Community service numbers may have minimal allocations now, but it is a number type in use (e.g. for anti-scams work) and has the potential to grow in use.

**4. Could existing number types be repurposed for another use? If so, which number types and for what purposes (for example, which services)?**

Yes. The number types with zero allocations mentioned in the response question 3 could be repurposed. Repurposing of a number type is an opportunity to change the permitted number length to substantially increase the available pool of numbers for the new purpose.

A type of service that could have its own range is for some form of 'data only' service e.g. for use with 'internet of things' (IoT) service.

There is a range of views among CA members on whether ACMA should define a number type for VoIP services. One of the challenges is to define the boundary of what is (and what is not) a "VoIP service", with it meaning different things to different stakeholders.

An important factor to consider is to define a purpose in terms of the characteristics of the service used with the number, not on any underlying technology e.g. VoIP, SIP.

Characteristics raised in discussion that may be relevant include whether a service:

- (i) Includes an interconnection component e.g. 'on net' services use internal network or private numbers and do not interconnect; and
- (ii) Needs a unique identifier e.g. it might not matter if an IoT service has a number that is updated and changes over time, but an individual will want to keep using the same unique mobile number.

**5. Are there any specific costs or impacts of removing number types and associated provisions from the Numbering Plan? If so, please provide details.**

Yes. Each Communications Alliance member will have an individual view on this based on its response to question 4.

Please refer to individual submissions from CA members for more information.

## **Digital mobile numbers**

**6. Should digital mobile numbers be listed as a discrete number type? Why or why not?**

CA supports ACMA defining a discrete number type for mobile services. The historical definition as a subset of 'special services' is outdated and does not reflect the reality that there are millions of mobile services in use.

Note the "digital" in "digital mobile" has been redundant for some time, since the closure of the last analogue mobile network many years ago.

**7. Are there specific rules that should apply to this number type? If so, please provide details and reasons.**

Each Communications Alliance member will have an individual view on the rules that should apply to a number type for mobile services.

Please refer to individual submissions from CA members for more information.

## Internet of Things and machine-to-machine services

### **8. What is the expected demand for mobile numbers for IoT purposes over the next decade?**

Each CA member will have an individual view on the expected demand for mobile numbers for IoT purposes over the next decade.

Please refer to individual submissions from CA members for more information.

### **9. Do you support the introduction of different numbers for IoT and M2M communication? Why or why not?**

CA supports the introduction of a different number type for IoT services, and therefore M2M, communication.

Allowing for a distinct number type from mobile services would alleviate demand for mobile numbers, which:

- (i) are defined in the *Telecommunications Act 1997*;
- (ii) referenced in other legislation;
- (iii) referenced in regulatory instruments e.g. the *Telecommunications (Emergency call Service) Determination 2019*; and
- (iv) have different use to IoT services, which are typically 'data only' services.

This also allows for the separate management of demand for numbers for mobile services and for IoT services.

### **10. Which of the 2 options do you support and why? If neither or another, please explain.**

For IoT devices operating on mobile networks, CA supports the use of public numbers with 10 digits or less. This would help avoid network configuration issues.

The option to use 'private' numbers for or 'on net' use remains available for IoT device operation on a network. Apart from defining a number range in the Numbering Plan for this purpose, further detail would not be required.

### **11. Is there an existing number range that would be suitable for this use, or should a new number range be introduced?**

Industry has discussed suggestions for one or more existing number range(s) that might be suitable for use with services for IoT. These suggestions are being discussed internally at CA members, to better understand potential implications of reusing the suggested number range(s).

As these internal and industry discussions are incomplete it is too early to communicate a final industry position on the topic.

Please refer to individual submissions from CA members for more information.

**12. If numbers were to be introduced to support IoT and M2M communication, how would the operation of these numbers differ from existing numbers and what specific rules would be required?**

This is a complex topic that is under consideration by members and needs further investigation.

Rules for the operation of numbers for IoT and M2M would depend on their use.

For example if a service requires interconnection, then it would need a separate number range from similar services that would be for 'on net' use only.

CA recommends that the focus for such services is on the characteristics of the service more than on the underlying technology (e.g. IoT, M2M).

It is likely that the number ranges for some of these services will not need records in the IPND.

There are no foreseen impacts for interconnection across networks.

Please refer to individual submissions from CA members for more information.

## **Short codes**

**13. Should short codes be introduced in the Numbering Plan for consideration of future use? Why or why not?**

Industry has briefly discussed the use of two different number types, both referred to as short codes:

- (i) The existing use of community service numbers as short codes; and
- (ii) The suggested introduction of shared and dedicated short codes referred to in the discussion paper.

Australia already uses the community service number type for short codes e.g. for reporting scams, domestic and family violence, child safety, 3G network exit, IMEI checking, interconnection and internal network purposes.

There is potential to expand the use of the community service number type for new short code use.

There is a range of views among CA members on the suggested introduction of shared and dedicated short codes for use through the Numbering Plan.

Please refer to individual submissions from CA members for more information.

As mentioned in the response to question 1, CA supports a principles-based Numbering Plan where associated operational procedures and requirements are developed and managed by industry through codes and guidelines.

Therefore CA believes:

- (i) The Numbering Plan could define the number range(s) for short codes.
- (ii) The short codes in use could be listed in a separate industry document, as happens now with other lists for industry use, instead of introducing the details in the Numbering Plan.

- (iii) Allowing an industry working group to oversee the allocation and operational management of short codes for community purposes, while remaining subject to appropriate ACMA enforcement, could be a more efficient approach than ACMA managing the operational details about these codes in the Numbering Plan.

**14. Are there specific rules that should apply to this number type? If so, please provide details and reasons.**

Consistent with the response to questions 1 and 13, CA supports a principles-based Numbering Plan where associated operational procedures and requirements are developed and managed by industry through codes and guidelines.

There are existing rules and governance arrangements in place for the short codes that use community service numbers.

Noting there is a range of views among CA members on the other shared and dedicated short codes, raised in the discussion paper, this would require further exploration of an appropriate model to manage and use any shared and dedicated short codes.

Please refer to individual submissions from CA members for more information.

**Specification of numbers  
Use of digital mobile numbers**

**15. Do you agree or disagree that mobile numbers should only be used to originate calls from mobile networks? Why or why not?**

Each Communications Alliance member will have an individual view on whether mobile numbers should only be used to originate calls from mobile networks.

Please refer to individual submissions from CA members for more information.

**16. Are there specific rules or updates that should apply to mobile numbers, including to support changes in technology and in the use of mobile numbers? If so, please provide details and reasons.**

Each Communications Alliance member will have an individual view on specific rules or updates that should apply to mobile numbers.

Please refer to individual submissions from CA members for more information.

**17. Is the definition of digital mobile services in the Numbering Plan still fit for purpose? If it should be updated, how?**

Each Communications Alliance member will have an individual view on whether the definition of digital mobile services in the Numbering Plan is still fit for purpose.

Please refer to individual submissions from CA members for more information.

## **VoIP, application-based messaging and cloud-based services**

### **18. What specific changes or updates to the Numbering Plan, including definitions, should be made to accommodate these services?**

Each Communications Alliance member will have an individual view on the changes or updates to the Numbering Plan that should be made to accommodate VoIP, application-based messaging and cloud-based services.

Please refer to individual submissions from CA members for more information.

### **19. What types of numbering rules should be included in the Numbering Plan for these types of services?**

Each Communications Alliance member will have an individual view on the numbering rules to include in the Numbering Plan for VoIP, application-based messaging and cloud-based services.

Please refer to individual submissions from CA members for more information.

### **20. Should the definition of Local Service be changed? If so, how?**

Each Communications Alliance member will have an individual view on the definition of Local Service.

Please refer to individual submissions from CA members for more information.

## **Standard Zone Units**

### **21. Are standard zone units still required? Why or why not?**

CA members need to give more consideration to potential use cases affected by this topic and possible broader implications before further feedback and guidance can be shared on it. For example, there may be significant implications in relation to local calls under:

- (i) The legislative and regulatory framework (e.g. for untimed local calls); and
- (ii) Existing commercial contracts.

### **22. If it is possible, do you support the potential move to broader geographic zones and accompanying number ranges?**

Noting the response to 21, there is likely to be merit in rationalising the quantity of standard zone units, but more information would be required before making changes.

CA notes there are:

- (i) Existing legislative and regulatory obligations to work through, with related transitional arrangements; and
- (ii) Potential implications for commercial services – some calls to freephone or local rate numbers rely on the passing through of location information, currently linked

to standard zone units, to assist with identifying the location of an end user who is requesting a product (e.g. ordering a pizza) or service (e.g. requesting a taxi).

**23. What costs or burdens could result from such a change?**

Each Communications Alliance member will have an individual view on the costs or burdens that could result from the potential move to broader geographic zones and accompanying number ranges.

Please refer to individual submissions from CA members for more information.

### **Traffic origination from outside of Australia**

**24. Should there be rules about the use of Australian numbers to originate calls from locations outside Australia? Why or why not?**

Each Communications Alliance member will have an individual view on whether there should be rules about the use of Australian numbers to originate calls from locations outside Australia.

Please refer to individual submissions from CA members for more information.

**25. Noting stakeholders have cited scam calls originating offshore using Australian numbers as the reason for this suggestion, should any such rules be in the Numbering Plan or another instrument? Please explain your answer.**

Each Communications Alliance member will have an individual view on this topic.

Please refer to individual submissions from CA members for more information.

**26. What would be the effect of such rules on businesses and consumers?**

Each Communications Alliance member will have an individual view on the effect of such rules on businesses and consumers.

Please refer to individual submissions from CA members for more information.

### **Allocation of numbers Availability of numbers**

**27. Are there any comments on the list of proposed numbers in Appendix B?**

CA supports the prudent increase of number availability where potential shortfalls are identified.

**28. Should the ACMA withdraw unused numbers under section 94 of the Numbering Plan, before releasing additional prefixes or numbers?**

This is a complex topic that CA members are reviewing. For example, if unused numbers are conditioned on networks, and then withdrawn by ACMA, the network conditioning for those numbers would need to be undone.

Please refer to individual submissions from CA members for more information.

**29. Are there any number conservation strategies the ACMA should consider in a remade Numbering Plan?**

CA supports a principles-based Numbering Plan where associated operational procedures and requirements are developed and managed by industry through codes and guidelines.

Operational matters like number conservation would not be a part of the Numbering Plan but would belong in an operational document instead.

As noted under question 28, these are complex topics that will require time to work through the nuances of the choices involved.

## **Rules for allocation**

**30. Should there be stronger, or more prescriptive, rules for allocating numbers to C/CSPs in the Numbering Plan? Why or why not?**

CA supports clear rules for allocating numbers to C/CSPs e.g. to reduce the risk of unintended consequences like allocating a quantity of numbers that is significantly more than the requesting entity is reasonable likely to use.

It is unclear whether stronger, or more prescriptive, rules should be in the Numbering Plan.

Consistent with the response to question 1, CA supports a principles-based Numbering Plan where associated operational procedures and requirements are developed and managed by industry through codes and guidelines.

Operational matters like the details of number allocation rules can be defined in subordinate, supporting document(s) that can be updated more readily than the Numbering Plan, as requirements evolve over time.

**31. Should the ACMA seek additional information from CSPs during the application process for numbers? Would this strengthen the integrity of the numbering ecosystem?**

CA supports ACMA seeking additional information from CSPs during the application process for numbers.

**32. Should CSPs be required to seek additional information from other CSPs before being able to sub-allocate/assign numbers to them? Why or why not?**

CA supports there being consistency of rules on the information required from CSPs for the allocation and for the suballocation of numbers.

Consistent with the response to question 1, CA supports a principles-based Numbering Plan where associated operational procedures and requirements are developed and managed by industry through codes and guidelines.

CA believes any information requirements should be in an operational code for greater flexibility.

**33. Should the ACMA consider enhancing its registers in the Numbering System to improve visibility of all current CSPs and the numbers they hold? Why or why not?**

There is a range of views among CA members on this topic.

Some in industry consider the current arrangements to be satisfactory. Some in industry support greater visibility of the holders of numbers, but this should not be done via the Numbering System.

For example, visibility of sub-allocations could be available from the holder of the numbers instead of amending the Numbering System. The Number Management: Use of Numbers by Customers Industry Code requires a CSP that assigns a Number to another CSP outside the Numbering System to maintain a record.

**34. Do you support the ACMA revisiting its proposal for CSPs to be registered in the Numbering System before they can be assigned numbers?**

No. There is no need to revisit the ACMA proposal for CSPs to be registered in the Numbering System before they can be assigned numbers.

The points made in the Communications Alliance submission from November 2022 in response to ACMA Consultation 32/2022: *Amending the Telecommunications Numbering Plan 2015* remain true, namely:

“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.

If there is a necessity to register CSPs it should be done more broadly rather than just within the Numbering System.

For example, one CSP that is allocated numbers and then assigns numbers to other CSPs requires all these CSPs to register with the IPND.

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:

- (i) the Number Management: Use of Numbers by Customers 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.
- (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 “preventing the misuse of numbers by scammers”, given scammers typically target consumers.

- (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.
- (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."

**35. Do you support provisions requiring annual audits in the Numbering Plan? Why or why not?**

ACMA presumably already has the ability/powers to conduct an audit when required.

It is unclear why, if an audit might be necessary, it should be:

- (i) Performed annually; or
- (ii) Defined in the Numbering Plan.

**36. What specific costs or burdens could arise due to these proposals? Please provide specific details.**

There is a range of types of audits with differing levels of costs e.g. from 'desktop' to 'forensic'.

Each CA member will have different costs or burdens from these proposals.

Please refer to individual submissions from CA members for more information.

## **Pooled numbers**

**37. Should any rules be introduced in the Numbering Plan for 'pooled' numbers? If so, why, and what should the rules be? If not, why not?**

Each Communications Alliance member will have an individual view on 'pooled numbers'.

Please refer to individual submissions from CA members for more information.

## **Eligible Party Identification codes**

**38. What are your views about using the Numbering Plan to enforce the use of EPIDs?**

Consistent with the response to question 1, CA supports a principles-based Numbering Plan where associated operational procedures and requirements are developed and managed by industry through codes and guidelines.

It is inappropriate to use using the Numbering Plan to enforce the use of EPIDs because there are already:

- (i) industry arrangements for allocating and using EPID codes; and
- (ii) other methods for ACMA to enforce industry developed arrangements.

**39. What are the specific costs or burdens that may result from this suggestion?**

ACMA would incur costs to change the Numbering Plan to add EPIDs and presumably to change the Numbering System. CA assumes these costs would need to be recovered through industry, which in turn would flow through to end users of services.

CSPs would also incur internal costs to change existing processes and systems that use EPIDs.

Each Communications Alliance member would experience different specific costs or burdens from this suggestion.

Please refer to individual submissions from CA members for more information.

### **Special rules about smartnumbers**

**40. Do you support these initiatives? Why or why not?**

This is a potentially complex topic.

Please refer to individual submissions from CA members for more information.

### **Number portability**

**41. Are the number portability provisions in the Numbering Plan still fit for purpose? Why or why not?**

Consistent with the response to question 1, CA supports a principles-based Numbering Plan where associated operational procedures and requirements are developed and managed by industry through codes and guidelines.

CA believes operational details of number portability requirements should be moved from the Numbering Plan to an operational industry code for greater flexibility and to allow requirements to adapt in a timely manner to changing regulatory, end user and service provider needs.

CA recognises:

- (i) A move of operational details of number portability requirements from the Numbering Plan to an operational industry code would take some time, including to develop and implement transitional arrangements.
- (ii) Some number portability provisions would need to remain in the Numbering Plan e.g. those on exemption from portability, while noting a principles-based Numbering Plan is likely to have less need for exemptions from portability obligations.

**42. Are there any additional matters the ACCC should consider regarding number portability provisions in the Numbering Plan? Please explain.**

CA has not identified any additional matters the ACCC should consider regarding number portability provisions in the Numbering Plan.

## **Use of numbers by multiple carriage service providers**

### **Multiple-service practice**

#### **43. Do you support the use of numbers by multiple CSPs? Why or why not?**

Communications Alliance encourages a decision by ACMA on this topic to give more regulatory clarity to the industry.

Given the long standing, publicly stated, differences of opinion on the topic among Communications Alliance members, the submission does not comment on the questions posed in the discussion paper about the use of numbers by multiple carriage service providers.

Each Communications Alliance member will have an individual view on this topic.

Please refer to individual submissions from CA members for more information.

#### **44. Can you provide some evidence / data of the benefits or harms of this practice? Please provide details and indicate if this information is provided in confidence.**

Each Communications Alliance member will have an individual view on this topic.

Please refer to individual submissions from CA members for more information.

### **Potential solutions**

#### **45. Which of the 3 potential options do you consider to be most viable in the circumstances and why? Please provide details.**

Each Communications Alliance member will have an individual view on this topic.

Please refer to individual submissions from CA members for more information.

#### **46. What are the potential benefits and costs to industry and end-users of each of option?**

Each Communications Alliance member will have an individual view on this topic.

Please refer to individual submissions from CA members for more information.

#### **47. If option 2 were preferred, what should the rules be and how would this best be achieved / implemented? Are different solutions required for voice and SMS or fixed and mobile services? What are the potential timeframes needed to implement these arrangements from an industry and consumer perspective?**

Each Communications Alliance member will have an individual view on this topic.

Please refer to individual submissions from CA members for more information.

**48. Are there other solutions or measures that could be implemented to address the concerns raised to date?**

Each Communications Alliance member will have an individual view on this topic.

Please refer to individual submissions from CA members for more information.

**49. Is legitimate use of the multiple-service practice a problem? Please explain and provide specific details.**

Each Communications Alliance member will have an individual view on this topic.

Please refer to individual submissions from CA members for more information.

**50. If you are a CSP that uses the multiple-service practice to originate calls/SMs, using numbers issued to your customers by another CSP:**

- a. How many customers and how many numbers in total do you apply this practice to? What number types are used?
- b. What specific services do you provide to customers using these numbers? What is the total volume of calls and / or SMS sent?
- c. What is the total revenue received from services provided to customers using this practice?
- d. Do you also offer similar services to customers using numbers you hold and have directly issued to customers?
- e. Would a customer be able to port their number to you and receive an equivalent service to that supplied by their current CSP? If not, why not?
- f. Do you have (or have you attempted to put) any agreements in place with the CSPs that hold the numbers of customers to whom you provide services? If not, do you notify the CSPs of your use of their numbers? If not, why not?

Each Communications Alliance member will have an individual view on this topic.

Please refer to individual submissions from CA members for more information.

**51. If you are a CSP that holds numbers being used by other CSPs to originate calls on another network (on behalf of a customer who has rights of use of the number) using this practice:**

- a. How many of your customer numbers, that you estimate or are aware of, are being used by other CSPs for this practice? How did you become aware of this use?
- b. If you are aware of another CSP using numbers you hold, have you taken any steps regarding that arrangement (for example, putting an agreement in place, contacting the customer, putting the customer's number on an 'allow' list etc)? If yes, please outline them; if no, why not?
- c. Do you provide similar services to those your customers are seeking to obtain from other CSPs? If so, are you aware of why your customers aren't obtaining these services from you?
- d. What effect does this practice have on your business? What specific costs (if any) do you incur as a result of your numbers being used for this practice? Have there been

**any harms or detriments to your business or your customers because of this practice?  
Please provide specific details.**

Each Communications Alliance member will have an individual view on this topic.

Please refer to individual submissions from CA members for more information.

## **Telecommunications (Provision of Pre-selection) Determination 2015 Requirements of the Determination**

**52. Is the Pre-selection Determination still fit for purpose? Please provide reasons.**

The *Telecommunications (Provision of Pre-selection) Determination 2015* due preselection is unlikely to have a long-term future.

**53. Is the Pre-selection Determination still required to support the competitive delivery of long distance, international and fixed-to-mobile calls? What is the demand for pre-selection? Please provide details.**

CA believes the *Telecommunications (Provision of Pre-selection) Determination 2015* is no longer required to support the competitive delivery of long distance, international and fixed-to-mobile calls given preselection is:

- (i) Redundant – the discussion paper noted ACCC research (from two years ago) “indicates standalone fixed line voice service providers are moving to primarily offer all-inclusive plans that include unlimited local, national, and mobile calls”;
- (ii) Removed – the discussion paper noted “Pre-selection is not required to be provided on services supplied on mobile networks or the NBN” plus the NBN was declared built and fully operational more than three and a half years ago in December 2020<sup>1</sup>;
- (iii) Replaced – the original goal of preselection to deliver choice of service provider over an incumbent fixed access network has been overtaken by a choice of service provider via:
  - a. A wholesale only NBN;
  - b. A move to SIP interconnection; and
  - c. Competing access networks, including in satellite only areas.

**54. Should the ACMA remake the Determination? If so, are there any changes that should be made to the Determination?**

Communications Alliance considers it unnecessary to remake the *Telecommunications (Provision of Pre-selection) Determination 2015* for the reasons set out in the response to question 53.

If ACMA was to remake the *Telecommunications (Provision of Pre-selection) Determination 2015*, CA members have not identified any required changes to the Determination.

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<sup>1</sup> <https://www.infrastructure.gov.au/media-centre/publications/declaration-nbn-should-be-treated-built-and-fully-operational>

**55. What would be the likely effect of allowing the Determination to sunset on end- users, and/or to any other arrangements including on the operation of the FAOS?**

CA believes there is likely to be no effect on end users of allowing the *Telecommunications (Provision of Pre-selection) Determination 2015* to sunset because typical market offerings to end users offer unlimited local and national calls for a fixed amount per month, making preselection a redundant function.

CA believes allowing the *Telecommunications (Provision of Pre-selection) Determination 2015* to sunset will have no effect on the operation of the fixed originating access service (FAOS).

**56. Are there any other factors the ACMA should consider when reviewing the Determination?**

CA is not aware of any other factors ACMA should consider when reviewing the Determination.

**Telecommunications (Provision of Pre-selection) Determination 2015 Requirements of the Determination**

**57. Is the Determination still fit for purpose? Please provide reasons.**

CA believes the Determination is still fit for purpose.

As noted in the discussion paper:

- (i) The Determination “identifies and names Portability Services Suppliers as a section of the telecommunications industry”; and
- (ii) “Portability Service Suppliers play a significant role in number portability”.

Portability Service Suppliers continue to perform a needed role within the industry in the delivery of number portability for end users.

**58. Should the ACMA remake the Determination?**

Communications Alliance recommends ACMA remake the *Telecommunications (Section of the Telecommunications Industry – Portability Service Suppliers) Determination 2015* because Portability Service Suppliers continue to play a significant role in number portability.

As noted in the discussion paper, this “would continue to identify that the parties providing portability services are participants in the telecommunications industry”.

**59. Are there any other factors the ACMA should consider when reviewing the Determination?**

CA is not aware of any other factors ACMA should consider when reviewing the Determination.



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