

1 July 2024

The Manager
Numbering Policy and Regulation Section
Australian Communications and Media Authority

By email to: numberingplanreview@acma.gov.au

Dear Numbering Policy and Regulation Section,

Submission – Review of the Numbering Plan and associated instruments

Thank you for the opportunity to comment on the sunseting review of the Numbering Plan and its related Determinations. The Numbering Plan serves a vital role in the allocation and maintenance of numbers for telco services. The TIO supports the remaking of the Numbering Plan and the expansion of its key protections, particularly for those related to the prevention of scams.

We support the development of a requirement that CSPs must register with the Numbering Plan before they can be assigned numbers. Strong registration requirements, accompanied with regular audits, should help minimise opportunities for malicious actors to gain access to numbers which they might use for scam calls and SMS, and grants the ACMA more visibility on how these CSPs use their numbers. The TIO is also highly supportive of the development of a broader registration scheme for all CSPs, including the power for the ACMA to refuse or revoke registration to prevent consumer harm.¹ If CSPs are required to both register with the ACMA before they can be assigned numbers, and to register with the ACMA to operate as a CSP, the ACMA would have substantially broader powers to combat scams and other misuses of numbers.

Similarly, we support the proposed expansion of the ACMA's powers to cancel enhanced rights of use for smartnumbers that have been used in scams. While there may be a risk of innocent parties losing their smartnumbers through this process (for example, when their numbers are hijacked or spoofed), this risk may be minimised by the development of appropriate safeguards around this decision. For example, we support the proposal that the ACMA would discuss the cancellation with the enhanced rights of use holder before any decision is made, as this will greatly reduce the risk of erroneous cancellations.

¹ TIO, [Submission to Department's consultation on a potential CSP registration or licensing scheme](#) (December 2023)

On the topic of the use of numbers by multiple CSPs, we do not have a strong view at this time. We acknowledge there may be legitimate use cases for these arrangements. However, we remain concerned about the prevalence of number spoofing in scams, and we are cautious of any developments that may undermine anti-scam protections and the accuracy of the Integrated Public Number Database. We support the ACMA in taking whichever steps it deems necessary to prevent consumer harm.

We look forward to seeing the outcomes of this review, and providing further feedback when the new Numbering Plan has been developed.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Cynthia Gebert', followed by a long, sweeping horizontal flourish that ends in a small upward tick.

Cynthia Gebert
Telecommunications Industry Ombudsman