



INTERNET ASSOCIATION OF AUSTRALIA
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To: Communications Alliance

By Submission: <https://www.commsalliance.com.au/Documents/public-comment/submit-comments>

Thank you for the opportunity to express the Internet Association of Australia (IAA) perspective on the Draft C661:2022 – Reducing Spam Calls and Spam SMS Industry Code. We appreciate the review into the code and recognise the importance of expanding its scope to encompass SMS. There has been an increase in the volume and sophistication of spam calls and SMS in recent years, putting both consumers and industry at risk. IAA and our members are committed to combatting scammers and fraudsters to uphold the safety of our consumers and the integrity of our networks.

On the whole, IAA largely supports the draft code and its objectives and requirements. However, we believe further clarification and modification could be made in certain areas, as will be outlined below. Many of IAA's members are small to medium sized telecommunication providers. This response will be largely from the perspective of our smaller businesses in the sector.

OUR RESPONSE

EDUCATION INFORMATION ABOUT SCAM CALLS AND SCAM SMS

We agree with requiring C/CSPs to provide guidance materials on how to mitigate fraud risks related to Scam Calls and Scam SMS on their websites. However, keeping up to date with information and changing standards often proves to be difficult for smaller C/CSPs. While we appreciate the links provided to various guidance tools and awareness campaigns, we note that smaller entities will have to compile the information themselves from different resources which may prove to be a resource intensive task.

As such, we encourage the development of a synthesized guidance material through collaboration between industry and government bodies which can be provided to businesses and published on the web. We believe this could greatly assist smaller entities with fewer resources in complying with the code, as well as serve to be a useful educational tool for the sector.

4.2.1(e) and 5.2.1(e)

IAA supports the implementation of Option 2 under clauses 4.2.1(e) and 5.2.1(e), and strongly advises against Option 1. Many CSPs rely on using wholesale agreements for calling and SMS services, allowing them to manage traffic and access competitive pricing. We believe that Option 1 will result in increased costs and decreased service reliability for smaller C/CSPs and therefore serve as a further barrier to competition which is already an issue in the telco sector.

AMENDMENTS TO C661:2020

Definition of ‘an agreed electronic means’

IAA supports the adoption of a more technology neutral term throughout the Code to allow entities to communicate and share information through their own agreed electronic method.

Removal of clause 4.4.4

We note the removal of cl 4.4.4 from the 2020 Code which requires a Notifying CSP to inform ACMA about a matter where the Notifying CSP provided evidence to another C/CSPs about suspected Spam Calls to which the Notifying CSP does not receive a response. We believe that this should not be removed, or some alternative step should still be included in the Code for instances when a Notifying C/CSP communicates their suspicions of Spam Calls to another C/CSPs and the Notifying C/CSP do not receive a response. Modifications could be made to provide the other C/CSPs with more time to respond to the Notifying C/CSP before the matter is referred to ACMA. This should also be extended to Spam SMSs. We believe this is an important step to ensure necessary follow up and thus bolster the reduction of Spam Calls and SMSs.

Changes to clause 4.5.2

We also note the changes to cl 4.5.2 which required C/CSPs to document share information following the confirmation of Spam Calls. We believe this provides good guidance on the steps to identify Spam Calls, fosters greater collaboration between C/CSPs which can help alert other C/CSPs about Spam Call activity. Therefore, we believe that this requirement or a modified alternative could remain in the new Code, and also apply to confirmed Spam SMSs, at least as an optional step.

Once again, I would like to thank you for providing us with the opportunity to contribute to the C661:2022 – Reducing Scam Calls and Scam SMSs Industry Code. We look forward to continued engagement with industry, government and other stakeholders in the development of an effective, reasonable and practicable Code to strengthen the telecommunications sector’s protection against scam activity.

ABOUT THE INTERNET ASSOCIATION OF AUSTRALIA

The Internet Association of Australia (IAA) is a member-based association representing the Internet community. Founded in 1995, as the Western Australian Internet Association (WAIA), the Association changed its name in early 2016 to better reflect our national membership and growth.

Our members comprise industry professionals, corporations and affiliate organisations. IAA provides a range of services and resources for members and supports the development of the Internet industry both within Australia and internationally. Providing technical services as well as social and professional development events, IAA aims to provide services and resources that our members need.

IX-Australia is a service provided by the Internet Association of Australia to Corporate and Affiliate members. It is the longest running and lowest cost Internet Exchange in Australia. Spanning six states and territories, IAA operates over 30 points of presence and operates the New Zealand Internet Exchange on behalf of NZIX Inc in New Zealand.

IAA is also a licenced telecommunications carrier, and operates on a not-for-profit basis.

Yours faithfully,

Narelle Clark

Chief Executive Officer
Internet Association of Australia