



INTERNET ASSOCIATION OF AUSTRALIA
ABN 71 817 988 968
ACN 168 405 098
PO Box 8700
Perth Business Centre WA 6849
Phone: 1300 653 132

4 November 2022

To: The Manager
Numbers Section
Australian Communications and Media Authority
PO Box 13112
Law courts
Melbourne VIC 8010

By submission: <https://www.acma.gov.au/consultations/2022-10/amending-telecommunications-numbering-plan-2015-consultation-322022>

RE: Proposal to vary the Telecommunications Numbering Plan 2015

Thank you for the opportunity to express the Internet Association of Australia's (IAA) perspective on the draft *Telecommunications Numbering Plan Variation 2022 (No. 1)*. Many of IAA's members are small to medium sized Internet Service Providers (ISPs), many of whom provide both internet and classical telecommunications services. Our submission is primarily to represent the perspective of those members, as well as in support of the general well-being of the telecommunications industry.

Response

We appreciate the work of ACMA to enhance the efficiency and effectiveness of the numbering plan. In particular, we acknowledge that a clear and coherent numbering plan can also be effective in combating scams which have been prevalent and affecting many Australians.

Based on preliminary discussions with some of our members, in general, we do not see substantive issues posed by the proposed changes. However, we request ACMA conduct an extensive awareness campaign so that CSPs become aware of the changes and their resulting obligations.

More specific feedback on questions and areas where we were able to consult with our members follows below.

Question 1.8: Are there any reasons to allow outbound calls using freephone, local rate and premium numbers?

Some of our members are of the view that businesses, including CSPs, using their inbound 13/1800 number as their display number to promote awareness and use of that number as opposed to the organisation's switchboard or individual office numbers could be a legitimate reason to allow outbound calls from freephone and local rate numbers. As businesses have invested in such a number, it may be in their interest to only want customers to see that number in their interactions.

However, we understand that the limitation of such numbers, particularly premium rate numbers, may be necessary to combat scammers. We believe that ACMA should clearly provide supporting evidence of the abuse of these inbound numbers to warrant the limitation being proposed.

Question 1.12: Under proposed transitional arrangements, is 90 days from commencement of registration sufficient time for CSPs that have been assigned numbers to register?

Question 1.13: Is between 90 to 180 days sufficient for donor CSPs to check the registration status of CSPs that have been assigned numbers?

The proposed timeframes seem achievable although they may be challenging in some instances, particularly for smaller CSPs. Thus, we emphasise the need for ACMA to engage in an extensive awareness campaign and provide as much guidance in this process to ensure CSPs are aware of their obligations.

Question 1.14: In deciding whether to withdraw numbers used for scam or fraudulent purposes, what should the ACMA consider?

IAA believes that withdrawing numbers temporarily from the numbering plan due to persistent use in scam activity, will increase the overall quality of the Australian numbering system. Such an approach should also be undertaken with monitoring in place to gather evidence on the effectiveness of the approach.

We believe that setting out a certain threshold may be helpful in ensuring that withdrawing the number will be efficient and practical. A possible threshold could include the consideration of whether other methods to combat the fraudulent activity taking place in association with the number is possible, or likely to be helpful.

IAA also supports the considerations already raised in the consultation paper including the timeframe or method of scamming which may affect the effectiveness of withdrawing numbers used in scam activity. We strongly believe the need for ACMA's proposed power to be reviewable and that CSPs be given a fair opportunity to dispute any decisions made by ACMA.

In addition, there should be minimum thresholds set out for the evidence needed to establish such fraudulent activity has taken place.

ACMA also needs to have reliable mechanisms in place to notify CSPs of number withdrawals such that any network conditioning that needs to take place may be actioned promptly to have the greatest impact. Similarly, when a number is returned to the system after an appropriate window of time, notifications need to be effective and with time to be actioned to ensure consumers get reliably working numbers, and numbers without poor reputations.

Decrease size of standard unit of numbers

IAA and our members generally support this proposal and believe it will especially benefit smaller CSPs, thereby improving competition in the market. For the sake of clarity, we wish to confirm that the cost will be proportionately reduced.

Conclusion

Once again, IAA appreciates the opportunity to contribute to the draft *Telecommunications Numbering Plan Variation 2022 (No. 1)*. We are broadly in support of the proposals and the need to

clarify the numbering plan to ensure its effectiveness and resilience against fraudulent activity. While at this stage we do not see substantive issues arising from the proposed variations, we do note that this will result in some changes for industry, including new obligations. As such, we reiterate that ACMA will need to conduct in depth awareness campaigns to ensure CSPs are aware of and can comply with the new rules and systems. As a matter of good practice, we also believe that ACMA should be more thorough in presenting supporting evidence or materials as to the extent of the fraudulent or otherwise harmful activity that is occurring to warrant the changes being proposed. As the numbering plan will undergo greater review closer to its sunset in 2025, we look forward to continuing to collaborate with the ACMA, industry and other stakeholders to ensure a fit for practice Telecommunications Numbering Plan.

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 carrier neutral 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