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To: Australian Communications and Media Authority

PO Box 13112
Law Courts
Melbourne VIC 8010

By submission: <https://www.acma.gov.au/consultations/2024-12/proposal-vary-telecommunications-service-provider-customer-identity-authentication-determination-2022>

RE: Proposal to vary the Telecommunications Service Provider (Customer Identity Authentication) Determination 2022

The Internet Association of Australia (**IAA**) thanks the Australian Communications and Media Authority (**ACMA**) for the opportunity to respond to the consultation on the Proposal to vary the Telecommunications Service Provider (Customer Identity Authentication) Determination 2022 (**Determination**).

IAA is a member-based association representing Australia's Internet community. Our membership is largely comprised of small to medium sized Internet service providers and retail service providers that also provide other standard telecommunications products and services, and are therefore subject to the Determination. This response is primarily in representation of our members, as well as for the public good of the broader telecommunications sector.

In general, we support the Determination and the proposed amendments that aim to prevent scams and frauds, and bolster security in relations to high-risk customer transactions. However, we offer the below feedback as additional ways to improve the Determination and its practical application to keep consumers safe.

Passkeys

In general, we support the inclusion of passkeys in the Determination. However we question why it is necessary to also comply with subsection 9(3) where a passkey has been used as the primary method of authentication. Compliance with subsection 9(3) seems antithetical to the legislative intent behind introducing passkeys. This is particularly as the most commonly relied upon methods of follow-up authentication, set out in paragraphs 9(3)(a)-(c) can be intercepted.

If deemed necessary to still require multi-factor authentication, we recommend that passkeys be introduced under subsection 9(3) as a more secure alternative to those set out under paragraphs 9(3)(a)-(c).

Guidance Material

We take this opportunity to respectfully request the ACMA to provide further guidance in relation to a CSP's compliance with the Determination. We appreciate the helpful information provided on its

website in relation to the [customer identity authentication rules](#). However, we believe this information could be made more comprehensive to include specific requirements relating to vulnerable customers and unlisted authorised representatives.

Moreover, we would appreciate further clarification on subsection 9(7) (currently subsection 9(6)). It is not clear whether the underlying intent behind the provision is to require CSPs to perform multiple identity authentication processes for each high-risk customer transaction over the course of one interaction, or whether it is to permit multiple attempts of authentication following prior failed attempts. We understand that this confusion has resulted in some CSPs requesting customers (and even those making simple inquiries) to undergo authentication processes multiple times throughout the course of one interaction with their CSP, which has thus caused a lot of frustration for customers particularly where the interaction is in relation to an issue or complaint. Therefore, we would appreciate clarity on the application of this provision.

Once again, IAA appreciates the opportunity to contribute to the proposed amendments to the Telecommunications Service Provider (Customer Identity Authentication) Determination 2022. We look forward to continuing our work with the ACMA, industry and consumers to ensure better protection of consumers.

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 seven 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