

11 March 2022

John Laughlin
WC92 Reducing Scam Calls Working Committee
Communications Alliance Ltd
Submitted via Comments form



Dear John,

Re: REVISED C661:2022 REDUCING SCAM CALLS AND SCAM SMS INDUSTRY CODE

ACCAN thanks Communications Alliance for the opportunity to provide our views on *Industry Code DR C661:2022 Reducing Scam Calls and Scam SMS (the Code)*.

ACCAN broadly supports updates to the Code and any initiatives designed to protect consumers from scam calls and short messages (SMS). There are however several points that the Code should include to further protect consumers and reduce disruptions to their service.

Section 3.1.1 of the Draft Code stipulates that carrier or carriage service providers (**C/CSPs**) must make up-to-date guidance material available to customers on their website. This guidance material pertains to educating consumers about scam calls and SMS and reducing their risk of harm. Given that the Code states that vulnerable consumers are at the highest risk of being defrauded, this section could be improved by requiring all guidance material comply with Communications Alliance's Guidelines on Developing Accessible Documents¹. This would ensure that the guidance material is accessible to all C/CSPs customers.

In addition, ACCAN is concerned that the ambiguity of language used in sections 4.7.2 and 5.7.2 may lead to unnecessary delays in unblocking public numbers. These delays would leave consumers without service longer than necessary. Sections 4.7.2 and 5.7.2 of the Code note that where a public number is found to be incorrectly blocked, a C/CSPs must take action to unblock that public number "as soon as practicable". ACCAN understands that unblocking a number may sometimes be a complex process, but consumers would benefit from an explicit time window to reduce unnecessary disruption of their service. We suggest a time window of 24 hours to unblock an incorrectly blocked public number.

ACCAN welcomes any additional opportunities to provide input on the revising of the Code. Please do not hesitate to contact us should you require further information about any of the issues raised in our submission.

¹ <https://www.commsalliance.com.au/Standards-GuidanceDevelopingDocuments>

Yours sincerely,

Samuel Kininmonth
Policy Officer