
Submission

7 August 2024

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

Re: Review of the Numbering Plan and other instruments discussion paper – reply to comment

The Australian Communications Consumer Action Network (**ACCAN**) thanks the Australian Communications and Media Authority (**ACMA**) for the opportunity to reply to comments on the Review of the Numbering Plan and other instruments discussion paper (**the Review**).¹

ACCAN is the peak body that represents consumers on communications issues including telecommunications, broadband, and emerging new services. ACCAN provides a strong unified voice to industry and government as we work towards communications services that are trusted, inclusive and available for all. ACCAN’s submission focuses on three key issues raised in the discussion paper most relevant to telecommunications consumers.

1. ACCAN supports the current Numbering Plan framework under the ACMA

As set out in ACCAN’s original submission to the Review, ACCAN supports the ACMA to continue administering the existing rules-based framework as it provides greater regulatory certainty.

The technical area of numbering policy requires clear, prescriptive and impartial rules and procedures. We note that industry support for a principles-based approach seems to be mixed. Industry views include:

- Commpete has the view that despite some advantages, ‘the existing Code making approach does not always deliver clear and timely outcomes’.²
- Twilio has concerns over the use of industry codes to deal with ‘important issues’ which ‘tend to reflect the interests and perspectives of traditional local operators’.³

While there have been some expressions of support for ‘principles based’ numbering, ACCAN queries whether this would result in an outcome that is in the public interest, and efficient. We note that the efficiencies of scale from a prescriptive rule-based system for numbering is likely to be high given the overall figures of numbers in usage. In contrast, ‘principles based’ numbering may create unnecessary adjudication and decision-making costs for the use of numbers, increasing the cost of the numbering system.

¹ The submissions discussed and the discussion paper can be found at:
<https://www.acma.gov.au/consultations/2024-05/review-numbering-plan-and-associated-instruments>

² Commpete 2024, p.3.

³ Twilio 2024, p.5.

Given the mix of industry views on the issues raised in this consultation and the current efficiencies from the ACMA drafting and managing the Numbering Plan, the Numbering Plan is best kept as a rules-based framework administered by the ACMA.

2. ACCAN remains concerned by calls originating outside Australia using Australian numbers

Scam calls originating offshore using Australian numbers need to be stopped, as noted by stakeholders in the first round of consultation. For example:

- The ACCC notes that ‘the absence of downstream verification for overseas users of Australian numbers’ is a key vector of scams.⁴
- Optus reports ‘seeing hundreds of thousands of calls incorrectly using Australian numbers every day’.⁵ According to Optus, ‘Australian numbers have been used by scammers who are primarily based offshore...[as the]... Australian number is essentially a credential that is more trusted within Australia than an overseas number’.⁶

ACCAN agrees that the use of Australian phone numbers originating overseas does not meet community expectations around caller identity and undermines consumer confidence in communications infrastructure. As one submitter states: ‘I have a fear that answering a call may put me in peril and that doing so will add my number to some hidden list of numbers that answers calls which then just causes more unwanted calls.’⁷

ACCAN agrees with the ACCC that the revised numbering plan should impose restrictions on the sale of Australian numbers to provide a clearer regulatory framework.⁸

3. ACCAN supports the prohibition of multiple services to a number while protections are developed

ACCAN continues to support the prohibition of the multiple-service practice immediately until a robust anti-scams framework can be developed by industry and demonstrated to the regulator. Other stakeholders have observed a link between multiple services to a number and scams:

- The ACCC notes that the practice of number sharing and calling line identification over-stamping are key enablers for scams.⁹
- Telstra estimates that ‘at least 80% of calls received by Telstra from domestic carriers, who don’t hold the numbers, are scams’.¹⁰
- TPG Telecom has also reported ‘exponential increases in scam activity due to the misuse of numbers.’¹¹

Taking the numbers reported by the telcos into account, the revised Numbering Plan must protect consumers from what appears to be an enormous quantity of scam calls.

⁴ ACCC 2024, p.2.

⁵ Optus 2024, p.2.

⁶ Optus 2024, p.7.

⁷ Keith Edwards, p.1.

⁸ ACCC 2024, p.4.

⁹ ACCC 2024, p.2.

¹⁰ Telstra 2024, p.14.

¹¹ TPG Telecom, p.2.

We thank the ACMA for the opportunity to reply to comments on the Review. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact me at samuel.kininmonth@accan.org.au.

Yours sincerely

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The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers. ACCAN is committed to reconciliation that acknowledges Australia's past and values the unique culture and heritage of Aboriginal and Torres Strait Islander peoples. [Read our RAP](#)
