

# Proposed Changes to the Numbering Plan

12 February 2024

## Key recommendations

### This Submission recommends:

- > Retaining the existing rules-based numbering framework.
- > The cancellation of enhanced rights of use for numbers used for scam and fraud purposes.
- > The introduction of a discrete number type for mobile services.
- > The introduction of new special services number types for Internet of Things (IoT) and public safety services.

## About this submission

The Australian Communications Consumer Action Network (**ACCAN**) is pleased to provide this submission to the Australian Communications Media Authority (**ACMA**) regarding the proposed changes to the Numbering Plan and other instruments.

The Numbering Plan plays a pivotal role in the telecommunications sector by ensuring efficient allocation and management of telephone numbers, which are essential for consumer connectivity and competition. ACCAN supports ACMA's efforts to modernise the numbering framework while safeguarding consumer interests.

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**Australian Communications  
Consumer Action Network**

### **Australian Communications Consumer Action Network**

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.

## **Introduction**

ACCAN thanks the ACMA for the opportunity to comment on Proposed changes to the Numbering Plan and other instruments consultation paper.

ACCAN supports ACMA's initiatives to streamline the numbering system by removing or altering outdated elements and introducing new numbering types to enhance the efficiency and reliability of the numbering system.

ACCAN welcomes the proposals made to address scam and fraud activities through increased accountability and the strengthening of the ACMA's powers to protect consumers while balancing methods that restrict the origin of mobile numbers to mobile networks, which may unduly restrict services.

The Numbering Plan should encourage transparency, accountability, and efficient regulation of the industry while ensuring robust safeguards are in place to promote consumer well-being and the delivery of reliable services.

These changes are timely and crucial for addressing contemporary challenges, including mitigating scams and facilitating emerging technologies.

## Recommendations

### **A principles-based numbering plan should be avoided**

ACCAN has been consistently opposed to a principles-based numbering plan. It would lead to ambiguity and shift the burden of interpretation to the industry while increasing costs for consumers without adequate consumer protections. A principles-based framework would require interpretation for common problems, creating uncertainty and wasting time and human capital where a rules-based framework would result in faster and more reliable decision-making.

ACCAN maintains that the current prescriptive framework has had good results for preventing harms to consumers and advocates for retaining the rules-based framework, as the technical nature of numbering policy calls for transparent and impartial procedures that provide greater regulatory certainty.

### **Redundant number types should be removed**

ACCAN supports removing redundant number types as an appropriate measure for streamlining the numbering system and freeing underutilised ranges for future usage. Transparency in reallocating these numbers is essential, and ACCAN recommends that the ACMA provide comprehensive details about any proposed reallocation plans, including associated costs and anticipated benefits.

### **A discrete number type for mobile services should be introduced**

ACCAN recognises the modern context of mobile services as a dominant means of communication and accessing the internet, making their historical designation as a special numbers service no longer appropriate. Therefore, ACCAN supports the introduction of a discrete number type for mobile services to reflect their modern context better.

Regarding the restriction of mobile numbers to originating from mobile networks, ACCAN's view is that the benefits of this restriction would outweigh the potential drawbacks.

This position is formed chiefly with concern to the wellbeing of consumers, specifically regarding the potential impacts on functionality of the Triple Zero system and data accuracy for future switch-over events similar to the 3G shutdown. The ACMA should thoroughly investigate these factors when exploring this issue in the future.

ACCAN considers it important for ACMA to explore the sorts of numbering practices that facilitate or enable scams, and the extent to which the numbering plan can evolve to enhance the integrity of numbers from the consumer's perspective. For example, the ACMA should consider additional methods to protect consumers from scam calls, such as providing consumers with the option of blocking all international calls to their phones.

Singapore has already enacted a multi-layered approach to preventing scam calls that includes flagging all overseas calls and offering consumers the option to block calls from international numbers.<sup>1</sup>

### **A new special services number type for Internet of Things (IoT) is needed**

The IoT is a growing sector for digital communications that, much like mobile phone numbers, has begun to outgrow the historical definitions in which it currently sits. Introducing this number type would ensure these services have a recorded owner and point of contact, allowing for better tracking and record-keeping of services. ACCAN notes that a lack of such records created significant issues in the 3G shutdown process, making it difficult to determine the scale and nature of IoT devices that would be impacted, to say nothing of identifying and alerting consumers that may be harmed, particularly those relying on IoT medical devices. Establishing this new special services number type would be a positive step toward mitigating such issues on future projects of a similar nature. ACCAN's view, therefore, is that it would be appropriate to introduce a special number type for IoT services.

### **ACCAN supports a new special services number type for public safety service**

ACCAN endorses the creation of a special number type dedicated to public safety services. A special number type would ensure numbers for critical services are treated with an appropriate level of priority and safeguarded against repurposing and operational disruptions.

### **ACCAN supports updating the definition of local service**

ACCAN views modernising the definition of local services as a necessary step to reflect contemporary communication practices. ACCAN supports this measure to align regulations with consumer expectations and technological advancements.

### **Numbers used for scam and fraud purposes should have enhanced rights of use cancelled**

ACCAN maintains our position that the ACMA should be empowered to withdraw smartnumbers if there is evidence that they are utilised for scam activity. In ACCAN's view, while smartnumbers are valuable tools for businesses and brand communication, their purchase is a privilege that must be balanced against the potential harm they may inflict upon consumers via scams.<sup>2</sup>

ACCAN's position is that safeguards of this nature are vital to consumer well-being and would urge the ACMA to consider stricter timelines between notification and action taken against a number, as five business days represent a significant period through which scammers may cause harm to consumers. It is ACCAN's view that businesses in a position to acquire a smartnumber should be capable of and expected to take action to protect consumers and preserve the integrity of their number within 48 hours of notification.

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<sup>1</sup> IMDA, 'Telcos Introduce Option to Block International Calls | IMDA' (4 January 2024) <<https://www.imda.gov.sg/resources/press-releases-factsheets-and-speeches/press-releases/2024/opt-to-block-incoming-international-calls>>.

<sup>2</sup> ACCAN and Sam Kininmonth, 'Submission The Manager, Numbering Policy and Regulation Section Australian Communications and Media Authority Re: Review of the Numbering Plan and Other Instruments Discussion Paper' <<https://accan.org.au/files/Policy%20Positions/PP%202022->>>.

## **ACCAN supports increasing the availability of geographic numbers**

Geographic numbers remain an essential resource for consumers and businesses. ACCAN supports measures to ensure equitable availability, particularly in underserved regions, to prevent potential disadvantages to rural and remote communities.

## **Potential changes to be considered**

### **CSP registration promotes transparency and accountability**

ACCAN supports the mandatory registration for Carriage Service Providers (**CSPs**) as it will encourage transparency and accountability in the telecommunications sector while reducing scam risk by ensuring that only verified entities are allocated numbers.

### **Further guidelines should be developed for the allocation application processes**

ACCAN supports the ACMA in developing further allocation application guidelines, provided they are designed to ensure greater transparency and accountability from providers and clear penalties for misuse of allocated numbers.

### **Strengthen consumer rights of use**

As numbers are becoming increasingly important to individuals and small businesses, particularly as methods of identity verification, ACCAN supports strengthening customer rights of use for their numbers and advocates for a robust appeals process to ensure adequate protections preventing arbitrary or premature withdrawals for number holders.

Given the forthcoming consumer protections regarding Domestic, Family, and Sexual Violence, the ACMA should ensure that the numbering plan and rights of use do not conflict with those new standards.

### **Multiple use of numbers should be prohibited**

The use of a number by multiple CSPs is a significant vector for scam calls, and while there are legitimate use cases for this practice, it is ACCAN's view that the potential harm to consumers outweighs any benefits it provides. As safeguards take time to implement and consumer harm is a present and consistent threat, ACCAN advocates for the immediate prohibition of this practice and its gradual re-introduction once appropriate protections are in place.

### **Removal of standard zone units (SZUs)**

Emerging technologies and the prevalence of IP telephony services has drastically reduced the relevance of SZUs, and in the long-term they may become entirely redundant.

ACCAN supports the eventual removal of SZUs, provided that the potential for service disruptions is thoroughly investigated and accounted for, and that any transition is well-communicated to consumers.

## **Supporting Short codes**

Community services such as the charities, youth support, domestic violence and disaster helplines benefit from the utility of short codes through the provision of easy to recall contact numbers that consumers can be confident are not scams or fraud.

ACCAN supports enhancing accessibility and protections for short codes, particularly those linked to community services.

## **Other matters**

### **Draft Telecommunications (Section of the Telecommunications Industry – Portability Service Suppliers) Determination 2025**

ACCAN supports the ACMA in retaining the substantive form of the Portability Service Suppliers Determination while making minor changes to account for newly identified portability services and conform to current drafting practices.

### **Sunsetting of Telecommunications (Provision of Pre-selection) Determination 2015**

ACCAN acknowledges that allowing this determination to sunset is unlikely to have a significant impact, as the market in which this provision was designed to promote competition functionally no longer exists. However, as TPG has highlighted, a cohort of consumers still use pre-selection. Discontinuing this determination may disproportionately affect these consumers.

ACCAN recommends that ACMA prioritise raising consumer awareness regarding this change and implement transitional measures to support affected customers. By ensuring consumers are informed and adequately supported, ACMA can mitigate the potential adverse effects of this sunseting process on vulnerable communities.

## **Conclusion**

The Numbering Plan must evolve to reflect consumers' contemporary needs and requirements while ensuring appropriate safeguards are in place. ACCAN strongly supports introducing a discrete number type for mobile services and creating new special services number types for IoT and public safety services while avoiding restrictive origination requirements.

ACCAN reiterates its support for the ACMA's empowerment to cancel enhanced rights of use for numbers implicated in scams and fraud and the decision to retain the existing rules-based numbering framework to ensure clarity and consumer protection.

By addressing these key areas, the updated Numbering Plan will provide a robust foundation for the future, ensuring equitable access, regulatory transparency, and protections against emerging threats. ACCAN remains committed to working with ACMA to refine these proposals and ensure the numbering system continues to serve the best interests of consumers. ACCAN thanks the ACMA for the opportunity to provide this submission

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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.](#)*

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