

25 July 2022

The Manager

Numbers Section
Australian Communications and Media Authority
PO Box 13112
Law Courts
Melbourne VIC 8010

Submitted online

RE: Consultation on Proposed ACMA fees for service 2022–23

Thank you for the opportunity to submit comments on the consultation on *Proposed ACMA fees for service 2022–23* (the consultation).

While carriers and carriage service providers who are members of Communications Alliance will provide separate submissions to the ACMA responding to the consultation, the Communications Alliance Numbering Steering Group (**NSG**) wishes to take this opportunity to raise a broader telecommunications number charging issue with the ACMA, as well as the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (which will also receive a copy of this letter).

The NSG acknowledges that the ACMA works under the Australian Government Charging Framework to recover costs for numbering via charges and that the consultation is an important part of updating these charges.

Nonetheless, the NSG has a concern that the arrangements for number charging, as set out in the proposed changes to the *Telecommunications (Charges) Determination* and the *Telecommunications (Numbering Charges) (Allocation Charge) Determination*, do not appear to be sustainable in the long term. The existing model under the Determinations is based on recovering costs per transaction. The consultation proposes a very significant increase in the per transaction fees. In the context of an ongoing trend of falling volumes of transactions for allocations of Freephone and Local Rate Numbers, such substantial increases are expected to contribute to a cycle of lower transaction volumes, leading to further increases in charges in the future.

Apart from the short-term requirement discussed above, Communications Alliance members recommend a holistic review of numbering charges would be appropriate. That review should also consider the annual number charge, currently levied under the *Telecommunications (Annual Charge) Determination 2014*. Communications Alliance would be very pleased to contribute to that review and the development of a more sustainable numbering charges regime.

This review is likely to require policy decisions and industry would welcome engagement with both the Department and the ACMA in such a review.

We look forward to discussing these important topics with the ACMA and the Department.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J Stanton', with a long, sweeping underline.

John Stanton
Chief Executive Officer

Cc: Tristan Kathage, DITRDCA