

Investigation report

Summary	
Entity	Twilio Inc
Type of service	Carriage service provider
Relevant code	Industry code C661:2022 Reducing Scam Calls and Scam SMS
Findings	Breaches of clause 5.2.2
Date	14 August 2023

Findings

The Australian Communications and Media Authority (the **ACMA**) has found that Twilio Inc (**Twilio**) has contravened clause 5.2.2 of the Industry Code C661:2022 Reducing Scam Calls and Scam SMS (the **Code**).

Reasons

- The ACMA's findings are informed by information and documents obtained from Twilio on:
 - 7 February 2023, in response to a statutory notice given under section 521 of the *Telecommunications Act 1997* (the **Act**)
 - 9 March 2023, in response to a statutory notice given under section 521 of the Act
 - 19 March 2023, in response to a request for additional information, and
 - 18 April 2023, in response to the ACMA's preliminary findings.

Relevant Background

- The Code places obligations on all carriers and carriage service providers (**C/CSPs**) to implement measures to protect consumers from harms caused by scams and to disrupt scam activity in Australia.
- Among other requirements, the code places obligations on C/CSPs to not originate Short Messages (**SMs**) traffic using Alphanumeric Sender IDs (**Alpha IDs**) without taking steps to confirm that the initiator of the SMs, the A-Party, has a valid use case for the Alpha ID.

Compliance with clause 5.2.2 – Improving Alphanumeric Sender ID Accuracy

- Clause 5.2.2 of the code states:

If a SM uses an Alphanumeric Sender ID, Originating C/CSPs must only originate SMs on their Telecommunications Network using an Alphanumeric Sender ID where:

 - it does not present as a Number; and*
 - the Originating C/CSP has been provided evidence by the A-Party confirming that the A-Party has a valid use case for the Alphanumeric Sender ID.*
- Clause 2.2 of the code states Alphanumeric Sender ID means a personalised identifier (for example, the name of a business or organisation) instead of a Number.
- To determine Twilio's compliance, the ACMA has addressed the questions set out in Table 1 below.

