



**netnumber's Reply to Comments to
the Discussion Paper
“Review of the Numbering Plan
and other instruments”**

NetNumber, Inc. (**netnumber**), a global provider of Number Intelligence as a Service (NlaaS) solutions that guide messaging and voice traffic and the operator of the North American text message routing and Sender ID registry, hereby replies to comments made by numerous industry participants in response to the Discussion paper issued by the Australian Communications and Media Authority called “Review of the Numbering Plan and other instruments”.

The submissions present a wide range of opinions making valid points for at times totally contradicting perspectives. One controversy is around the use of Digital Mobile Numbers: Whilst one side argues for the exclusive use of mobile phone numbers by traditional mobile networks and respective mobile devices, the other side argues for the need to also use mobile phone numbers for communications services provided by non-traditional or virtual networks.

Nevertheless, there seems to be general agreement on several other demands for improvement, like clear definitions of use cases for numbers beyond the definition of number types, the need for better sub-allocation / sub-assignment functionality and rules, the general flexibility to introduce and support new innovative communications methods, and the end user’s right of use due to phone numbers being now an integral part of consumers’ and businesses’ digital identities.

We believe that (a) the enablement of non-mobile numbers for messaging offers a path to resolve the controversy about the use of Digital Mobile Numbers and that (b) a central registry as described in our submission, e.g. the nnSR, fulfills the requirements to quickly and cost-effectively answer the common demands.

Enablement of Non-Mobile Numbers for SMS

The mobile ecosystem in the United States supports innovation and programmable communications by enabling messaging services on non-mobile numbers whilst reserving mobile numbers for traditional wireless networks. On the one hand, this concept fulfills the demand to only use Digital Mobile Numbers for PMTS (e.g. Optus par. 15-16, Telstra p3-4, TPG pp14) and on the other hand, it fulfills the demand for flexible use of numbering resources, especially to use numbers with the same functionality as mobile numbers for IP services (e.g. Virtutel par. 4, Twilio par. 5, Voxbone p2-3).

In practice this means that consumers and businesses as well as carriers can register their own geographic or toll-free (non-geographic) phone numbers for the use of SMS services in real time. The needed authority stems either from proving the right of use or allocation by the regulator (e.g. Twilio par. 11.17). The agent for such SMS services can be chosen freely also allowing different service providers for calling and messaging.

A comprehensive in-depth guide on 10DLC business texting has been published by MEF and can be found at <https://mobileecosystemforum.com/the-brands-guide-to-10dlc-business-texting/>.

In addition, some submission claim that the introduction of additional numbering resources for messaging will eliminate the need for sharing and pooling of numbers (Virtutel par. 37), which is a practice generally acknowledged to have a high risk for SCAM.

A Central Registry Answering Common Demands

Not only does a central registry provide an option to enable non-mobile numbers for SMS, but it also answers the common demands for numbering management functionalities, like portability, sub-allocation, designation of use cases, and more.

Numerous submissions acknowledge that the extension of existing registries or the introduction of new registries or the convergence of multiple registries into a single-source-of-truth would pose significant advantages to the industry (e.g. Optus par. 51, Virtutel par. 34, Twilio par. 7.11 & 8.4 & 10.2).

Converging the IPND and the portability of mobile and local numbers into one central neutral registry makes legitimate transfer more transparent and accessible for all players including incumbents as well as new entrants (Optus par. 33, Twilio par. 10.15, Virtutel par. 33-34). Further, it enables the transfer from mobile to geographic or to any other new type, e.g. non-geographic.

A central register offers the benefit of storing and distributing any number of attributes associated with phone numbers also covering the “Do Not Originate”, use case (e.g. Optus par. 6).

The netnumber Services Registry already performs the numbering management functionalities demanded by many of the submissions. The nnSR serves as the single source of truth for many use cases in the North American market today. We encourage the Australian Government and ACMA to consider the netnumber Services Registry as a ready-made solution for future implementation and enforcement of Australia’s rules regarding its Numbering Plan.