Submission to the ACMA consultation on changes to

The Numbering Plan and other Instruments

Public Version

February 2025

EXECUTIVE SUMMARY

1. Optus welcomes the opportunity to provide comments on the ACMA's consultation on changes to the Numbering Plan and associated instruments. Optus supports updating the Telecommunications Numbering Plan, including provisions for internet of things. We also support the evolution of mobile numbers becoming their own discrete number type, although are concerned about unintended consequences of making the number type a catch-all for anything that doesn't fit into another category of service. We reiterate that mobile numbers can only be used with a service provided by a mobile network operator.

2. The ACMA proposes to make changes to the definition of 'local service' that would expand its usage from being at a fixed location to also allow portable locations. While Optus has also submitted that SZUs should be reformed, this service type should be considered for renaming, as it would no longer be local. Optus submits that the introduction of nomadic services would provide further options for services that aren't geographically limited and would include messaging capabilities.

3. Optus also raises additional points of consideration for other proposals, including the definition of public safety number, the usage of numbers for IoT services, and the cancellation of smartnumbers being used in relation to scams.

4. Optus also supports the removal of redundant definitions and number types, the addition of a provision to allow the ACMA to correct errors in decisions that were made by a computer program, expansion of shortcodes for community service purposes, and the introduction of provisions that would require a CSP to be listed on a CSP register prior to having numbers allocated, sub-allocated or transferred to them.

5. Optus notes that ACMA have not decided to specifically allow or prohibit the illegitimate Multiple Service Provider (MSP) practice, which is already prohibited through a range of instruments that create the regulatory construct on how numbers may be used. The ACMA has raised the possibility of establishing a program to identify changes to legislation and other instruments and arrangements would be required to legitimise MSP. Optus has previously provided the ACMA with a list of impacted instruments, and we note it would require extensive work to ensure that MSP does not impact other instruments.

6. The ACMA has also presented case studies for the use of telecommunications for which it claims wouldn't be possible without the use of MSP. For each of the case studies, Optus refutes that claim, including descriptions of how MSP provides an inferior experience to what can be provided through the legitimate use of numbers. This shows that the case studies can be, and are, provided to the market in manners consistent with the Numbering Plan. The case studies do not support the use of MSP in the market.

7. Optus reiterates that following the numbering rules does not preclude innovative products. Instead, it provides a structure for how it can be achieved within the regulatory construct on the use of numbers. The correct use of numbers will also ensure that Australian consumers are better protected and that national security and law enforcement concerns are addressed.

8. Number misuse continues to be a key cause of scam calls, and the increasing attention in this area is an indicator that this can no longer continue. Optus has long

advocated for the correct use of numbers to address the spoofing epidemic we now face. Consumer choice and competition can work in concert with scam reduction objectives, and Australia's competitive telecommunications environment can still provide this while restoring confidence in the use of Australian numbers.

Portability Service Suppliers Determination

9. Optus supports the remaking of this instrument, as Portability Service Suppliers continue to play an important part in number portability.

Proposed sunsetting of the Pre-Selection Determination

10. Although pre-selection has been heading towards a natural end, the remaining customer base, largely consisting of government entities on PABXs that Optus has no ability to reconfigure, will require an orderly transition to other services. Optus proposes that the Pre-Selection Determination be re-made either for a final year, or to align with the expiry of the ACCC's Wholesale Line Rental Declaration.

Structure of submission

11. The following sections of this submission provides feedback on the proposed changes to the Plan and associated instruments.

12. We also provide further information in relation to the case studies that are purported to support the need for MSP.

CHAPTER 1 – DICTIONARY

Definitions of IoT and related services

13. Definitions for IoT and related number types have been introduced to the Numbering Plan to support introduction of number types for these services.

Definition	Comment
internet of things data-only service means a carriage service that: (a) is only accessible on the carriage service provider's network; (b) is used for consumer and enterprise connected internet of things devices and applications; and (c) only requires access to data (internet protocol and non-internet protocol) services.	Optus has no objection to the definition; however, we are concerned that Schedule 5 places a limitation on these numbers where incoming international access is not available for off-net IoT numbers. This restriction is unnecessary and should be removed. There are also concerns that '09' ranges may look like a 'geo' number, similar to existing types such as '02' or '03'.
internet of things number means a special services number specified in Schedule 5 for use with an internet of things service or internet of things data-only service.	Optus has no objection to the definition; however, we are concerned that Schedule 5 places a limitation on these numbers where incoming international access is not available for this number type. This restriction is unnecessary and should be removed.
internet of things service means a carriage service that: (a) is used for consumer and enterprise connected internet of things devices and applications; and (b) requires the use of voice telephony and/or messaging services in addition to data (internet protocol and non-internet protocol services).	Optus has no objection to the definition; however, we are concerned that Schedule 5 places a limitation on these numbers where incoming international access is not available for this number type. This restriction is unnecessary and should be removed.

Definition of local service

14. The definition of local service has been amended to reflect number usage with portable services.

Definition	Comment
local service means a carriage service that: (a) is capable of voice telephony; and (b) is provided for one or both of the following: (i) receiving incoming calls at a location; (ii) making outgoing calls at a location; where that location is: (iii) a fixed location at the premises occupied or used by a customer; or (iv) a portable location.	Optus has previously submitted that the concept of a service needing to be identifiable by location is obsolete and undesirable from a privacy standpoint. While Optus has previously commented on the related topic of reforming SZUs, this change would remove anything "local" about the service. If this is to remain, the name may need further consideration. The inclusion of "*(iv) a portable location*" appears to be a middle-path between the current local service and the concept of a nomadic service.

Definition of mobile number

15. Definition of mobile number has been amended to remove ‘digital’ and to reflect status as a stand-alone number type.

<table>
<tr><th>Definition</th><th>Comment</th></tr>
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mobile number: see section 18.

18 Definition of mobile number

A mobile number is a number:
(a) beginning with the digits set out in column 1 of an item in the table of Schedule 4; and
(b) with the number of digits set out in column 2 of the item.

Schedule 4—Mobile numbers

Note See section 18

1 Mobile numbers

The following table sets out the form of mobile numbers, and provides information on the way in which the numbers can be used.

Mobile numbers

Item	Column 1 First digits	Column 2 Number of digits	Column 3 Is incoming international access available?	Column 4 Low charge number?
1	04	10	Yes	No
2	05	10	Yes	No

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Optus supports the name change from the ‘*digital mobile number’* to ‘*mobile number’*.

Optus agrees with this becoming a stand-alone number type, evolving from its “special service” status.

There are, however, issues with subsection 19 (1)(b) of *Division 3 – Mobile Numbers:*

19 Use of mobile numbers

(1) Subject to subsection (2), a mobile number may only be used for:
(a) a mobile service; or
(b) a service which is not permitted to use any other kind of number referred to in Chapter 2.

The proposed inclusion would make mobile numbers a catch-all where any service that is not defined in the plan, is to use a mobile number. This is overly broad and may lead to unintended consequences.

The use of mobile numbers should also still permit the use of IoT services.

Optus suggests that the ACMA give further thought to the inclusion of nomadic services, which may cover off future use-cases of non-mobile services.

The promotion of mobile numbers to a discrete number type would not impose a cost burden, so long as there is no material change to their current use.

We also note that the Communications Alliance submission has identified issues with section 19(3) & 19(4) with references to columns 3 & 4; and these should be examined.

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Definitions of public safety number and public safety service

Definition	Comment
public safety number means a special services number specified in Schedule 5 for use with a public safety service.	Optus has no objections to the inclusion of this definition. We note that Schedule 5 states ‘015’ numbers, yet does not include the ‘0444 444 444’ emergency alert number, or the minimum 10,000 number block.

Schedule 5—Special services numbers

Note: See sections 21, 22 and 31.

1 Special services numbers that are not shared

The following table sets out the form of special services numbers that are not shared numbers, and provides information on the way in which the numbers can be used.

Special services numbers (not shared)

Item	Column 1 First digits	Column 2 Number of digits	Column 3 Type of service	Column 4 Is incoming international access available?	Column 5 Low charge number?
6	015 10	9	Public safety service	No	No
7	01513	9	Public safety service	No	No
21	12 62	10	Public safety service	No	No

Note: Showing only 'Public safety numbers'. Others removed for clarity.

public safety service means a carriage service that is used by a recognised person who operates an emergency call service, as defined in section 19 of the Act, to assist them in the delivery of that service.

Section 19 of the Act may not be flexible enough a reference, as it is limited to the operation of emergency call service:

(a) operates an emergency call service; and
(b) is specified, in a written determination made by the ACMA for the purposes of this paragraph, as:
(i) a national operator of emergency call services; or
(ii) a regional operator of emergency call services.

Removal of redundant definitions

16. The definitions related to number types that are redundant have been removed. These were calling card service, paging number and premium rate number. We (the ACMA) have also removed some definitions related to these services.

Removed	Comment
calling card service ***paging number*** ***premium rate number***	Optus supports the removal of redundant definitions.

Chapter 3 - Specification of telephone numbers

Add mobile number as a discreet number type

Issue	Comment
Mobile numbers have been added as a separate number type to reflect their dominant use in communications. A new schedule (Schedule 4) has been added with number details. *Comment is invited on whether these provisions should be included in the new Numbering Plan.*	Optus supports mobile numbers being added as a separate number type, however, there are issues with subsection 19 (1)(b) of *Division 3 – Mobile Numbers:* **19 Use of mobile numbers** (1) Subject to subsection (2), a mobile number may only be used for: (a) a mobile service; or (b) a service which is not permitted to use any other kind of number referred to in Chapter 2.

Are there any specific cost burdens in relation to this proposal? If yes, please specify.

Schedule 4—Mobile numbers

Note See section 18

1 Mobile numbers

The following table sets out the form of mobile numbers, and provides information on the way in which the numbers can be used.

Mobile numbers

Item	Column 1 First digits	Column 2 Number of digits	Column 3 Is incoming international access available?	Column 4 Low charge number?
1	04	10	Yes	No
2	05	10	Yes	No

The proposed inclusion would make mobile numbers a catch-all where any service that is not defined in the plan, is to use a mobile number. This is overly broad and may lead to unintended consequences.

Optus suggests that the ACMA give further thought to the inclusion of nomadic services, which may cover off future use-cases of non-mobile services.

The promotion of mobile numbers to a discrete number type would not impose a cost burden, so long as there is no material change to their current use.

Add numbers related to IoT services as a subset of Special services numbers

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<tr><th>Issue</th><th>Comment</th></tr>
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IoT numbers have been added to reflect their growing usage and to reduce the need to use 04 numbers.

Details of the numbers have been added to Schedule 5.

Schedule 5—Special services numbers
Note: See sections 21, 22 and 31.

1 Special services numbers that are not shared
The following table sets out the form of special services numbers that are not shared numbers, and provides information on the way in which the numbers can be used.
<table>
<tr><th colspan="6">Special services numbers (not shared)</th></tr>
<tr><th>Item</th><th>Column 1
First digits</th><th>Column 2
Number of digits</th><th>Column 3
Type of service</th><th>Column 4
Is incoming international access available?</th><th>Column 5
Low charge number?</th></tr>
<tr><td>14</td><td>0910</td><td>10</td><td>Internet of things service</td><td>No</td><td>No</td></tr>
<tr><td>15</td><td>0920</td><td>10</td><td>Internet of things service</td><td>No</td><td>No</td></tr>
</table>
Note: Showing only ‘Internet of things service’. Others removed for clarity.

Comment is invited on whether there are any reasons not to introduce these number types and corresponding ranges for IoT services.

Do you support this initiative?

Is the quantity of numbers proposed to be included in the ranges appropriate for the proposed use?

Are there any specific cost burdens in relation to this proposal? If yes, please specify.
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Optus supports the inclusion of specific ranges for IoT use, although we are concerned that Schedule 5 places a limitation on these numbers where incoming international access is not available for this number type, particularly for off-net capable numbers. This restriction is unnecessary and should be removed.

Although it would be desirable for IoT services to use number ranges that have lesser annual numbering charges than standard mobile numbers, this should not preclude IoT services from using mobile numbers. Some devices will already be deployed in remote systems and it would be cost prohibitive to alter or replace them out of phase. Some management systems currently in use may not be able to immediately switch number range use and will still use mobile numbers. Over time, this usage will likely reduce.

Other costs incurred would relate to updating systems and network conditioning. Sufficient time would be required for implementation, which would likely take 18 months.

The numbering plan would allow for 60 million IoT numbers, which is likely to be sufficient in coming years, although consideration should be given to future expansion as required.
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Add public safety numbers as a subset of special services numbers

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Public safety numbers have been added to reflect their use and prevent inadvertent repurposing of these number ranges.

Details of the numbers have been added to Schedule 5 and Schedule 7.

Schedule 5—Special services numbers

Note: See sections 21, 22 and 31.

1 Special services numbers that are not shared

The following table sets out the form of special services numbers that are not shared numbers, and provides information on the way in which the numbers can be used.

Special services numbers (not shared)

Item	Column 1 First digits	Column 2 Number of digits	Column 3 Type of service	Column 4 Is incoming international access available?	Column 5 Low charge number?
6	015 10	9	Public safety service	No	No
7	01513	9	Public safety service	No	No
21	12 62	10	Public safety service	No	No

Note: Showing only 'Public safety numbers'. Others removed for clarity.

Schedule 7—Size of standard unit

Note: See the definition of ***standard unit*** in section 5.

1 Size of standard unit for different types of number

The following table sets out the quantity of numbers in a standard unit for different types of numbers.

Note: Numbers are commonly allocated in standard units, and are preferably surrendered in standard units.

Size of standard unit for different types of number

Item	Type of number	Quantity of numbers in standard unit
1	Geographic numbers other than for allocation in designated standard zone units	1 000
2	Geographic numbers for allocation in designated standard zone units	100
3	Freephone numbers	1
4	Mobile numbers	10 000
5	Local rate numbers	1
6	Special services numbers specified for use with a satellite telephone service	10 000
7	Special services numbers specified for use with a data network access service, 5 digits long	1
8	Special services numbers specified for use with a data network access service, 10 digits long	1 000
9	Special services numbers specified for use with a community service	1
10	Special services numbers specified for use with an operator service, 5 or 6 digits long	1
11	Special services numbers specified for use with an operator service, 7 digits long	10
12	Special services numbers specified for use with an internal network service	1 000
13	Special services numbers specified for use with a testing service	100
14	Special service numbers specified for use with an internet of things service	10 000
15	Access codes	1

Comment is invited on whether there are any reasons not to introduce this number type and corresponding ranges.

Are there any specific cost burdens in relation to this proposal? If yes, please specify.

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Optus supports the addition of public safety numbers.

Public safety numbers don't appear to be mentioned in Schedule 7.

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Removal of redundant number types

Issue	Comment
Premium rate numbers, calling card service and paging service have been removed as those number types are no longer in use. Details in the schedules have been amended accordingly. *Comment is invited on whether there are any reasons to retain these number types.* *Are there any specific cost burdens in relation to this proposal? If yes, please specify.*	Optus supports the removal of redundant number types. No significant costs are expected in relation to this proposal.

CHAPTER 7 - SPECIAL RULES ABOUT SMARTNUMBERS

Addition of provisions for cancellation of EROU where the numbers are used for scams

Issue	Comment
To enhance the ACMA's scam reduction work, provisions have been added to allow the cancellation of EROU where a smartnumber has been used to make scam calls. An associated review of decisions provision has also been added in section 119. *Comment is invited on whether these provisions should be included in the new Numbering Plan. If not, why not?* *In deciding whether to cancel EROU where a smartnumber has been used for scam calls, what should the ACMA consider?* *Is 5 business days sufficient time for an EROU to respond to a notification of any proposed cancellation?* *Are there any specific cost burdens in relation to this proposal? If yes, please specify*	Optus supports the ability of the ACMA to cancel the EROU of a smartnumber that has been used in relation to scam calls, although the numbering plan already prohibits the use of a smartnumber (as a *local rate service*) for outgoing calls: ***local rate service*** means a carriage service: (a) that is capable of voice telephony; and (b) that, for a call, involves the translation of the number dialled in making the call to a number that identifies a point of termination for the call; and (c) that is not a local service; and (d) that is provided for receiving incoming calls but cannot be used to make outgoing calls; and (e) for which: (i) the call charge for calls made using a standard telephone service (other than a public mobile telecommunications service) is equal to, or less than, the call charge for local calls; and (ii) responsibility for the residual charge for calls (if any) lies with the person to whom the dialled number is issued. This is also prohibited by Industry Code C661:2022 Reducing Scam Calls and Scam SMs: 4.2.4 C/CSPs must not send calls to B-Parties on their own Telecommunications Network or XPOI to the Transit C/CSPs or Terminating C/CSPs where 13/1300/1800/1900 Australian Numbers are being used as A-Party CLI. Optus knows that there are C/CSPs that are seemingly allowing calls to originate or transit using these numbers, as Optus is regularly blocking these calls. The ACMA can refer to Optus' quarterly 'Scam Code' reports for quantities. Smartnumbers may be used as a Scam Callback number, where an SMS is sent to a potential victim, inducing them to call a number under false pretences. Optus pioneered 'Call Stop' in order to counter this type of scam. Optus views 5 days as sufficient for an EROU to respond to a proposed notification of cancellation.

Chapter 11 – General matters relating to administration, review and reporting

Addition of provision relating to use of computer programs

Issue	Comment
At section 124, an additional provision has been added to allow us to substitute a decision for a decision (the initial decision) made by the operation of a computer program if we are satisfied the initial decision is incorrect. *Comment is invited on whether this provision should be included in the new Numbering Plan. If not, why not?*	Optus agrees with the inclusion of this clause. It is reasonable that the ACMA be able to correct an error in a decision that was made by a computer program.

Further changes to be considered

Principles-based Numbering Plan

Issue	Comment
Consider relevant principles and concepts that may be useful to guide the future development and evolution of the Numbering Plan. Consider whether a principle-based Numbering Plan where detailed operational procedures and requirements would be set out in industry codes and guidelines is achievable. The ACMA acknowledges there are disparate views across industry on many numbering issues, potentially impacting code development timeframes.	Optus supports a principles-based Numbering Plan, with further details to be covered as appropriate in Industry Codes or guidelines.

CSP registration

Issue	Comment
Consider introduction of further provisions that specify CSP registration being a pre-requisite to CSPs being allocated, sub-allocated, holding, issuing, or using numbers. This consideration is dependent on the outcome of a CSP registration or licensing scheme initiative led by Department of Infrastructure, Transport, Regional Development, Communications and the Arts.	Optus supports the introduction of a CSP registration scheme. On its introduction, it would be reasonable to have registration as a pre-requisite for the allocation, sub-allocation, holding, transfer, or issuing of numbers.

Allocation application processes

Issue	Comment
Consider whether ACMA should update its application forms for the allocation, transfer and surrender of numbers to request additional information from CSPs such as (for example) intended use of numbers they are applying for and whether they are able to support relevant requirements such as portability.	Optus supports the ACMA updating number allocation forms for applicants to confirm that they will be using numbers in accordance with their permitted use and the capability of the CSP to support portability (where required). This should not require additional information to be supplied by the applicant. Such a declaration would be unnecessary on the surrender of numbers.

Number range for nomadic services

Issue	Comment
Consider whether a new number range for geographically unrestricted/nomadic services should be introduced. This alternate number range has predominately been suggested and supported by CSPs who are simultaneously seeking to restrict use of mobile numbers to services originating on mobile networks to address the problem of scams. The ACMA notes the failure in take up of the Location Independent Communication Services 0550 number range that was previously introduced to the Numbering Plan and the difficulties establishing interconnect agreements. We also note the withdrawal of similar number types and ranges in other jurisdictions. The ACMA considers further research and consultation is required into consumer and business preferences and perceptions, as well as trust of new and unfamiliar numbers. Other factors for consideration include the impact on competition, costs to industry, success or otherwise of introduction of similar ranges in other jurisdictions on total scam traffic, and the regard to concepts such as technical neutrality.	Optus supports the establishment of nomadic number ranges. Optus has noted in our previous submissions that mobile numbers are being misused, which has seen a loss of trust in this number type.

Multiple use of numbers

Issue	Comment
Noting the ACMA's preliminary position not to prohibit the legitimate use of MSP, the work program could include a project to identify changes in legislation, other instruments, and arrangements to support legitimate use of MSP by CSPs. See section 2.3 below.	There is no legitimate use of the MSP practice. Optus has previously provided detailed information on this topic in the July 2024 round of consultation on the Numbering Plan. Optus has also provided further commentary later in this document on the supposed use-cases that have been described in error as being reliant on MSP. To assist the ACMA in identifying changes in legislation and other instruments that would require changes, Optus submits the following as a starting point for the ACMA: **Mobile Number Portability (MNP)** - CA C570:2009 MNP Industry Code - ACCC Direction to ACA (ACMA) on MNP of October 1999 - Telecommunications Numbering Plan 2015 **Local Number Portability (LNP)** - CA C540:2013 LNP Industry Code - ACCC Direction to ACA (ACMA) on LNP of September 1997 - Telecommunications Numbering Plan 2015 **IPND** - CA C555:2024 IPND Industry Code **Telecommunications Act 1997 (Division 3A and Schedule 2 (Part 4))** **Handling of Life Threatening and Unwelcome Communications Industry Code CA C525:2017** [Unwelcome Calls & SMS tracing] **Telecommunications Numbering Plan 2015** [Numbering] **Telecommunications (Annual Charge) Determination 2014** [Number Tax] **Telecommunications (Interception and Access) Act 1979** [ICP, LI, DR, Assistance to law enforcement & national security agencies] **Telecommunications Act 1997** [Assistance to law enforcement & national security agencies, Part 14 & Part 15]

	Telecommunications Emergency Call Services Determination 2019 [Location information]

Removal of standard zone units (SZUs)

Issue	Comment
While SZUs are still required for some services and several existing telecommunications policies and obligations that rely on the framework, IP telephony services have reduced the points of interconnect between carriers decreasing their relevance. CSPs confirmed that making changes to SZUs, whether significant or incremental, will require substantial work effort and expense. The work program could consider timing and pathways for the phase-out of SZUs in the future and implications and opportunities of this change to evolve the Numbering Plan.	Consumer phone plans typically refer to "national" calls. The concept of a local call is outdated, as Telstra has closed and sold off many local exchanges and VOIP has drastically reduced the points of interconnect between carriers. Fewer consumers every year purchase or hold a landline with a local number, and the prefixes of phone numbers have become less and less meaningful. Almost every carrier offers a voice bundle of inclusive calls and the concept of a cheaper local call has become meaningless to the few remaining consumers who still purchase a local number. Under the existing plan the ACMA already issues blocks of local numbers with broad geographic significance. It would make sense to get rid of SZUs and reclassify all existing local number ranges that are currently associated with a SZU to become numbers of broad geographic significance that are state based only.

Short codes

Issue	Comment
Consider the utility of introducing additional new short codes for community service purposes to support uses such as the 3498 short code used in the 3G shutdown.	Optus supports the expansion of short codes that are available for community service purposes.

Case Studies

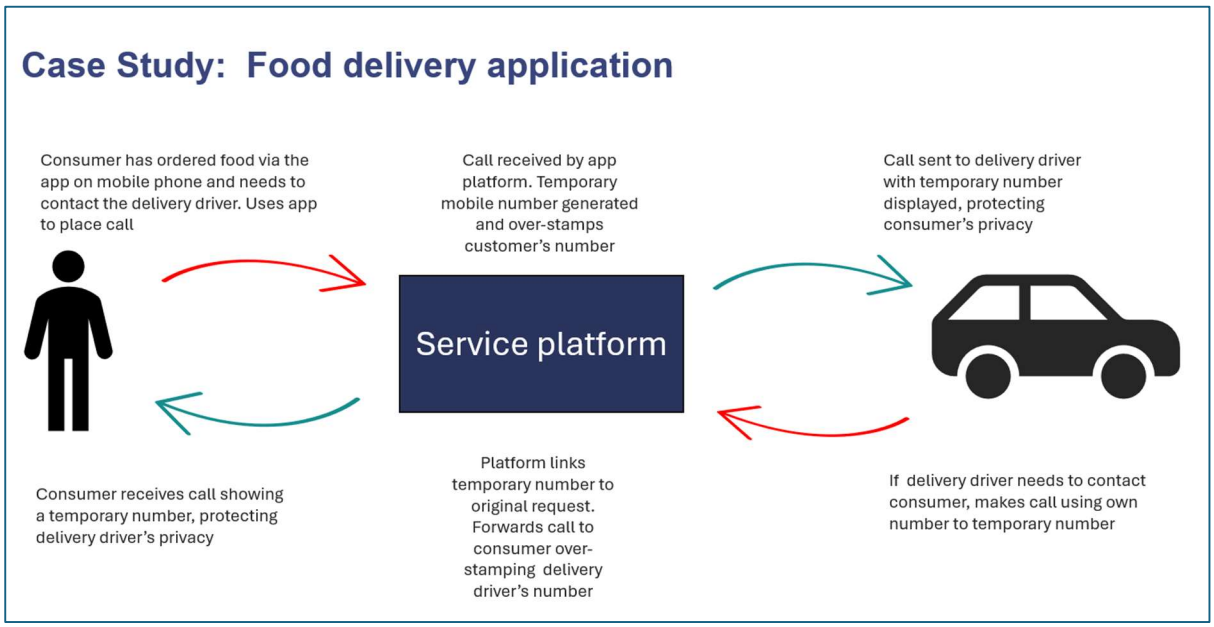
This section provides comments on the case studies included in the consultation paper. The case studies are used to support the case for MSP. However, it is shown below that these use cases can, and are, supplied in the market in a manner consistent with existing laws. Optus submits that these uses cases demonstrate non-compliance rather than examples supporting changes to the Numbering Plan.

Case Studies:

According to the consultation paper, the following describes how a food delivery app facilitates voice calls between the consumer and the delivery driver:

> **[ACMA supplied] Case study: Food delivery application**
>
> A common example of where this practice may benefit the average customer is where a meal is ordered through a delivery software app, and the job assigned to a delivery driver. If the driver needs to contact the customer, they can place a call to the customer using the call function in the delivery app.
>
> The app will over-stamp the driver's number with a temporary number so that their personal CLI is not displayed. The reverse is also available, as the customer can contact the driver via the app, and their CLI is also over-stamped.
>
> The MSP function enables both the driver and rider to maintain privacy as it does not require the exchange of personal information. Withholding the CLI may not be a desirable choice for either party, given the temporary number is a useful identifier for drivers that may be completing deliveries simultaneously.

The consultation paper contained the following diagram of the above process:

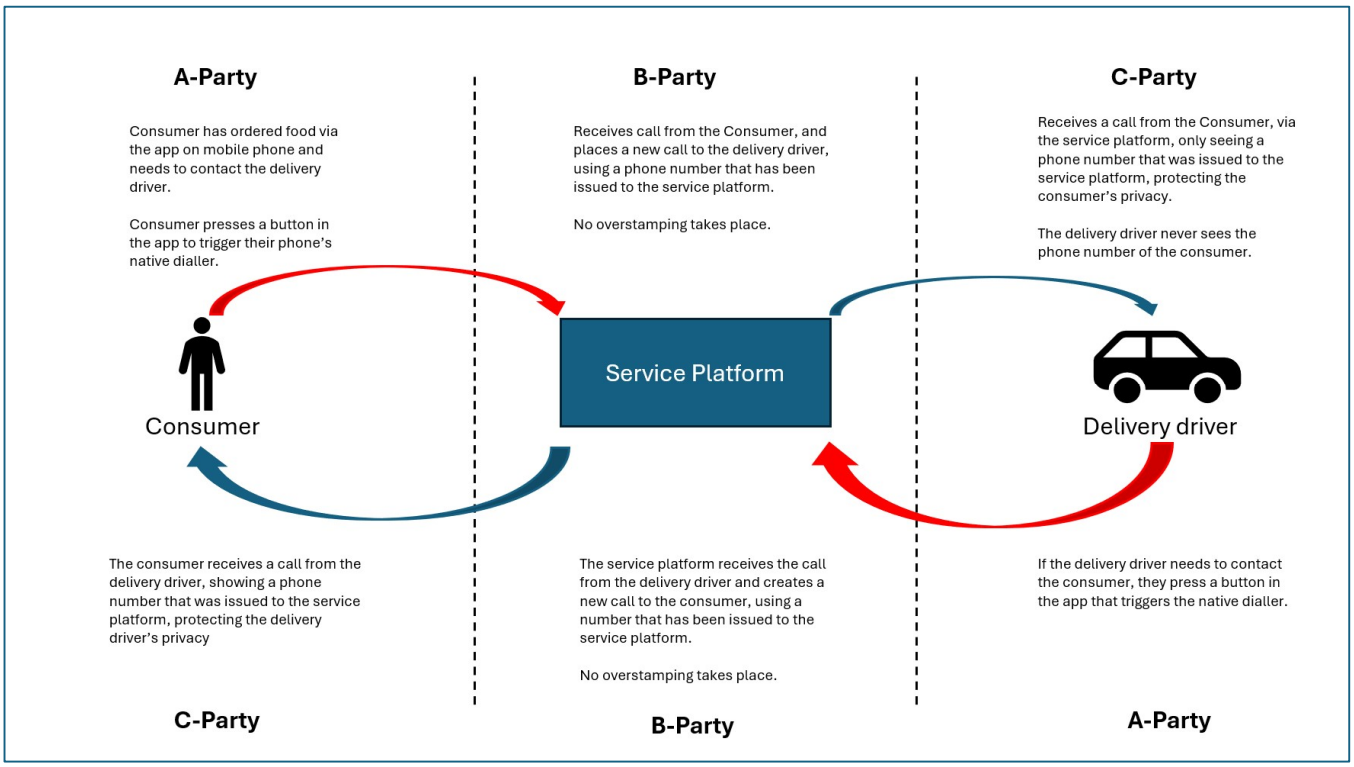


This is a misunderstanding as to how this technology works.

[Actual] Case study: Food delivery application

A consumer orders a meal through a delivery app, and the job is assigned to a delivery driver. If the driver needs to contact the customer, they can place a call to the consumer using the call function in the delivery app.

The app will trigger the native dialler on the delivery driver's phone, and will place a call to the service platform, which has a number range issued to it by its CSP for the purpose of maintaining the privacy of both the delivery driver and the consumer. The service platform creates a new call to the consumer, using one of the phone numbers in the range they have been allocated.

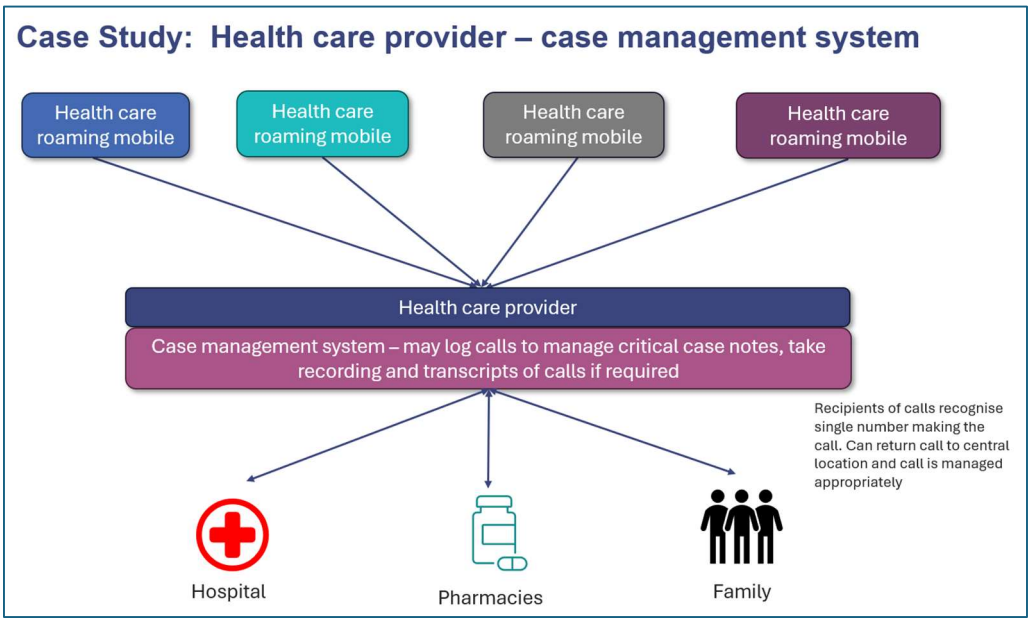


[ACMA supplied] Case study: Customer relationship management software – health care industry

The MSP can assist companies that use customer relationship management (CRM) software to track calls.

For example, a health care service may have case workers in the community making calls on their personal phones on behalf of patients, such as calls to family members, pharmacies, or medical professionals. Calls are placed via the CRM software, and outgoing calls are over-stamped with the health service's main number. This allows for easier identification of the business making the call. If a call is not answered, the case worker can update the patient's record in the CRM software with the call purpose and any specific notes. Return calls are received by the main business number and the call recipient can review the patient's file, see the record of the call, read the case notes and action the call accordingly.

In the health and aged care industries, these types of interactions can be vital for enabling the best care for patients, as all interactions are logged, and case notes can be kept up to date. Some CRM software allows for extra services, such as call recordings for record keeping purposes.



Further commentary from ACMA:
If the MSP practice were to be prohibited, end-users will not be able to access the same benefits by simply porting or obtaining additional numbers. Current business models would also be disrupted, and the market made less competitive.

17. As demonstrated in this document, each of the examples that allegedly require MSP, do not actually require it, and in the healthcare use case, MSP provides an inferior service (as shown below).

[Actual] Case study: Customer relationship management software – health care industry

The proper use of numbers can ensure the most capable and fully featured customer relationship management (CRM) system with voice call integration to make and receive phone calls from multiple locations and devices, all using the same centralised phone number.

For example, a health care service uses a voice call plugin for their CRM, and have arranged to use their current telecommunication provider or have ported their number or number ranges to the provider of their choice.

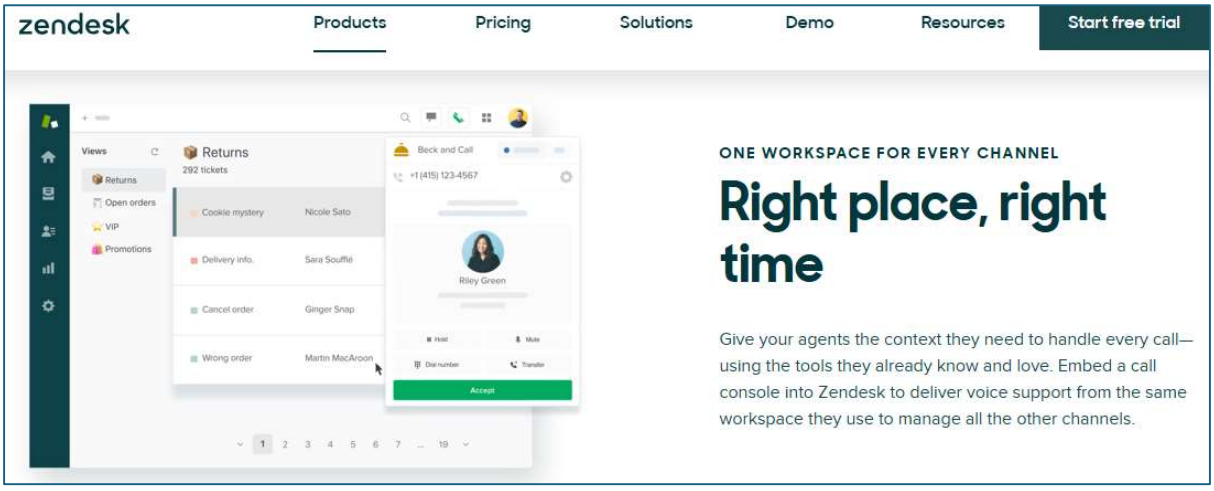
By using the telecommunication provider that holds the number or number ranges, the health care organisation can receive calls through their CRM as well as make outbound calls through their CRM, ensuring that all communications can be tracked and recorded through the CRM, resulting in the most complete patient records possible.

By having inbound calls integrated into the CRM, the health care provider can identify patients, health care practitioners and suppliers as they receive calls.

Patients can also identify the health care service as the calls are utilising the standard phone number of the health care provider. If a patient misses the call, they can call back the same number, which will be answerable through the voice call integration of the CRM.

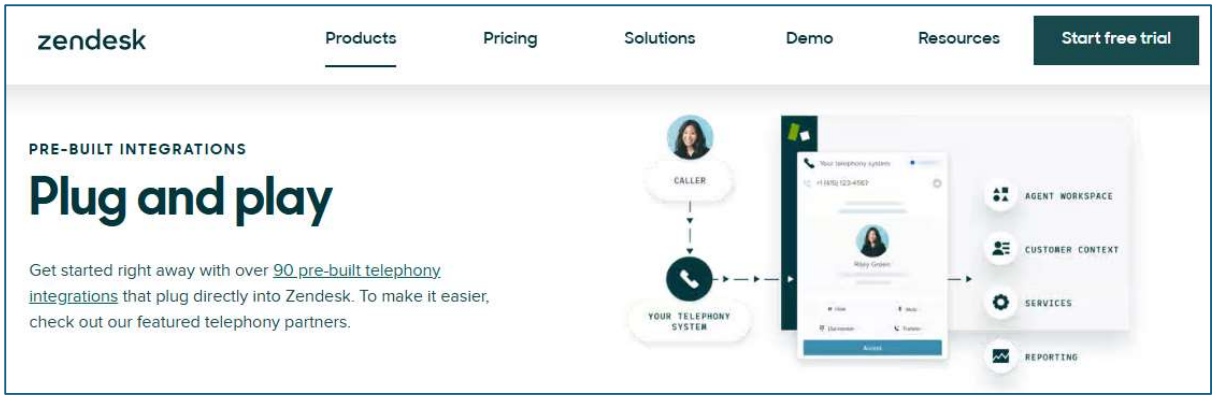
18. It is clear that these services do not require the prohibited MSP practice, which contravenes the regulatory construct on the use of numbers. The MSP practice also provides an inferior solution, as it doesn't allow for the return path of calls back into the CRM through the voice call integration plugin.

19. For an example of how this works with popular CRM and voice integration products, Zendesk, is a CRM used in healthcare, which includes options for voice call integration.



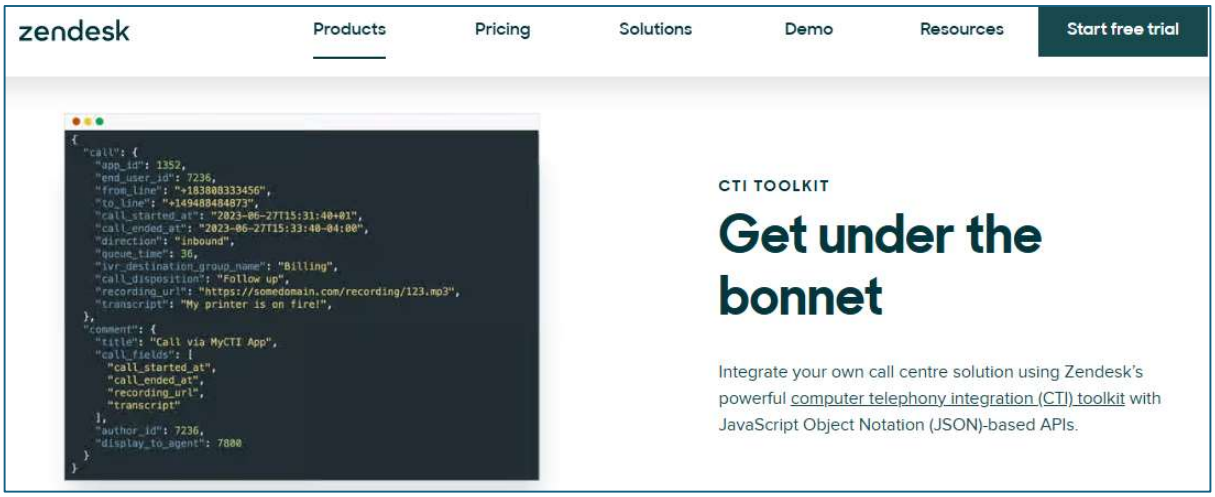
Source: https://www.zendesk.com/au/service/voice/talk-partner-edition/

20. Zendesk has options for over 90 telephony integration plugins.



Source: https://www.zendesk.com/au/service/voice/talk-partner-edition/

21. Zendesk also allows for customers to integrate their own voice solutions into their CRM.

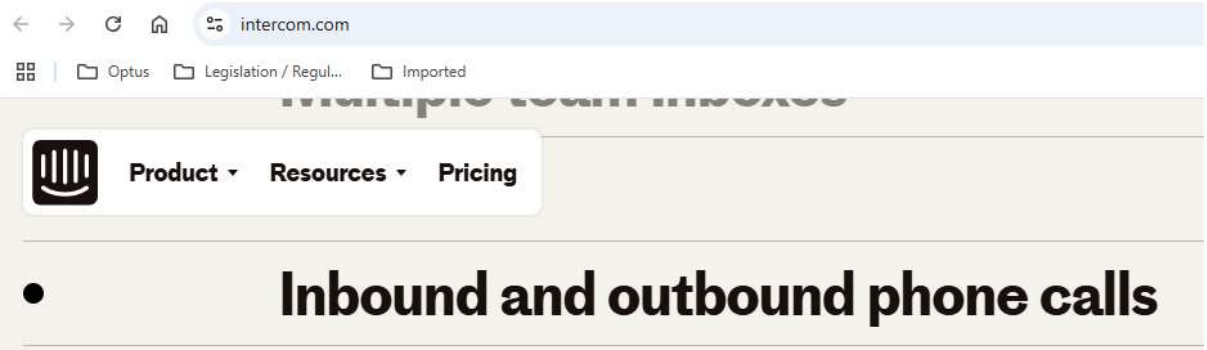


Source: https://www.zendesk.com/au/service/voice/talk-partner-edition/

22. One of the voice telephony products that can be integrated into Zendesk and other popular CRMs is Aircall, which states that customers can have new numbers created or they can port-in their existing numbers.

23. Similarly, Cloudtalk, another voice telephony plugin for CRMs, including Zendesk, also state they have an ability to port-in numbers.

24. Another Zendesk telephony plugin, 'Intercom' also states that their technology can be used for inbound and outbound calls.



Source: Intercom.com

25. Local Number Portability has clearly resulted in a highly competitive telecommunications market, which does not require practices not permitted under the Numbering Plan in order to provide fully capably telecommunication services through a broad range of suppliers.

26. Optus submits that none of these case studies provides support for the use of MSP.

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

27. Optus supports the ACMA's proposal to remake the Portability Service Suppliers Determination.

28. Portability Service Suppliers continue to play an important role in number portability, and such arrangements should countinue.

Proposed sunsetting of the Telecommunications (Provision of Pre-selection) Determination 2015

29. While pre-selection is moving towards its natural end, the remaining traffic will require careful management of customers, with sufficient notice to migrate their longstanding arrangements away from pre-selected services.

30. It is Optus' view that it is not feasible to conduct an orderly transition of this remaining traffic prior to a proposed sunsetting of the Pre-Selection Determination on 1 April 2025.

31. Optus proposes 2 options:

    (a) Remake the Pre-Selection Determination for a period to align with the expiration of the ACCC's Wholesale Line Rental declaration, to 30 June 2029; or

    (b) Remake the Pre-Selection Determination for a period of 1 year, with a stated expectation that this will be the final time.

32. Recent traffic analysis shows that there is still significant pre-selected traffic on the Optus network, overwhelmingly from government customers. These customers likely have longstanding settings in place on PABX equipment that they own and operate, and for which Optus has no access, nor ability to alter.

33. By remaking the Determination for a final period (and stating it as such), customers can be given sufficient notice to plan an orderly transition to other telecommunication arrangements.