



Date: 12th of February 2025

Submission to ACMA – Consultation Response to Numbering Plan and other instruments – Proposed Changes.

Virtutel Pty Ltd (“Virtutel”) welcomes being able to respond to the Proposed Changes to the Numbering Plan and other instruments. Virtutel broadly agrees with the response that will be tabled by the Communications Alliance; however we believe that the number range and type allocated for IOT services in the range of (09 0,1,2xx) **should be broadened** to include the definition of use for geographically unrestricted/nomadic services.

The ACMA needs to take this opportunity to include this definition now to allow time for the development of Interconnect and Bi-lateral agreements between carriers. The use cases defined for IOT Services (that being for Data, Voice, Messaging) also apply to geographically unrestricted/nomadic numbers.

The use of this number range promotes the non-use of the existing mobile number ranges as a geographically unrestricted/nomadic like substitute, thus leaving numbers in the ranges defined for their intended use for a “Mobile” service. This lessens demand on the number allocations in the existing mobile number ranges and provides trust to the public receiving calls from this range that the call has originated from a “Mobile” service.

We believe there is more support now between carriers for a location independent range to be reintroduced based on the current use of Mobile numbers as a substitute for this use case and the now wide adoption of VoIP compared to when this was first introduced. As noted by the ACMA, these ranges may have been withdrawn from use in other jurisdictions, however we believe they may have been for various reasons, including the small geography of the jurisdiction or further relaxation of the use of existing geographic number ranges to support location independence and other services such as messaging.

Virtutel believes that 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 is no different to that of implementing the new range for IOT services and the geographically unrestricted/nomadic use case should be included within its definition.