

**COMMUNICATIONS
ALLIANCE LTD**



**PROPOSED CHANGES TO THE NUMBERING PLAN
AND OTHER INSTRUMENTS**

COMMUNICATIONS ALLIANCE SUBMISSION
FEBRUARY 2025

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INTRODUCTION

Communications Alliance (CA) welcomes the opportunity to provide this submission in response to the ACMA consultation paper on *Proposed changes to the Numbering Plan and other instruments* (the consultation paper).

Communications Alliance

Communications Alliance is the primary communications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including carriers, carriage and internet service providers, content providers, platform providers, equipment vendors, IT companies, consultants and business groups.

Its vision is to be the most influential association in Australian communications, co-operatively initiating programs that promote sustainable industry development, innovation and growth, while generating positive outcomes for customers and society.

The prime mission of Communications Alliance is to create a co-operative stakeholder environment that allows the industry to take the lead on initiatives which grow the Australian communications industry, enhance the connectivity of all Australians and foster the highest standards of business behaviour.

For more details about Communications Alliance, see <https://www.commsalliance.com.au>.

1 Summary

CA supports many of the proposals to make the *Draft Telecommunications Numbering Plan 2025* (draft Numbering Plan) as provided for comment, including key changes to support:

- The introduction of new number ranges for internet of things services;
- For reclassification of mobile numbers as their own number type; and
- For the removal of redundant or low use number types and ranges.

CA supports the ACMA proposal to make the *Telecommunications (Section of the Telecommunications Industry – Portability Service Suppliers) Determination 2025*.

There may not be a single industry view on some topics (e.g. the 'use of numbers') and CA recommends ACMA refer to individual CA member submissions on these topics.

Some CA members have a range of views on some of the proposed definitions (e.g. for local service, mobile number) and other matters. Please refer to individual CA member submissions for more information.

2 Proposed changes in the draft Numbering Plan 2025 and issues for comment

Chapter 1– Dictionary

Change	Description	CA Comment
Definitions of IoT and related services	<p>Definitions for IoT and related number types have been introduced to the Numbering Plan to support introduction of number types for these services.</p> <p>Comment is invited on whether the proposed definitions accurately reflect the services.</p>	<p>The definition of an IoT number type should reference Machine-to-Machine (M2M) and Telemetry services to avoid possible confusion about their applicability e.g. by adding a note under each definition.</p> <p>Please refer to individual CA member submissions for additional comments on the definitions for IoT and related number types.</p>
Definition of local service	<p>The definition of local service has been amended to reflect number usage with portable services.</p> <p>Comment is invited on whether the proposed definition accurately reflects the service.</p>	<p>Some CA members think the proposed amendment of the definition of “local service” may have unintended consequences and requires further consideration by ACMA.</p> <p>Please refer to individual CA member submissions for more information.</p>
Definition of mobile number	<p>Definition of mobile number has been amended to remove 'digital' and to reflect status as a stand-alone number type.</p> <p>Comment is invited on whether the proposed definitions accurately reflect the services.</p>	<p>CA supports amending the definition of a “mobile number” to reflect its status as a stand-alone number type and to remove “digital”.</p> <p>There are a range of views among CA members on the proposed section 19(1)(b) of the draft Numbering Plan. Please refer to individual CA member submissions for more information.</p> <p>CA suggests some editorial changes:</p>

Change	Description	CA Comment
		<p>(i) the deletion of section 19(3) of the draft Numbering Plan, because it is redundant i.e. there is no "NO" in column 3 of Schedule 4.</p> <p>(ii) the consequential renumbering of section 19(4) of the draft Numbering Plan as section 19(3),</p> <p>(iii) in the now renumbered section 19(3) change "column 4" to "column 3" – because, in Schedule 4, column 4 is "low charge" and column 3 is "incoming international access".</p>
<p>Definitions of public safety number and public safety service</p>	<p>Definitions for public safety number and public safety service have been added to support introduction of numbers for these services.</p> <p>Comment is invited on whether the proposed definitions accurately reflect the services.</p>	<p>The definition for public safety number and public safety service does not appear to include the number for emergency alert (i.e. 0444 ...).</p>
<p>Removal of redundant definitions</p>	<p>The definitions related to number types that are redundant have been removed. These were calling card service, paging number and premium rate number. We have also removed some definitions related to these services.</p> <p>Comment is invited on whether any definitions proposed for removal should be retained. If yes, please specify why.</p>	<p>CA submits that the Numbering Plan should not retain the definitions related to redundant number types proposed for removal.</p> <p>CA supports the removal of premium rate numbers, calling card numbers and paging numbers.</p>

Chapter 3 – Specification of telephone numbers

Change	Description	CA Comment
<p>Add mobile number as a discrete number type</p>	<p>Mobile numbers have been added as a separate number type to reflect their dominant use in communications.</p> <p>A new schedule (Schedule 4) has been added with number details.</p> <p>Comment is invited on whether these provisions should be included in the new Numbering Plan.</p> <p>Are there any specific cost burdens in relation to this proposal? If yes, please specify.</p>	<p>CA supports the addition of mobile numbers as a separate number type.</p> <p>There is further work required on the specification of mobile numbers and IoT numbers to avoid unintended consequences.</p> <p>Please refer to individual CA member submissions for more information.</p>
<p>Add numbers related to IoT services as a subset of Special services numbers</p>	<p>IoT numbers have been added to reflect their growing usage and to reduce the need to use 04 numbers.</p> <p>Details of the numbers have been added to Schedule 5.</p> <p>Comment is invited on whether there are any reasons not to introduce these number types and corresponding ranges for IoT services.</p> <p>Do you support this initiative?</p> <p>Is the quantity of numbers proposed to be included in the ranges appropriate for the proposed use?</p> <p>Are there any specific cost burdens in relation to this proposal? If yes, please specify.</p>	<p>CA supports the introduction of new number range(s) for IoT services.</p> <p>The proposed definitions for number types that may be associated with an IoT service require further clarification. For example, portability is not needed for a number type that is associated with an 'on net' service.</p> <p>Please refer to individual CA member submissions for more information on this. The draft Numbering Plan provides for a total of 60 million number, which is expected to be sufficient for the next five to ten years. Provision should be made to increase these ranges in the future to cater for the demand.</p>

Change	Description	CA Comment
		<p>Cost burdens for CA members would be typical of those required for establishing a new number type e.g. for network conditioning, updates to IT systems for operations and billing. Timing and scheduling will also be an issue e.g. at least 18 months required for implementation.</p> <p>Specific costs are sensitive commercial information, so please refer to individual CA member submissions on this.</p>
<p>Add public safety numbers as a subset of special services numbers</p>	<p>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. 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.</p>	<p>.Communications Alliance supports the introduction of a number type for public safety numbers.</p> <p>Cost burdens for CA members would be typical of those required for establishing a new number type e.g. for network conditioning, updates to IT systems for operations and billing.</p> <p>Specific costs are sensitive commercial information, so please refer to individual CA member submissions on this.</p>
<p>Removal of redundant number types</p>	<p>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.</p>	<p>CA supports the removal of premium rate numbers, calling card numbers and paging numbers.</p> <p>No significant cost issues are expected</p>

Chapter 7 – Special rules about smartnumbers

Change	Description	CA Comment
<p>Addition of provisions for cancellation of EROU where the numbers are used for scams</p>	<p>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.</p> <p>Comment is invited on whether these provisions should be included in the new Numbering Plan. If not, why not?</p> <p>In deciding whether to cancel EROU where a smartnumber has been used for scam calls, what should the ACMA consider?</p> <p>Is 5 business days sufficient time for an EROU to respond to a notification of any proposed cancellation?</p> <p>Are there any specific cost burdens in relation to this proposal? If yes, please specify</p>	<p>Communications Alliance supports the cancellation of EROU associated with a smartnumber where the smartnumber has been used in activity related to a scam.</p> <p>It is unclear why ACMA proposes this cancellation for "where a smartnumber has been used to make scam calls" because one cannot initiate a call with a smartnumber – they are a subset of freephone numbers and local rate numbers, for inbound only use.</p> <p>If a smartnumber is confirmed as being used in an activity related to a scam the suggested five business days is more than sufficient.</p> <p>Specific costs are sensitive commercial information, so please refer to individual CA member submissions on this.</p>

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

Change	Description	CA Comment
<p>Addition of provision relating to use of computer programs</p>	<p>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.</p>	<p>CA submits that this proposed provision seems to be a sensible precaution to allow the correction of an error.</p>

Change	Description	CA Comment
	Comment is invited on whether this provision should be included in the new Numbering Plan. If not, why not?	

3 Potential changes to be considered post remake

Addressing Section 2.2 in the consultation paper.

Issue	Description	CA Comment
Principles-based Numbering Plan	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.	CA has long supported a move to a principle-based Numbering Plan where detailed operational procedures and requirements would be set out in industry codes and guidelines.
CSP registration	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.	CA notes that after the release of the ACMA discussion paper, Minister Rowland announced on 21 January 2025 that there will be a register of CSPs. CA looks forward to contributing to the work by ACMA on this topic.
Allocation application processes	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.	CA supports ACMA updating its application forms.

Issue	Description	CA Comment
<p>Number range for nomadic services</p>	<p>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.</p> <p>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.</p> <p>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.</p>	<p>There are differing views among CA members on the topic of nomadic services.</p> <p>Cost burdens for CA members would be typical of those required for establishing a new number type e.g. for network conditioning, updates to IT systems for operations and billing. Timing and scheduling will also be an issue.</p>
<p>Rights of use</p>	<p>Noting the increasing importance and connection of end-users to their numbers, the increasing array of enhanced services they may want to access using a number and the role of numbers in identity verification processes, a numbering work</p>	<p>CA would welcome ACMA making available more information on this topic.</p>

Issue	Description	CA Comment
	program may consider whether strengthening or enhancing a customer's right of use to a number and CSPs obligations is warranted.	
Multiple use of numbers	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 are differing views among CA members on the topic of MSP. Please refer to individual CA member submissions on this.
Removal of standard zone units (SZUs)	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.	CA notes possible implications for a work program that "could consider timing and pathways for the phase-out of SZUs in the future" include: 1. A need to address obligations in Part 4 of the <i>Telecommunications (Consumer Protection and Service Standards) Act 1999</i> (on continued access to untimed local calls). 2. A need for changes to existing commercial contracts affected by possible future changes to or removal of SZUs. CA considers that this is of a lower priority than other potential changes post remake
Short codes	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.	CA members believe there is potential to expand the use of the community service number type for new short code use. CA looks forward to contributing to the work by ACMA on this topic.

4 Scams and use of numbers

CA notes that ACMA has provided an update on the work by ACMA to date but has not requested comment on this section of the consultation paper.

CA appreciates the update by ACMA on its thinking about MSP since the previous consultation in June-July 2024, including that further work is required and "These matters will require comprehensive consultation with industry given the technical capabilities required, risks to legitimate traffic and burden to implement".

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

ACMA: Comment is invited on the ACMA's proposal to make the draft Telecommunications (Section of the Telecommunications Industry – Portability Service Suppliers) Determination 2025.

Consistent with its submission in July 2024, Communications Alliance recommends ACMA make the *Telecommunications (Section of the Telecommunications Industry – Portability Service Suppliers) Determination 2025* because Portability Service Suppliers continue to play a significant role in number portability.

As noted in the ACMA discussion paper of June 2024, this "would continue to identify that the parties providing portability services are participants in the telecommunications industry".

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

6.1. Requirements of the Determination

ACMA: Comment is invited to clarify whether, if the Pre-selection Determination is allowed to sunset, the definition for a pre-selection verification service should remain in the Numbering Plan.

There may be differing views among CA members on whether the definition for a pre-selection verification service should or should not remain in the Numbering Plan. Please refer to individual CA member submissions on this for more information.

6.2. Sunset of the Pre-selection Determination

ACMA: Comment is invited on the ACMA's proposal to allow the Pre-selection Determination to sunset on 1 April 2025.

There may be differing views among CA members on the ACMA proposal to allow the *Telecommunications (Provision of Pre-selection) Determination 2015* to sunset on 1 April 2025. Please refer individual CA member submissions on this for more information.



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