

12 February 2025

The Manager  
Numbering Policy and Regulation Section  
Australian Communications and Media Authority  
Via email: [numberingplanreview@acma.gov.au](mailto:numberingplanreview@acma.gov.au)

## **Re: Proposed changes to the Numbering Plan and other instruments Consultation paper**

Aussie Broadband Limited (Aussie Broadband) welcomes the opportunity to review and provide feedback on the ACMA's proposed changes to the Numbering Plan and other instruments as set out in the consultation paper of November 2024.

### **Draft Numbering Plan 2025 – Key Changes**

Aussie Broadband is supportive of proposed key changes including:

- a. Removal of redundant number types;
- b. Introduction of a discrete number type for mobile services, removal of 'digital' from the definition of mobile numbers and more flexible use of mobile numbers;
- c. Introduction of a new number type for Internet of Things (IoT) services;
- d. Introduction of new special services number type for public safety services;
- e. Updating the definition of local service to include 'portable locations';
- f. Cancellation of enhanced rights of use for numbers used for scam and fraud purposes; and
- g. Availability of geographic numbers.

### **Further comments on changes in the Draft Numbering Plan 2025**

Aussie Broadband agrees with the proposed removal of redundant definitions.

Regarding the ACMA's request for CSP comment on transitional arrangements; we propose a lead time of at least 12 months to introduce new number types. This allows CSPs a reasonable timeframe to ensure intercarrier arrangements, billing and IT systems are updated and ready to support the new number types.

### **Potential changes to be considered post remake of the Numbering Plan**

**Principles-based Numbering Plan:** Aussie Broadband is supportive of this approach, wherein the Numbering Plan outlines high-level principles while the detailed operational procedures are set out in industry codes.

**CSP registration:** We note that Minister Rowland announced on 21 January 2025 that a CSP Register will be introduced for the industry. Aussie Broadband views that an industry-wide register will facilitate greater visibility of CSPs for the ACMA and enhance their compliance monitoring activities.

**Number range for nomadic services:** Aussie Broadband's preference would be that the Numbering Plan be made to facilitate the wider use of mobile numbers, rather than introduce a new number range, noting the previous failure of the Location Independent Communication Services 0550 number range.

**Rights of use:** Aussie Broadband is in agreement that the changing nature of customers' connection to their numbers warrants a review of the current arrangements for rights of use of numbers. We envision a future where numbers can be used more flexibly allowing customers to access their required services between different CSPs, and numbers are not impacted by outdated restrictions that are not keeping pace with consumers' expectations of their number.

**Multiple use of numbers:** Aussie Broadband notes that the ACMA's preliminary position is to not prohibit the legitimate use of Multiple Service Practice (MSP); a position we are very supportive of. The consultation paper

recognises that the MSP is widely used in Australia and that prohibiting it would create issues across the economy for a range of businesses and government bodies, as well as stifle competition in the telco market. Noting Aussie Broadband's association to Symbio Holdings Limited (Symbio), to whom MSP is a key service offering, we strongly support the continuation of this practice and propose protections be put in place to ensure it remains a trusted and available service. We recognise that Symbio has been heavily involved in the consultation process thus far, and we support and reiterate their position as outlined in their engagement with the ACMA.

**Use of Mobile Numbers:** Aussie Broadband notes that the use and application of mobile numbers has changed over time. Our brands Symbio and NetSIP Pty Ltd utilise mobile numbers to offer enhanced services such as Communications Platform as a Service (CPaaS) and cloud-based services. Allowing flexibility within the Numbering Plan for use of mobile numbers without specifying the type of service will deliver higher levels of innovation, quicker time to market, diverse competitive offerings, and ultimately improved outcomes for the long-term interest of end-users.

Warm regards,

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