

Response to Proposed changes to the Numbering Plan and Other Instruments Nov 24

Symbio Holdings Limited (Symbio) welcomes the ACMA's proposal to change and update the Numbering Plan to be a forward-looking document that provides a basis for telecommunications services that customers are demanding. Please find our detailed comments provided in the following pages.

Portability Service Suppliers Determination

We agree with the remaking of the Portability Service Suppliers Determination

Provision of Pre-Selection Determination

We agree with the proposal to allow the Pre-Selection Determination to sunset on 1 April 2025

Draft Numbering Plan 2025 - Key Changes

Removal of redundant number types – we agree with the removal of premium rate, paging and calling card numbers. There should not be any significant cost burden in achieving this.

Discrete number type for mobile services – we agree that numbers for mobile services should be listed as a discrete number type and that the word "digital" should be removed.

Specification of mobile numbers – definition and use – see Mobile Numbers – specification and use section for further discussion.

Introduction of new number type for IoT – we agree with the introduction of a new number type for IoT and the separation of services between IoT - data only and IoT-service.

IoT data service - the provision of an IoT-data service with no requirements for E000 and IPND access should prove attractive for many applications. Regarding the proposed numbering, we agree with the use of 1900 number range for the IoT -data services. As with the introduction of any new number type, commercial arrangements will have to be established between interconnected carriers. Given that it is expected that there will be a long term and expanding demand for these services, the costs involved will likely be accepted as part of this service introduction but significant lead time would be required.

IoT –service (inc voice) - Symbio is new to the IoT area and hence has limited experience on the best way forward. One option would be to leave this type of service on the existing mobile number range where there is significant scope to expand numbers, even going to the 05 range if necessary.

Definition of local service – we agree to the change in definition to include “a portable location” in recognition of how VOIP services are currently used and will continue to be used. Although geographic location is lost for such services, the vast majority of geographic numbers will continue to be located in the SZU where they are allocated.

Cancellation of enhanced ROU for number used for scam and fraud – we agree with extension of the ACMA’s powers to allow the cancellation of an EROU number in the circumstances referred to.

Availability of geographic numbers – we have no issue with the ACMA adding numbers in the SZU’s/Charging Districts mentioned in order to manage the supply of numbers in an effective manner.

Number Portability – we note that the ACCC needs to be consulted on any changes to number portability. We do consider, however, that the Numbering Plan should just include high-level principles related to number portability with key operational requirements better included in industry Codes. This could be an area of future work.

Changes in the draft Numbering Plan 2025

Dictionary - Definition of mobile number -this refers straight to Section 18 of Chapter 3 – see discussion in section Mobile Numbers – specification and use.

Dictionary – Removal of redundant definitions – we agree with the removals proposed and suggest the ACMA also consider removal of the definition of “preselection verification service” as this will no longer be required when the Preselection Determination sunsets.

Chapter 3 - Addition of mobile numbers as a discrete type - we agree with the addition of mobile numbers as a discrete type. See Mobile Numbers – specification and use section for further discussion.

Part 4 - Provision relating to use of computer programs – the ACMA should explain in more detail the reasons for this additional section.

Transitional Arrangements – a significant transition time is required when introducing new number types (e.g. for IoT) to ensure inter-carrier arrangements are in place, billing systems updated and IT systems modified. Given that CSP’s need to plan well in advance and have existing programs in place, a lead time of 12-18 months is not unreasonable.

Potential changes to be considered post remake of the Plan

We note that there are a range of issues still to be addressed by the ACMA that are relevant to numbering issues and the efficient operation of the Numbering Plan. We stand ready to participate in these further reviews as they arise. We consider the most pressing of these is the **multiple use of numbers** and changes required to various instruments to support legitimate use of MSP by CSP's. This is addressed further in the MSP section.

Other matters raised in the paper are addressed below:

Principles-based Numbering Plan – as indicated in our initial submission, we are in favour of such an approach with detailed administrative and operational matters to be included in other documents that can be more readily changed, e.g. industry Codes. It is clear also that other related documents regulating the telco industry, e.g. Telco Act itself are in need of overhaul. This could be raised by the ACMA with the relevant authorities.

New Nomadic Number Range - we note and generally agree with the ACMA's comments on the difficulties in introducing a new nomadic number range including the previous failure of the 0550 range. It will be difficult to achieve consumer and business confidence in using such a range particularly when compared to using mobile numbers for services such as cloud-based services. It would be preferable if the Numbering Plan facilitated the wider use of mobile numbers as an immediate solution as recommended by Symbio in this submission. Significant time and resources would need to be committed to ensure all necessary commercial, technical and regulatory arrangements are completed and universal acceptance of this new range would be required.

Rights of Use – Symbio agrees that a review of the rights of use of numbers by end users is warranted given the way customers now wish to use numbers that are issued to them. This includes the MSP option outlined in section 8. There is a case for allowing numbers issued to end users to be used more flexibly so they can access the types of services they require – even from different CSP service providers. Numbers issued to end users should not have restrictions applied to them that, for example, restrict their use to a particular service provided by a particular CSP. It is recognised that this may impact on other regulatory instruments but such issues should be able to be resolved if there is willingness to do so. We should not be hamstrung by outdated concepts that prevent a forward looking Plan being implemented.

Multiple Use of Numbers – see details in below section on Multiple Service Practice (MSP).

Removal of Standard Zone Units – although the concept of SZU's is becoming outdated, it is agreed that substantial work effort and expense would be required to implement significant changes. There are also links to other legislation, including the requirement of untimed local calls (which in itself has become outdated). It is

interesting to note that the NAD Management Committee in New Zealand recently looked at this issue and there was little industry enthusiasm for pursuing this due to the complexities involved.

Multiple service practice (MSP) and scams

We note and agree with the ACMA's position that the draft Numbering Plan does not prohibit the long-standing use of Multiple service practice (MSP) based on evidence and feedback. In Symbio this process is well entrenched with customers and any disruption to this would have wide-reaching impacts. Symbio provided significant rationale for this approach in its initial response to the Numbering Plan review¹.

The approach to numbering and MSP should be underpinned by principles rather than regulation ensuring that the end customer should have confidence and knowledge in the number that is being presented in the call to them.

Symbio agrees that continuance of this practice facilitates innovation, with many of the cloud technologies utilising MSP to provide end users - particularly businesses - with access to new technologies at lower cost and greater scalability. It will need to be supported by additional rules and processes around scam reduction activities, with such activities better supported outside the Numbering Plan rather than within. Symbio, together with other CSP's, has already had discussions with the ACMA on such arrangements and is looking forward to commenting on the ACMA position paper targeted for release in Q1 2025.

We recognise the need to support strong restrictions and governance to ensure issues of privacy are satisfactorily managed in parallel with this. Accordingly, existing privacy principles are likely to require further consideration to allow industry to better manage scam traffic.

Symbio agrees that enhanced Know Your Customer (KYC) rules and a robust Know Your Traffic (KYT) framework would be part of the new arrangements. We also reiterate that all obligations and processes regarding introduction of MSP, including processes such as whitelisting and registries, need to be consistent across the industry.

We have provided some use cases below to demonstrate how businesses are using multi-services practice today and how this is supporting valuable service innovation.

Use case 1

A local builder has an existing phone number known to their customers. The builder now wants to digitise their process for managing jobs, quotes, note keeping and photos of work completed. They sign up to use a cloud-based customer relationship management (CRM) platform for voice and text

¹ Symbio submission to the ACMA Review of the Numbering Plan – July 8, 2024, pages 5-9.

communications. They provide their existing number to be used as a verified CLI on the platform (and undertake a verification process confirming they have rights of use over this number). Now, when the builder dials out from their mobile, through the CRM their mobile number is presented to the end user. This means their customers know who is calling and can return the call if they miss it.

Use case 2

A software company has a workforce that is comprised of individuals that work in the office, individual that work from home and salespeople that are fully mobile. They recognise they have issues with a significant proportion of customer conversations happening via non-work mobile channels (e.g. WhatsApp) and information is not being effectively secured, recorded and retained. They want a company wide UCaaS platform that allows all of these workers to collaborate via chat, voice or video. Salespeople would like to bring their existing work mobile number to be their primary UCaaS number presented to customers

In a survey of 210 Australian companies by Omdia in Sept 24, 82% of respondents answered yes to “Is your organization interested in a mobile UCaaS solution where the mobile phone number is the same as the UCaaS phone number?”

Use Case 3

A University is looking to run a fundraising campaign contacting a large pool of old alumni. They would like to use a third-party call centre to run this fundraising campaign as they offer sophisticated platform capability to generate calls to specific target lists and run detailed call scripts. The University authorises the temporary use of their existing number to be presented as the calling number as this creates certainty around who the call is from for recipient and allows them to call back to the University if they have any further questions.

Mobile Numbers – specification and use

Background

In our earlier submissions regarding the Numbering Plan, Symbio noted that the use and application of mobile numbers has changed over time with the development of CPaaS services and cloud-based services². We re-iterate this view and agree that restricting the use of mobile numbers to solely mobile networks would stifle innovation and the provision of services that customers are requesting, including cloud-based mobile numbers. Many such services are currently in use and any move to restrict the use of mobile numbers for such services would cause considerable disruption in the industry.

² Symbio submission to the ACMA Review of the Numbering Plan – July 8, 2024

The Numbering Plan should be a forward-looking document that promotes innovation, competition and choice for all types of end users and allowing some flexibility in use of mobile numbers achieves this.

We have previously pointed out that MNO's are currently using mobile numbers in a variety of ways, e.g. via the public mobile telecommunications network, via wi-fi access over the fixed network and via issuing of virtual mobile numbers to non-mobile operators. Recent announcements by some MNO's have now indicated that mobile numbers will be used to provide direct satellite services via LEO's, i.e. not using the PMTS. These developments reinforce the position that mobile numbers should continue to be available for the use of innovative services as technological changes provide new opportunities for enhanced customer services.

(commercial in confidence)

[REDACTED]

(commercial in confidence)

Some MNO's have claimed that a greater flexibility in use of mobile numbers will lead to reduced trust in mobile numbers. We would contend that due to the prevalence of scam across all telecommunications services, trust in numbers has unfortunately been reduced over recent years. This despite significant ongoing efforts by all telcos to reduce scam, including the use for AI techniques. We note in particular that the continuing use of "SIMboxes" on MNO networks is a contributing factor to this lack of trust.

Draft Plan Implementation

Regarding the implementation of this approach in the draft Plan, we agree with the definition of a mobile number in Section 18 which just defines a mobile number as a number that uses the digits set out in Schedule 4.

In Section 19, part (1)(b), we understand that this is a vehicle to allow more flexible use of a mobile number without being specific as to the type of service. We consider this a sensible approach that will allow mobile numbers that are provided after the Plan is in place to be used with a degree of flexibility.

We understand that Section 19, (2) is provided to cope with transitional arrangements in moving from the old Plan, e.g. if mobile numbers are currently being used for an IoT service they can continue to be used with this service but any new IoT numbers must

use the new IoT range. This also means that any mobile numbers issued to Symbio prior to the new Plan coming into effect could continue to be used with the service they currently provide and will prevent disruption to existing services.

A further issue to be considered as a result in the change to the use of mobile numbers is the need to review the definition of a portable service.

The current definition is as follows:

portable service means:

- (a) a local service; or
- (b) a freephone service; or
- (c) a local rate service; or
- (d) a public mobile telecommunications service other than a satellite telephone service.

As noted above, the use of “a public mobile telecommunications service” in part (d) is no longer appropriate and needs to be changed to provide increased flexibility to cover current and future use of mobile numbers. We suggest this be changed as follows to include the change in the definition of a “mobile number” as proposed in the draft Plan

portable service means:

- (a) a local service; or
- (b) a freephone service; or
- (c) a local rate service; or
- (d) a service using a mobile number

We consider that the mobile number portability system that is already in place is eminently suitable for the increased flexibility in the use of mobile numbers and no system developments would be required. All CSP’s that are allocated mobile numbers would just need to make arrangements to access the existing system. Note that already even those CSP’s not actively involve in porting mobile numbers can operate on the system in a listening mode so they can update their portability database.

In its press release in 1999 mandating mobile number portability, the ACCC was perhaps prescient in stating that “as far as possible, a long-term integrated approach to number portability which can cater for portability across different mobile technologies and between fixed and mobile networks is preferred to short term ad hoc solutions which can only provide portability within a single mobile technology”

Symbio has provided a number of comments on the draft Numbering Plan for consideration by the Authority. Symbio is available to discuss any questions that arise in connection to these with the ACMA team as required.

Confidential contact details:

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