Telecommunications Numbering Plan 2025

February 11th, 2025

Bandwidth plc

Preliminary remarks

1. Bandwidth Inc. provides services in Australia via its controlled entity Voxbone SA and it welcomes the opportunity to provide this submission to the consultation on the new draft National Numbering Plan published by ACMA. This submission touches on the issues that are most relevant to us.

2. Bandwidth's entity Voxbone has been operating in the Australian market as a Carriage Service Provider ('CSP') since 2006. Voxbone has since partnered with other local CSPs and has also been allocated numbers directly by the Australian Communications and Media Authority ('ACMA') to ensure direct and seamless provision and quality of service for   our   customers.

3. As a global operator serving both Wholesale and Enterprise customers in Australia, Bandwidth welcomes the opportunity to comment on ACMAs initiative to sunset the 2015 National Numbering Plan (NNP). For us and the customers we serve, it is important that the new modernised NNP reflects the technological advancements as well as ever changing demand factors taking place in the market place.

4. Our customers represent a wide range of use cases; from domestic enterprise customers requiring VoIP calling services, to cloud call centres and truly global enterprises that make the fullest innovative use of communications services to serve their Australian customers. For Bandwidth to serve them, and ultimately drive value for Australian consumers, a modern NNP that maximises innovation and investment is of utmost importance.

5. Having said that, given the importance of numbering resources to everything we do, we are of the opinion that changes to the NNP should be implemented cautiously so as not to introduce regulatory uncertainty. Too swift and unexpected changes into the market-place can damage innovation, investment and ultimately restrict competition and deteriorate value for the downstream end user. Any change should therefore be based on close consultation with all market players affected. This is especially true in situations where a previous entitlement of a numbering resource is being withdrawn or where previously permissible use cases of numbering resources are being restricted.

6. In submitting our response, we focus on two major topics of the draft NNP which can affect the adoption of innovative services and delivery of value to the Australian end users: Multiple service practice (MSP) and the proposed changes associated with VoIP.

MSP

7. We support ACMAs decision to permit the continued use of MSP. The practice of multiple carriage service providers using the same numbers (aka: "over-stamping") allows for numerous legitimate and welcome use cases that have, and continue to offer, real

consumer value. Specifically, the flexibility that MSP functionality offers has shown to be especially useful not just for global enterprise customers who need to serve domestic customers as well as for cloud contact centres 'reaching in' to the Australian domestic market, but also for Government institutions and Australian Businesses of any size that have embraced digitalization and innovation at the core of how they communicate with end users.

8. Regrettably and as is well known, the same flexibility offered by MSP has, on occasion, attracted fraudsters and scammers. Despite this unwanted traffic, we are of the opinion that anti-scam measures should remain technologically neutral and not single out MSP specifically, in order to remain effective and relevant in an ever changing market place. From this perspective, we are of the view that the Communications Alliance, through Industry Code C661:2022, has now established a rigid framework to combat scam and fraud holistically; regardless of technology used by the fraudsters and scammers.

9. Moreover, as is noted in the consultation, ACMA could consider STIR/SHAKEN as a means to enhance trust in the call chain (and ultimately for the recipient). Enhanced trust in the call and the ability to trace back calls beyond the assigned operator of the number (to the ultimate calling party), would, in our opinion, go some way to stamp out undesired calls yet permit desirable use cases to remain. Whatever remedies ACMA and the industry chooses to implement in order to combat scam calling, we urge ACMA to consider the global nature of the communications market, and indeed the global nature of fraud and scam calling, in order to arrive at a position where Australian citizens are provided protection yet still allow the Australian communications market to benefit from the vast array of innovative services offered by a large number of global enterprises and communications providers.

10. Bandwidth looks forward to working with industry players to establish an Australian communications market which drives consumer choice, creates value and enhances trust whilst at the same time remains fully open to global market players.

11. Finally, having welcomed ACMAs proposal to allow MSP functionality to remain, we urge ACMA to strengthen its wording in relation to mobile numbers used for MSP functionality in the draft NNP. As it currently stands, we feel that the original consultation document is clearer than the draft NNP as it regards the continued permissibility of mobile numbers in an MSP context. We also fear that whilst ACMA had generally stated the view that they wish to incentivise, support innovation, and the use of mobile numbers in a cloud environment, this wish does not appear reflected in the text of the new NNP which appears instead very restrictive. Specifically, at Division 3.19.2 of the draft NNP, it is unclear to Bandwidth whether a mobile number can be used for MSP *only* if the actual number itself was in use for MSP purposes *before* the issuance of the new NNP *and* that no change of use case for that mobile number. Given the fluid nature of MSP, it is unclear to us how this can be monitored and by whom. Furthermore, in a market where other operators provide transit services to other operators, transit service providers could unwittingly become involved in the conveyance of impermissible mobile MSP traffic. We therefore welcome clarification which acknowledges the large number of entirely permissible and valuable use cases of MSP.

Updating the definition of local service and VoiP services

12. We welcome ACMAs updated definition of Carriage Service which recognizes that 'local services', in an IP environment, are no longer functionally limited to a 'fixed location' but are increasingly used at a 'portable location' using modern end user methods to connect. The updated definition of 'local service' therefore reflects the increased end user substitution from PSTN to IP and will now allow the end users to choose, or continue to use, a geographic number for their IP based voice communications needs.

13. Furthermore, ACMAs intention to explore the potential additional introduction of a geographically unspecified or nomadic number range to accommodate VoIP, application-based messaging and cloud-based services as part of a post remake numbering work program, is also noted and welcomed as an addition to geographic numbers for VoIP services as it has the potential to further enhance innovation, end user benefits and drive healthy competition amongst competing operators.

We are available for any questions or further discussions in relation to the above.