Review of the Draft Numbering Plan 2025

TPG Telecom submissions

Australian Communications and Media Authority

February 12, 2025

[~~Confidential~~]

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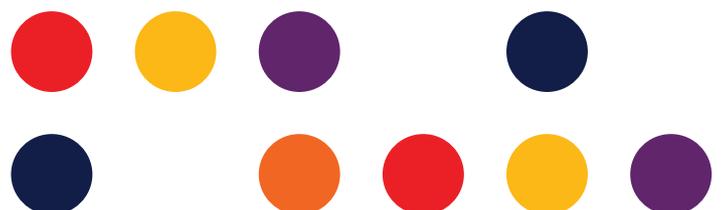
Submission

Thank you for the opportunity to make comment and provide feedback on the draft Numbering Plan 2024 (the Plan).

About TPG Telecom

TPG Telecom is Australia's third-largest telecommunications provider and home to some of Australia's most-loved brands including Vodafone, TPG, iiNet, AAPT, Internode, Lebara and felix.

We own and operate nationwide mobile and fixed networks that are connecting Australia for the better.

Executive summary

TPG Telecom supports the remaking of the Telecommunications (Sections of the Telecommunications Industry – Portability Service Suppliers) Determination 2025

TPG Telecom Supports the sunsetting of the Telecommunications (Provision of Pre-Selection) Determination 2015.

TPG Telecom supports the making of the *Draft Telecommunications Numbering Plan 2025* (draft Numbering Plan). We support:

- Removal of redundant number types
- Introduction of mobile numbers as a discrete range from special service numbers
- Introduction of new special service number type for Internet of Things (**IoT**) services for use solely on its home network and a number range for communications across networks; and
- The provision to cancel enhanced rights of use for Smartnumbers if the number is used for scam activity (noting as an inbound number it can only be used as a gateway to a scammer as these numbers are blocked for outbound calls as per C661).

TPG Telecom does however believe there is scope for the revised Numbering Plan (**Plan**) to take a bolder and more wholistic view of numbering, creating a model that will account for the longer-term uses for the numbering system. Under the draft Plan:

- Local numbers are no longer geographically assigned and can be located anywhere. This makes their use for providing services based on location (e.g. local restaurants, banks, etc.) difficult (if not impossible). This will also likely affect the operations of the Triple Zero service where calls may take longer to process as the number location (state and locality) cannot be assumed from the number type and configuration.
- Mobile numbers will become a de facto fall-back number range for a variety of uses. The changes would endorse using mobile numbers on any kind of network, but they may not have the same service capability when used on a non-mobile network (e.g. the ability to send a message to a mobile number while providing the sender with confirmation the message was received) and an emergency call will not have the same location information capability.
- The new number ranges and definitions for internet protocol-type services are confusing. Changes identified as future capability, such as a fixed number range for non-geographically restricted services are now effectively put into effect using local service numbers through the removal of the location requirement.

- ██ The Plan could be usefully employed as an additional tool in the fight against scammers.

The Plan should be a cohesive part of an overall strategy and regulatory approach that fosters trust in telecommunications and minimises opportunity for scam and fraud traffic. The plan should enable competition but not at the cost of compromising the security of the nation and the utility of communications services through misuse of numbers.

The identified issues with the plan limit the extent to which it can form part of a cohesive regulatory framework. This necessarily limits our ability to maintain a safe and secure telecommunications environment for our customers and the broader community in Australia.

As we stated in our previous submission and reiterate here, TPG Telecom encourages the ACMA to make further change to the Plan as follows:

- Clarify number use in a more consistent manner for all number types by changing the layout, format and content for supplying information about number use (we have previously provided details and examples of this). The Plan should set out principles for number use and numbering approach for all individual number types and how numbers can be used for call origination and termination across networks.
- Specify the restriction on use of Australian numbers for origination of traffic from outside Australia (stopping numbers originating from other than the home network would assist this).
- Require number types to be used consistent with the associated technology type (e.g. a prohibition on the use of mobile numbers originating from non-mobile networks consistent with s32 of the Telecommunications Act).
- Immediately introduce the proposed new number range for a mobile equivalent service on fixed networks so there is no scope for misuse of mobile numbers.
- Make geographic location exemption an exception rather than allowing local services using a geographic number to be used anywhere; and
- Consider the important role of the Plan in fighting scams and the need to tighten control of number use by explicitly stating that numbers can only be used to originate traffic on the home network used by the CSP for that number (whether allocated or ported) and forbid origination from other than the home network of that number. This currently causes an associated issue with the operation of the Integrated Public Number Database (**IPND**) where use of a number on multiple networks adds additional time and cost to the operations of law enforcement and national security agencies (including solving and prevent crime and life-saving investigations such as suicide prevention) by necessitating searches for communications originating across multiple networks.

TPG Telecom believes that these changes would address current deficiencies in the Plan to better meet the expectations of consumers, as well as emergency services, investigation agencies and enforcement agencies in Australia.

TPG Telcom has further specific detailed comment on some of the changes made in the revised Plan below.

Detail on areas of particular concern

Multiple Service Provider (MSP)

Number poaching, also referred to as Multiple Service Provider (**MSP**) is inconsistent with controlling scam traffic as evidenced by recent growth in scam traffic being sent through mobile networks.

It is evident from submissions and consequent changes made to the draft Plan that the ACMA has focused predominantly on the pro-competitive issues of number use rather than the broader implications of number use across the telecommunications eco-system. The Plan has a role as a tool to assist in public safety, the fight against scams and fraud, and in the investigation and avoidance of criminal activity and saving lives.

As raised in our previous submission, in a pro-competitive service environment many traditional tools to stop scam activity are thwarted without adequate regulatory certainty provided by the Plan. An open door for pro-competitive services is an open door for scam activity ███ through simple numbers-based rules (e.g. blocking numbers originating from networks other than their home network).

The ACMA is relying upon 'Rights of Use' (ROU), 'Know Your Customer' (KYC) and 'Know Your Traffic' (KYT) processes to address the scam aspects that arise by allowing numbers to be used across multiple networks. TPG Telecom does not believe this will be effective.

The approach seems to be based on a belief that a customer has a 'right' to use a number across multiple networks. The Industry Code *C566-2023 Number Management – Use of Numbers by Customers* provides a customer 'ROU' of a number on the home network of the CSP supplying that service. There is <u>no</u> 'ROU' right given under C566 to use of a number across multiple networks, especially across multiple networks at the same point in time.

Further, the provision of a carriage service to an end-user requires a CSP to meet obligations to supply information to Telstra Limited as it reasonably requires in connection with fulfilment of its IPND obligations.
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Even if a CSP does a 'ROU/KYC' type check (e.g. something similar to authentication for a port such as a one-time password sent to the number) the check will be at a single point in time. Even with multiple checks based on elapsed time or volumetrics of communication, each check is only effective at that point in time.

As number use is dynamic and subject to the frequency of a 'ROU/KYC' check obligation in any future scam framework, a number may be ported away from its home CSP, the service transferred to a new customer, or a service may be suspended or disconnected at any time after the last 'ROU/KYC' check took place. This would enable communications to continue to other networks until the next 'ROU/KYC' check was required██

The reality is only the CSP that supplies the service to the customer can correctly identify the status of a number (i.e. active, suspended or disconnected) and the 'ROU holder' of that number. While another CSP may check that a person has access to a number, this

possession does not mean that they are the entity that is the 'customer', nor can they ascertain if the service is in a status that does not permit outbound communications.

TPG Telecom scam control monitoring sees numbers being used across multiple networks, and frequently moving between networks.

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A more effective approach is to block all communications from a number that is not coming from the home network for that number (i.e. a TPG Telecom number should only ever come from the TPG Telecom network).

In an environment where numbers are allowed to be (mis)used across multiple networks scam traffic will continue to proliferate. Simple network rules-based tools cannot be deployed and the current practices of relying on controls by the traffic originator who are often overseas and beyond the reach of the ACMA will mean that the game of 'whack-a-mole' will continue.

MSP also brings into question arrangements for number charges, including costs for allocation and any applicable Annual Numbering Charge (**ANC**).

The IPND obligation in the *Telecommunications Act* that requires a CSP that provides a carriage service to provide information to the IPND is not being effectively enforced as CSP that do not hold the number yet are supplying carriage service on that number do not provide information to the IPND. This must be addressed and making changes to IPND in support of number of an MSP model will drive up costs for the CSP that holds the number and for industry more generally.

In the ACMA MSP model there is no ability to keep track of the use of a number to a particular network. This model prevents the use of scam protection tools that could otherwise be used to stop scam traffic such as simple network controls that could ensure that a number only originated from the 'home' network of that number which would eliminate number spoofing.

Law enforcement and national security impacts related to MSP

While scam communication is a high-profile issue presently, the changes to the Plan and the flow-on impacts create more serious issues relating to national security, local law enforcement and emergency services:

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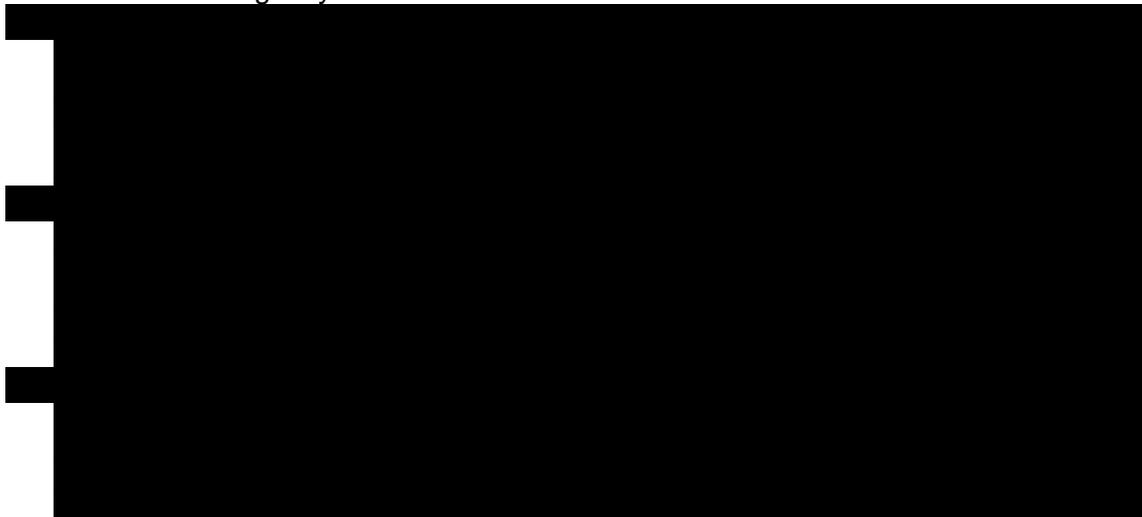
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- The change to 'local service' will result in the address of all services using a geographic/local number being potentially useless.
- 13/1300/1800 products that rely on knowing the caller location will not work as accurately as it is based on MOLI, CLI & Post code routing associated with IPND data.

TPG Telecom queries whether law enforcement and investigation agencies are aware of the implications of the MSP model, ██ ██ ████████████████████████ There will be an increase in costs and resources to track communications that could be occurring anywhere as a result.

MSP Conclusion

There is no excuse for a CSP using numbers not held by that CSP. Number portability has been in place for over two decades to enable consumers to move to a different supplier to take advantage of a service that better meets the customer's needs (e.g. a cheaper service, improved coverage, better customer service, more features, etc.)

The MSP model proposed by ACMA effectively devalues number portability and annual numbering charges. There is limited incentive to port a number when MSP enables the use of another number, especially considering the ANC is borne by the holding carrier.

If MSP is to be formally permitted there will need to be a fundamental review of charges relating to numbering including the cost of ordering numbers and any ongoing ANC.

An environment where number poaching is tacitly endorsed also creates an environment where number spoofing is difficult to control. Any competitive concerns must be balanced against the fact tighter control of the numbering system will provide a powerful tool in the fight against spam and scam traffic.

Alternatively, as IPND does not cater for the MSP model proposed by ACMA, the practice should be banned immediately.

TPG Telecom believes reverting to a traditional view of the 1:1:1 relationship of a customer to CSP and to the network used for communications to and from that number ensures the ongoing arrangements for IPND, emergency calls, enforcement and investigation agencies remain unaffected. Effective number-based rules can be entered across all networks so that more effective scam controls can be put into place.

Mobile numbers

TPG Telecom endorses the approach of renaming 'digital mobile services' to the simpler 'mobile service' and making s.19 a discrete section that better identifies rules relating to this number type. However, we do not agree or endorse all the changes made to the Plan in s.19.

The Australian telecommunications landscape largely operates on trust. The current Plan clearly identifies that mobile numbers are used with Digital Mobile Services. The *Telecommunications Act* is explicit in identifying what a mobile service is (refer s.32). The public expects telecommunications carriers and carriage service providers will operate within the boundaries of regulation, and that the calls they receive can be trusted. We have seen serious erosion in that trust as so-called 'competitive services' use numbers in ways that are inconsistent with regulation and/or subvert the use of tools that would be more effective in stopping scam traffic.

Many of the so-called innovative services use mobile numbers because they have caused the erosion of trust[1] in geographic numbers, such as for surveys, telemarketing, debt recovery, appointments, etc. Mobile numbers are preferred, but many of these services are provided from non-mobile networks.

It is highly questionable whether the service offered by such service providers could not be provided through use of traditional numbers held by that CSP, especially where an alternate number range has been put forward as a solution to the misuse of mobile numbers.

For example:
- Sales and telemarketing calls do not need to use mobile numbers. Usage of these numbers has unintended consequences for consumers who are often unable to respond using SMS/MMS.
- Debt collection does not need to use mobile numbers. Mobile numbers are preferred by debt collectors as consumers mistrust geographic numbers and are more likely to respond to a call from a mobile number,
- Call centre return calls do not need to use mobile numbers. Typically, customers call a 13/18 number and have a long hold time and are given the option of a return call. Again, mobile numbers are often used for these return calls as the 13/18 number cannot be used for outbound calls and mobile numbers are more trusted than geographic numbers.

Mobile numbers are being used to originate communications from non-mobile networks both within and outside Australia. They are effectively being used as a substitute for freephone and local rate services to mask the source location of the communication. Finally, limiting use of mobile numbers to mobile services ensures consumers can message mobile numbers with a high degree of confidence that message will be delivered. At present, non-mobile networks using mobile numbers are often unable to accept messages.

There are other call cases and together the unintended consequence for consumers is an abuse of trust. Ever more examples of the misuse of mobile numbers gives rise to increasing distrust in mobile numbers.

The changes made to the draft Plan by the ACMA effectively mean there are no longer controls for use of many number types. The ACMA has effectively enabled any number to be

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[1] https://telconews.com.au/story/aussies-lose-trust-in-traditional-comms-due-to-scam-surge-study-reveals

used for any purpose. In particular s.19(1)(b) in the draft Plan further opens up misuse of mobile numbers.

TPG Telecom's view is that s.19(1)(b) and 19(2) of the draft Plan that would effectively allow misuse of mobile numbers should be deleted and the proposed alternate number range for nomadic services on 'fixed' networks should be included in the Plan. That change would give these services a suitable number range and the Plan should specify an expectation that mobile numbers being used other than on a mobile network should be migrated to the alternate number range withing twelve months.

Further, the rules relating to incoming international access in s. 19(3) and 19(4) of the draft Plan are difficult to understand as the associated schedule references incoming international access in column 3. Column 4 referred to in these clauses relates to the cost and whether it is a low charge number, not incoming international access (see Schedule 4 below for reference).

Given that the reference to incoming international access is in column 3 this makes s.19(3) redundant and it should be removed and s.19(4) should be renumbered to s.19(3) and change the reference from column 4 to column 3.

Ideally the type of service column should be included in the table in Schedule 4 and identify that the number can only be used with a mobile service.

Schedule 4

1 Mobile numbers

The following table sets out the form of mobile numbers and provides information on the way in which the numbers can be used.

Mobile numbers				
Item	Column 1 First digits	Column 2 Number of digits	Column 3 Is incoming international access available?	Column 4 Low charge number?
1	04	10	Yes	No
2	05	10	Yes	No

Calls using Australian numbers that originate outside Australia.

There is no formal gateway to Australian communications for foreign traffic. There are few traditional international gateways, much of the traffic comes via transit providers. It is largely IP-based transit providers who allow communication into Australia with little care of the source or content of the communication. They may have no ability to distinguish Australian originated vs. overseas originated traffic. As noted by the ACMA there is an equivalence issue that has not been considered.

The required solution for genuine call traffic is that the overseas operator brings traffic into Australia via the CSP that holds the number and its associated carrier network. This approach presupposes that numbers can only originate from their home network within Australia, and given the current ability to number poach, is unlikely to be effective. If traffic continues to arrive via any number of other networks, there are effectively no controls that can validate that traffic.

Some Australian telcos have suggested STIR/SHAKENED as a solution, however Communications Alliance has already investigated and dismissed that approach. The technology is not widespread and has cost US operators' significant sums of money and has a poorer result than that achieved in Australia.

STIR/SHAKEN is fundamentally flawed as an approach to scam and spam control given several weaknesses:[2]
- It is expensive, and particularly unaffordable for poorer nations that will need to participate if the solution is to be effective.
- The prospect of subjecting all international calls – including those from nations unaligned to the USA - to a governance regime dominated by the USA, is unrealistic.
- It remains the case the best way to combat scam and spam traffic is to block the harmful call. STIR/SHAKEN does not achieve this.

There are obstacles to improved scam control caused by competing legislation – scam controls on one hand and competition law on the other.
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██████████████████████████████████ If 'competition' is used as a tool against effective network controls, it limits fraud managers ability to prevent fraud and stop criminal behaviour they have identified.

If Australia wants a more robust way to control scams, the Plan needs to facilitate telecommunications providers taking action against scammers. At present, it appears that some small service providers are being given preference over effective scam controls. Enabling MSP will limit effective network gateway controls, allowing ongoing misuse of mobile and other numbers and continue to limit control of scam traffic.

TPG Telecom has the following comments on specific sections of the draft Plan.

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[2] For more information, please see: https://commsrisk.com/global-stir-shaken-is-dead-what-comes-next/

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

Chapter 1– Dictionary

Change	Description	TPG Telecom Comment
Definitions of IoT and related services	Definitions for IoT and related number types have been introduced to the Numbering Plan to support introduction of number types for these services. Comment is invited on whether the proposed definitions accurately reflect the services.	The purpose and use seem to be inconsistent with previous ACMA position and the ACMA discussion paper. The three definitions create confusion about the intent of their use and the separate need for a number type for a mobile-type service on voice networks. The definition is not clear enough to identify what type of service is being provided. Typically, an IoT type device does not use voice and is a non-handset device allowing machine-to-machine, person-to-machine or machine-to-person communications. In the ACMA discussion paper it comments: *The ACMA intends to further explore consideration of the potential introduction of a geographically unspecified or nomadic number range to accommodate VoIP.* By not specifying the intent is for use by a non-personal handset device, the definition for Internet of things does not specify what type of service is allowed to use the 0900000000 to 0929999999 range. The use is not clear with the proposed definitions and as defined presently it could effectively be used as a mobile number alternative. TPG Telecom understood that the intent was for three unique number ranges: - two for data-only purposes, one of which would be for on-net use and the second allowing communications across networks.

Change	Description	TPG Telecom Comment
		- The third range would be for services that used both voice, data and possibly messaging where the was no fixed location and the communication originated on other than a mobile network.

Services requiring a voice component are only required where a human would be involved in the communication. These services can be served via use of either a mobile number where originating on a mobile network or using the non-location specific number range proposed for use on 'fixed' networks.

To achieve what we understood to be the intent, as supported by TPG Telecom, to have three categories of numbers (i.e. two number ranges for IoT data only services and a third number range for mobile equivalent services on 'fixed' networks) we suggest the following changes:

internet of things data-only service means a carriage service that:

    (a) is used for consumer and enterprise connected internet of things devices and applications; and

    (b) only requires access to data (internet protocol and non-internet protocol) services.

    Note: An IoT service is expected to be used for communications involving machines either as a machine to machine, person to machine or machine to person service and telemetry type services.

internet of things data only number means a special services number specified in Schedule 5 for use with an internet of things data-only service.

(Note: The number specification in Schedule 5 should show the differentiation between numbers used for on-net and inter-carrier capable purposes). |

Change	Description	TPG Telecom Comment
		The definition of internet of things service should be removed as it is unnecessary.

Lead time will be required to make technical, network, number management systems and other technical support services to be put into place to support any new number range, and for those numbers that are used for services that traverse networks additional time is required to allow for inter-connect arrangements to be put into place.

TPG Telecom does not believe number portability is required for this type of number and Annual Numbering Charges should not apply on the basis that they are low-cost services and have no IPND obligation and therefore almost zero regulatory and management cost.

We suggest an 18 month to two-year implementation period would be required to implement the proposed number ranges.

Notwithstanding the introduction of specific numbers for IoT services this should not preclude the ongoing use of mobile numbers being used for IoT services (and other services) on mobile networks.

There is a need to consider IPND obligations and whether IPND requires these numbers. TPG Telecom believes that adding IoT service numbers to IPND would add considerably to the data retained for no real purpose. |
| Definition of local service | The definition of local service has been amended to reflect number usage with portable services. | A service that can be anywhere can no longer claimed to be local. The changes to local service definition effectively means a geographic number can be anywhere. The definition has no limitations on the technology used to provide the service or the location of the service.

The change to allow a local service to have 'a portable location' has effectively enabled mobile-type services on a non-mobile network to use geographic numbers. This undoes the arrangement whereby the local service area is |

Change	Description	TPG Telecom Comment
	Comment is invited on whether the proposed definition accurately reflects the service.	used to provide location-based support services for 13/1800 numbers, such as nearest pizza shop. It will also likely impact the operations of the ECP and ESOs' through removal of location (SZU) requirements. The updated definition of local service to allow no specific location simply causes confusion between those services that are SZU and location dependent, and those that are not. This will make delivery of services that require location (e.g. emergency services, food delivery, Lifeline calls, etc.) more complex. A potential problem may also be created with the use of IPND location data used for Emergency Alerts and this will need consideration. The approach taken by ACMA means a position of accepting that a geographic number range is located at a particular address will no longer be true. TPG Telecom would prefer not to make this change to Local Service at this time but rather wait until there has been further discussion on the use of SZU's. We would like to see immediate introduction of a mobile number alternative range for use on 'fixed' networks that is not subject to the Annual Numbering Charge and leaving 'local services' with a geographic location to remain associated to a fixed location. This approach would also have the benefit of encouraging industry to start work on the practical implementation arrangements needed for this new number type to encourage take-up of the new number range to stop the current misuse of mobile numbers.
Definition of mobile number	Definition of mobile number has been amended to remove 'digital' and to reflect status as a stand-alone number type.	TPG Telecom supports the change of definition to remove 'digital' however we do not agree with the change that would allow use of mobile numbers on non-mobile networks which we believe is inconsistent with s32 of the Telecommunications Act and the expectation that a mobile number be used in association with a mobile network.

Change	Description	TPG Telecom Comment
	Comment is invited on whether the proposed definitions accurately reflect the services.	
Definitions of public safety number and public safety service	Definitions for public safety number and public safety service have been added to support introduction of numbers for these services. Comment is invited on whether the proposed definitions accurately reflect the services.	While TPGT Telecom agrees the need for this category of numbers the definition and numbers in the schedule do not reflect current use of the 0444 444 444 number used for emergency alerts. The definitional reference to s19 of the Telecommunications Act seems to be limiting of the use of this number range. Schedule 5 shows new number ranges to be used but fails to capture the one current public safety number (i.e. 0444 444 444) TPG suggests the definition omit reference to s19 and should be: *public safety service* means a carriage service that is used by a recognised Australian government approved entity that operates a service used for the primary purpose of providing public safety.
Removal of redundant definitions	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. Comment is invited on whether any definitions proposed for removal should be retained. If yes, please specify why.	TPG Telecom agrees that the Numbering Plan should not retain the definitions related to redundant number types proposed for removal and supports the removal of premium rate numbers, calling card numbers and paging numbers.

Chapter 3 – Specification of telephone numbers

Change	Description	TPG Telecom Comment
Add mobile number as a discrete number type	Mobile numbers have been added as a separate number type to reflect their dominant use in communications. A new schedule (Schedule 4) has been added with number details. Comment is invited on whether these provisions should be included in the new Numbering Plan. Are there any specific cost burdens in relation to this proposal? If yes, please specify.	Consistent with its earlier submissions, TPG Telecom supports the addition of mobile numbers as a separate number type in the Plan. Furthermore, the Plan should specifically prohibit use of mobile numbers on non-mobile networks and make available an alternative number range for nomadic services that originate on non-mobile networks as soon as possible. There are no cost burdens arising from this change.
Add numbers related to IoT services as a subset of Special services numbers	IoT numbers have been added to reflect their growing usage and to reduce the need to use 04 numbers. Details of the numbers have been added to Schedule 5. Comment is invited on whether there are any reasons not to introduce these number	TPG Telecom agrees with the addition of IoT numbers as a subset of Special Service numbers for use for IoT services. (See previous comment re. definitions and ongoing use of mobile numbers for IoT services on mobile networks)

Change	Description	TPG Telecom Comment
	types and corresponding ranges for IoT services. Do you support this initiative? Is the quantity of numbers proposed to be included in the ranges appropriate for the proposed use? Are there any specific cost burdens in relation to this proposal? If yes, please specify.	An initial view is the volume of numbers will be inadequate in the longer term, however there was insufficient time to fully assess whether the quantum of available numbers will be sufficient, and this will require careful monitoring. There may be benefit to using an alternate number range so as not to cause confusion with geographic numbers. Lead time will be required to make technical, network, number management systems and other technical support services to be put into place to support any new number range. For those numbers that are used for services that traverse networks additional time is required to allow for inter-connect arrangements to be put into place.
Add public safety numbers as a subset of special services numbers	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.	TPG Telecom supports identification of public safety numbers in the Plan. We are not aware of any cost burdens over and above the normal costs of deploying newly allocated numbers (e.g. setting up interconnect arrangements and network conditioning) and suggest that such numbers and any number block in which they reside that is not used for commercial purposes should be exempt from the Annual Numbering Charge.

Change	Description	TPG Telecom Comment
	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.	
Removal of redundant number types	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.	TPG Telecom supports the removal of premium rate numbers, calling card numbers and paging numbers. TPG Telecom notes that there are no specific cost burdens over and above day to day business as usual type activity to manage numbering.

Chapter 7 – Special rules about smartnumbers

Change	Description	TPG Telecom Comment
Addition of provisions for cancellation of EROU where the numbers are used for scams	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 <mark>make</mark> scam calls. An associated review of decisions	TPG Telecom notes that these services should never make scam calls as this is specifically disallowed under the Industry Code C661 Reducing Scam calls and Scam SMs and any calls that did originate would

Change	Description	TPG Telecom Comment
	provision has also been added in section 119. Comment is invited on whether these provisions should be included in the new Numbering Plan. If not, why not? In deciding whether to cancel EROU where a Smartnumber has been used for scam calls, what should the ACMA consider? Is 5 business days sufficient time for an EROU to respond to a notification of any proposed cancellation? Are there any specific cost burdens in relation to this proposal? If yes, please specify	in the normal course of carrier anti-scam activity be blocked. We suggest that 'make scam calls' be replaced with 'used in association with scam calls' so that where the number was used as a call back number the EROU would be removed. Also, the removal of EROU is an administration function and where the number is proven to be used in association with scam calls should come into immediate effect. There are no specific cost burdens over and above day to day business as usual type activity to manage numbering.

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

Change	Description	TPG Telecom Comment
Addition of provision relating to use of computer programs	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.	TPG Telecom has no objection to this inclusion if necessary for the good governance of the Plan.

Change	Description	TPG Telecom 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	TPG Telecom 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.	TPG Telecom has long encouraged a move to a principle-based Numbering Plan where detailed operational procedures and requirements would be set out in industry codes and guidelines. We have previously provided a copy of what the Plan should look like and have attached this with this submission.
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.	TPG Telecom recognises the need for a Register of CSPs or licensing scheme and remains a supporter of such a register. We note the government has now announced such a scheme. Given that there are in effect several 'registers' already in existence it would make sense to rationalise these and have a single master register that could be used for multiple purposes e.g. TIO registration, Register and ID codes for number portability and other industry operations, IPND register, etc.
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	TPG Telecom has seen misuse of numbers ever since ACMA stopped vetting applications for numbers. We support a return to ACMA requiring additional

Issue	Description	TPG Telecom Comment
	(for example) intended use of numbers they are applying for and whether they are able to support relevant requirements such as portability.	information before numbers are made available for allocation, including intended use and justification for the quantity of numbers to avoid number hoarding.
Number range for nomadic services	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. 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. 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	See comment re. Local Service. Effectively ACMA changes to the definition of local service allow geographic numbers to be used in the same way as this new number range was proposed to support. TPG Telecom supports immediate introduction of a number range for nomadic services to provide an alternative to mobile numbers being used on non-mobile networks. Non-mobile network operators should be required to take steps to migrate services that are using mobile numbers to this number range within twelve months. TPG Telecom supports an approach of ANC relief for a period of time to encourage migration to this number type. While there would be operational costs to establish this number type and number portability arrangements the cost would not be significant, particularly if using the MNP model for number portability. • To speed up implementation TPG Telecom believes that Interconnect should be based on current geo number arrangements and

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	regard to concepts such as technical neutrality.	portability could be enabled via a modified MNP process. • There would need to be a public education campaign to alert consumers of this new number range and its purpose. • The numbers should be in blocks of 10,000, as with mobile numbers. TPG Telcom recommends a twelve-month implementation timeframe.
Rights of use	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 program may consider whether strengthening or enhancing a customer's right of use to a number and CSPs obligations is warranted.	TPG Telecom is unclear what problem the ACMA is looking to solve with such a review and would welcome more information from ACMA to understand whether change is required. Noting that C566 Use of Numbers Code was recently reviewed and revised to provide additional clarity about ROU and all matters raised as part of that Code review were addressed at the time other than the issue of using numbers across multiple networks an issue that has strongly divergent views. TPG Telecom does not support any change to ROU that would give a right to use numbers across multiple networks.
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	TPG Telecom does not support the Multiple Service Provider (MSP) approach which in looking to satisfy requests from small CSPs, will open the door for scammers.

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	legitimate use of MSP by CSPs. See section 2.3 below.	ACMA has limited the deployment of the strongest tool a carrier has – the effective blocking of mis-used numbering.

Curiously, this approach not only allows ongoing misuse of numbers but endorses it. Research on the effectiveness of tools to stop scams mention that the Australian environment without a STIR/SHAKEN regime has been far more effective in stopping scams than the US which has this approach.

The Scam Code and action of major telco's has proven to be a more effective tool against scams.

Despite this, the very tools that have given Australia a good reputation for effective scam controls will be diluted by the MSP approach that openly allows use of numbers across multiple networks.

An MSP environment cannot exist unchecked. The approach adopted by the ACMA is likely to drive up costs for all CSPs and carriers due to the need for additional checks and balances. The ACMA must consider breaches of the IPND obligation in the Telecommunications Act. |
| Removal of standard zone units (SZUs) | While SZUs are still required for some services and several existing | The use of SZUs needs further consideration and it would be premature to |

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	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.	remove them at this time. For services that are IP based with no effective location a better approach is to enable use of the proposed new number range. Location information is still relied upon to provide emergency services and to support location-based routing for 13/18 services.
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.	As per our previous submission, TPG Telecom supports including a new range for short codes in the Plan for a range of community purposes. We had previously suggested two 4-digit ranges commencing with 3 and 7. There is no reason not to introduce this change to the proposed 2025 Plan.

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