



TELSTRA GROUP LIMITED

Proposed changes to the Telecommunications numbering charge instruments

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01 Introduction

Telstra welcomes the opportunity to respond to the Australian Communications and Media Authority's (ACMA) consultation paper and proposed changes as part of its review of the:

- Telecommunications (Annual Charge) Determination 2014 (the Annual Charge Determination);
- Telecommunications (Collection of Numbering Charges) Determination 2014 (the Collection of Numbering Charges Determination);
- Telecommunications (Numbering Charges) (Allocation Charge) Determination 2015 (the Allocation Charge Determination); and
- Telecommunications (Charges) Determination 2022 (the Charges Determination 2022).

At Telstra, we are committed to delivering high-quality services to our customers. We continually strive to improve these services and drive innovation in our offerings. Telephone numbers play an essential role in delivering many of these services. So it is important that the associated regulations and related costs of acquiring and using numbers are efficient and fit for purpose.

02 Proposed changes to the Telecommunications numbering charge instruments

Telstra supports the proposed changes in the draft Annual Charge Determination and in the three other instruments addressed in the ACMA consultation.

Telstra especially supports the inclusion of Internet of Thing (IoT) service numbers as a low-charge number type for the purpose of the annual numbering charge (ANC), that would have the effect of these numbers being charged 1% of the full ANC charge.

IoT services generally generate low revenue as they are used for devices like smart meters, security systems and medical sensors. It is expected that the reduced charge will support the take-up of IoT numbers to help drive Australia's connected digital future.

Telstra also supports the proposed exemption from the ANC for public safety service numbers used by Telstra in its role as the Emergency Call Person, reflecting their public interest use.

03 Future considerations

3.1. ANC exemptions and Geographic Numbers

The consultation paper suggests considering the extension of the ANC to geographic numbers in the future. Telstra does not support removing the exemption for geographic numbers.

It is unlikely that extending the ANC to geographic numbers by removing the current exemption would promote the efficient use of numbering resources associated with historical geographic number allocations. Historically allocated, but unissued geographic numbers held by CSPs are unlikely able to be returned, as contiguous blocks of one hundred or one thousand numbers may not exist, preventing their return. In such cases, CSPs would be unfairly charged for numbers they are not able to return, due to historical arrangements spanning several decades.

If the ACMA is concerned about growth in the use of geographic numbers and the potential for number scarcity, especially given the decline in landline usage, we suggest the ACMA review the use of



numbers acquired by CSPs that are driving this growth and consider whether more targeted measures could be adopted.

We are also concerned this change would result in significant additional costs to develop and maintain ongoing processes and reporting to determine which geographical numbers CSPs hold for the purpose of calculating the ANC, similar to the existing mobile number process.

This would include creating an industry process to reconcile ported geographic numbers and determine the holding CSP on the census date, as well as managing any resulting disputes. Further, similar to the mobile number ANC process, a process will be required to ensure that downstream CSPs holding numbers transferred to them outside of the ACMA number system are correctly identified and contribute their share of the ANC.

Such processes would be administratively onerous for the industry, especially given the smaller batch sizes permitted for geographic numbers compared to mobile numbers. Geographic number batches can be up to 100 times smaller than those for mobile numbers, so the administrative cost involved could be many times greater than that for mobile numbers.