

## **Symbio's response to Proposed Changes to Numbering Charges Determinations - Consultation Paper December 2024**

Symbio Holdings Ltd (Symbio) appreciates the opportunity to comment on the Australian Communications and Media Authority consultation on the proposed changes to the Numbering Charges Determinations.

Symbio operates one of the largest IP Voice networks in Australia and is interconnected with all major mobile and fixed networks. Symbio provides innovative communications platform solutions to enterprise and wholesale customers and global communication service providers in Australia, New Zealand and multiple Asia-Pacific regions.

### **1. Telecommunications (Annual Charge) Determination 2014 (ANC Charges)**

Symbio agrees with the proposed changes to the Determination including:

- updated definitions to include IoT services and public safety service
- inclusion of IoT numbers as a low service charge
- public safety numbers to be exempt from charge
- IoT numbers to be exempt from charge for 12 months

### **2. Telecommunications (Collection of Numbering Charges) Determination 2014**

Symbio agrees to the administrative changes being made to this Determination

### **3. Telecommunications (Numbering Charges) (Allocation Charge) Determination 2015**

Symbio has previously commented on the heavy reliance on charges for the allocation 13/1300/1800 numbers and the desirability of a better balance with the charges collected for all number types. However, Symbio notes the proposal for a more comprehensive review of numbering charges when the Numbering Services contract is reviewed and will hold further comments until that time.

Symbio agrees to the following changes:

- reference to mobile number instead of digital mobile number
- adding IoT numbers
- removing premium rate numbers
- removing calling card and paging services numbers
- adding IoT and public safety numbers with a base amount of \$57

### **4. Future considerations**

- (a) **Annual Numbering Charges and Allocation Charges**- we note that some stakeholders have suggested changes to the ANC, particularly that the exemption

for geographic numbers be revoked. Symbio suggests that any changes to numbering charges be reviewed holistically and include both ANC and Allocation charges.

Symbio proposes that the ACMA re-examine the funding model with a view to identifying an approach that more equitably allocates the cost of the Numbering System to all users of numbers. Symbio would like to see the charging structure completely overhauled so that it distributes the cost of the Numbering System **across all holders of numbers rather than recovering the cost only from allocation charges**. Symbio believes that the current model unfairly penalises users of 13/1300/1800 numbers as these are allocated as single numbers rather than as a numbering block as for mobile and geographic numbers.

- (b) **Multiple Service Practice (MSP)**- we understand that issues around MSP are being addressed in other work programs and agree that any impacts on numbering charges be addressed following completion of this work.

Symbio looks forward to further discussing these responses with the ACMA at a convenient time.

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