



Submission in response to
ACMA Consultation Paper

**Proposed changes to
numbering charges
determinations**

Public Version

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OPTUS SUBMISSION

1. Optus welcomes the opportunity to provide feedback to the Australian Communications and Media Authority (ACMA) consultation on *Proposed changes to numbering charges determinations* (the Consultation Paper).
2. Optus considers that all numbering charges should continue to adhere to the general principles of transparency and efficient cost recovery.
3. It follows that absent a thorough review of numbering charging structures and potential inequity concerns relating to how some existing charges are levied, we therefore consider that extending the existing charging arrangements will ensure continuity and efficient operation of the existing Numbering Plan arrangements until such time that a more thorough review is undertaken.
4. In general, Optus supports the ACMA proposal to remake the three numbering charges determinations due to sunset in 2025 to largely align for some of the proposed changes in the Numbering Plan and associated instruments being considered in parallel to this consultation. These include:
 - (a) Telecommunications (Annual Charge) Determination
 - (b) Telecommunications (Collection of Numbering Charges) Determination
 - (c) Telecommunications (Numbering Charges) (Allocation Charge) Determination
5. In particular, we welcome the proposed change to make IoT number ranges low or no charge given the rationale they generate minimal revenue and do not require the full capability of a mobile number.¹ This will enable greater take up of innovative IoT/M2M services and applications in Australia.
6. Optus also has no concern with editorial changes in related regulation as a result of remaking the instruments.
7. In addition, Optus acknowledges the issues ACMA has flagged for future consideration, including a more holistic review of all numbering exemptions, charging structure review and multiple-service practice concerns. Optus supports a more thorough review of these arrangements in future.
8. The remainder of this submission sets out Optus' brief comments on the draft instruments and issues raised in this consultation.

Draft Telecommunications (Annual Charge) Determination 2025

9. The Annual Charge Determination is a longstanding arrangement as understood by industry for the recovery of annual numbering charges. The ANC generally continues to recover up to the \$60 million annual revenue target.
10. We welcome the proposed changes designed to support changes being proposed to the Numbering Plan which the ACMA is also currently consulting on. These include:

¹ ACMA, 2024, Proposed changes to numbering charges determinations, Consultation Paper, December, p.9

- (a) Adding IoT service numbers as a low-charge number; and
 - (b) Adding public safety service numbers as exempt from charge
11. Optus also acknowledges that given the proposed timing of this consultation process; it is unlikely that the proposed changes will take effect before the 2026 ANC collection process. We also support the exemption for public safety service being limited to service numbers used by the Emergency Call Person.

Draft Telecommunications (Collection of Numbering Charges) Determination 2025

12. The Collection of Numbering Charges Determination sets out the ANC collection process, including due dates and classification of late payment amount and processes.
13. We welcome the proposed changes which the ACMA acknowledges is to be made in substantially the same form with minor consequential changes to the existing instrument.

Draft Telecommunications (Numbering Charges) (Allocation Charge) Determination 2025

14. The Allocation Charge Determination is required by the ACMA to support the cost recovery of numbering services, consistent with the Australian Government Charging Framework, and specifically relating to charges for the allocation of all numbers (except geographic numbers), including free and local rate numbers (FLRNs), premium rate numbers (PRN) and mobile numbers.
15. This instrument also essentially entrenches the ANC methodology and collection process set out in the previous two charging arrangement instruments.
16. We welcome the proposed changes designed to support changes being proposed to the Numbering Plan which the ACMA is also currently consulting on. These include:
- (a) Removing premium rate, paging, and calling card service number types; and
 - (b) Adding IoT and public safety service number types
17. However, while we note the proposed changes to specified number types, we consider that a full review to fees and fee model should still be conducted as soon as practicable.

Changes to the Telecommunications (Charges) Determination 2022

18. The Charges Determination operates in parallel with the Allocation Charge Determination for the cost recovery of numbering services, and specifically relating to charges related to the allocation of geographic numbers and charges to register as a CSP or a smartnumbers user.
19. We acknowledge that other than updated references designed to support changes being proposed to the Numbering Plan which the ACMA is also currently consulting on, no other changes are being proposed at this time. Optus has no concerns with these editorial changes.

Future considerations

20. Optus acknowledges the issues flagged by the ACMA for future consideration. The use of numbers and number types continue to evolve as new technology innovations and use cases arise. This is clearly demonstrated with the recognition of IoT services warranting the inclusion as a service number type. It follows that incentivising the return

of unused numbers to the numbering pool could enable certain number types or number ranges to be efficiently reallocated or repurposed for other use cases.

21. Further, the use of numbers by multiple-service providers (MSPs) presents a potential cost burden. This is currently a concern with the operation of the Numbering Plan that is further complicated by the inequitable nature of how numbers used in MSP scenarios are recovered. A basic tenet of cost transparency and efficient cost allocation should be that costs are incurred by the party who primarily uses that number for all intents and purposes. It should not matter whether the primary user is a CSP or not.
22. Optus submits that these issues need further detailed review to ensure ongoing transparency and efficient allocation of numbers. Therefore, Optus supports a holistic review of the current fees and charging arrangements applicable to the allocation of numbers. We accept the current limitations flagged by the ACMA for conducting this review as part of this consideration, therefore welcome a future review of the fees structure and model in line with any changes to the arrangements for numbering changes.
23. Optus also suggests these matters be included by the ACMA in a future roadmap for consultation.