

Proposed changes to the draft Telecommunications (SMS Sender ID Register) Industry Standard 2025

Consultation paper

JULY 2025

Canberra

Level 3
40 Cameron Avenue
Belconnen ACT

PO Box 78
Belconnen ACT 2616

T +61 2 6219 5555
F +61 2 6219 5353

Melbourne

Level 32
Melbourne Central Tower
360 Elizabeth Street
Melbourne VIC

PO Box 13112
Law Courts
Melbourne VIC 8010

T +61 3 9963 6800
F +61 3 9963 6899

Sydney

Level 5
The Bay Centre
65 Pirrama Road
Pyrmont NSW

PO Box Q500
Queen Victoria Building
NSW 1230

T +61 2 9334 7700
F +61 2 9334 7799

Copyright notice

<https://creativecommons.org/licenses/by/4.0/>

Except for the Commonwealth Coat of Arms, logos, emblems, images, other third-party material or devices protected by a trademark, this content is made available under the terms of the Creative Commons Attribution 4.0 International (CC BY 4.0) licence.

All other rights are reserved.

The Australian Communications and Media Authority has undertaken reasonable enquiries to identify material owned by third parties and secure permission for its reproduction. Permission may need to be obtained from third parties to re-use their material.

We request attribution as © Commonwealth of Australia (Australian Communications and Media Authority) 2025.

Introduction	1
The sender ID register	3
March/April 2025 Consultation	5
Revised scope of the standard	6
International entities and use of the ABR	7
Original proposal	7
Summary of submissions	7
New proposal	9
Overview of new proposal	9
Detailed description of new proposal	11
Valid use cases	20
Original proposal	20
Summary of submissions	20
Revised proposal	20
Implementation timeframe	22
Original proposal	22
New proposal	22
Invitation to comment	23
Making a submission	23

Introduction

Telecommunications scams have been targeting Australians on an industrial scale, with increasing sophistication and significant impacts. As well as financial losses, scams can lead to reduced consumer trust and confidence and can have negative reputational and other non-financial impacts for businesses. For scam victims, the impact of falling for a scam can be devastating and life changing.

Short Message Service (SMS) – and Multi-Media Service (MMS) – are key communication channels used by scammers to reach Australians. In 2024, ScamWatch received 77,365 reports of SMS scams, with reported losses of over \$14 million.¹ Losses from scam SMS reported to ScamWatch in May 2025 increased by 79% compared to May 2024.² SMS scams accounted for 31% of all reported scams across all communication channels. The Australian Taxation Office (ATO) reports that SMS is one of the primary channels used by scammers when targeting the community, accounting for 13.1% of impersonation scams reported from July 2024 to January 2025.³

The Australian Communications and Media Authority (ACMA) is responsible for establishing and maintaining the SMS sender ID register (register). The register will protect consumers, and enhance the brand trust of entities that send SMS/MMS messages to consumers, by disrupting scam messages that use alphanumeric sender IDs (sender IDs).

In March/April 2025, the ACMA consulted on the proposed operation of the register and the Telecommunications (SMS Sender ID Register) Industry Standard 2025 (draft standard): [Proposed rules and operation of SMS sender ID register | ACMA](#).

The public consultation and the ACMA's consideration of submissions highlighted concerns about the way international entities and telecommunications companies were treated, and that they should be enabled to participate to prevent a range of significant impacts. Specifically, their lack of ability to participate may lead to non-compliance with existing free trade agreements, potentially disrupting transactional activities that are vital to the Australian economy, and disproportionately affect Australian consumers, including the nation's large migrant population, who often rely on international communication services.

After careful consideration of all the submissions received, we propose changes to the draft standard. Some of these changes are relatively minor, but more significant changes are proposed to address the following issues:

- inclusion of Electronic Messaging Service Providers (EMSPs) that send SMS
- participation of international entities and telcos
- use of the Australian Business Register (ABR) to verify entities and entity representatives
- use of the term 'Unverified' rather than 'Likely SCAM' when over-stamping sender IDs
- how valid use cases should be established

¹ Australian Competition and Consumer Commission, 'Scam Statistics', ScamWatch (2024), <https://www.scamwatch.gov.au/research-and-resources/scam-statistics>.

² Reported losses from scam SMS increased from \$907,379.40 in May 2024 to \$1,625,933.77 in May 2025. Australian Competition and Consumer Commission, 'Scam Statistics', ScamWatch (2024-25), <https://www.scamwatch.gov.au/research-and-resources/scam-statistics>.

³ Australian Taxation Office, Scam Channel Data, <https://www.ato.gov.au/online-services/scams-cyber-safety-and-identity-protection/scam-data>.

- the implementation timeframe for the register
- provision of information to message recipients.

This paper outlines these more material proposed changes for feedback. The paper does not include all the issues covered in the March/April consultation paper. We will consult separately on a register determination that is likely to cover:

- the register/sender ID application process (including the types of sender IDs that can be registered)
- access to the register
- administration of the register.

The sender ID register

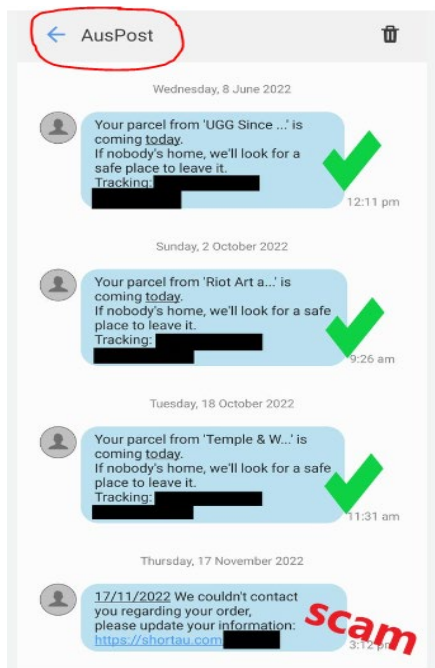
The ACMA is responsible for establishing and maintaining the SMS sender ID register. The register will protect consumers and, by extension entities that send SMS/MMS messages to consumers, by disrupting scam messages that use sender IDs.

Sender IDs are message headers that businesses, not-for-profits and government agencies (entities) use so that message recipients can immediately identify the sender of a message, for example, myGov, ATO, CBA, AusPost.

All messages from the same sender ID are filtered into one message thread on recipients' mobile devices, further cementing the association between the message and the sender.

A common technique used by scammers is to send messages using the sender IDs of well-known entities, to trick people into believing they are dealing with that entity. Message recipients are prompted to click on a link or call a number included in the body of the scam message. Scammers attempt to create a sense of urgency in the message, for example, by claiming a bill or toll is overdue, a delivery needs to be redirected, or reward points are about to expire. When people respond to these prompts, their money or personal information may subsequently be stolen.

Figure 1: Message thread for the sender ID 'AusPost' showing scam SMS in the same message thread as legitimate SMS from Australia Post.



The register will prevent scammers from impersonating sender IDs by:

- requiring registration of all sender IDs that are used to send SMS/MMS messages to Australian mobiles
- only allowing legitimate entities and their authorised contacts to register and use sender IDs

- disrupting messages that have unregistered sender IDs (in most cases by replacing the unregistered sender ID with a warning – discussed further in the International entities and use of the ABR section below).

The register is part of a suite of Australian Government initiatives to combat scams and protect Australians from financial harm, including the standing up of the National Anti-Scam Centre and introduction of the Scams Prevention Framework (SPF).⁴

⁴ [Scams Prevention Framework – Protecting Australians from scams | Treasury.gov.au.](#)

March/April 2025 consultation

From late March to late April 2025, the ACMA consulted on the proposed operation of the register and the draft Telecommunications (SMS Sender ID Register) Industry Standard 2025 (draft standard).⁵

A total of 41 submissions were received. As noted in the consultation paper, the ACMA will not publish these submissions due to concerns about how the information may be used by bad actors.

Submitters were broadly supportive of several aspects of the ACMA's proposed approach to the register. Some of these suggested changes are incorporated in the amended draft standard (available in conjunction with this paper).

We received significant feedback about:

- whether international entities should be able to register sender IDs or how sender ID messages from international entities should be treated
- the use of the Australian Business Register (ABR) to verify entities and entity representatives
- how valid use-cases should be established.

We have addressed these views and have a revised set of key issues for consultation. Each of these include:

- an overview of the proposal in the March/April consultation paper
- a summary of the submissions received
- our revised proposal (including a reference to the relevant section of the draft standard).

We are also proposing a change to the scope of the standard, discussed in the next section.

Some submissions raised concerns about the implementation timeframes. To enable the ACMA to consult on these proposed amendments, the Minister amended the Direction to determine a standard. Accordingly, the industry standard must now be made by 30 September 2025. The timeframe for the register to commence in full remains at the earliest practical opportunity and no later than 15 December 2025.

⁵ [Proposed rules and operation of SMS sender ID register | ACMA](#).

Revised scope of the standard

The draft standard released for consultation in March/April 2025 applied to *CSPs* (including SMS aggregators) and *carriers* that send, transit or terminate sender ID messages.

EMSPs were not in scope and therefore could not directly participate in the register. However, participating telcos could send sender-ID messages on behalf of EMSPs.

Following consideration of feedback, we now propose that the standard should apply to:

- CSPs
- carriers
- EMSPs

that send, transit or terminate sender ID messages.

As the ACMA can only enforce the register obligations in relation to Australian providers, only CSPs, carriers and EMSPs that have an ABN will be permitted to directly participate. EMSPs will be subject to the same obligations as originating CSPs/carriers. For the purposes of this paper and the standard, CSPs, carriers and EMSPs are collectively referred to as 'telecommunications providers' (telcos).

The direct participation of EMSPs ensures that all providers involved in sending SMS/MMS are treated equitably and are subject to the obligations of the register.

Question 1

Does the broadened scope of the standard adequately capture all parties that send, transit or terminate sender ID messages?

International entities and use of the ABR

Original proposal

In our March/April consultation, we proposed that:

- only Australian telcos could participate in the register (noting the ACMA cannot enforce rules against non-Australian telcos)
- non-participating telcos (including international telcos) cannot send, carry or terminate sender ID messages to Australian mobiles (noting originating participating telcos can send messages on behalf of EMSPs (including international EMSPs) that initiate messages for Australian entities)
- participating telcos cannot accept/send sender ID messages from/to non-participating telcos.

We also proposed that:

- only entities registered on the ABR (entities with an ABN) could participate in the register and register sender IDs
- entity representatives would be required to pass an ID check (which requires Australian ID documents) before they could register
- the person making the first application to participate in the register would be cross-referenced against the ABR to verify they are an authorised contact for the entity
- the entity would be cross-referenced against the ABR to verify it is legitimate.

The sum effect is that all sender ID messages from international entities (and Australian entities without an ABN) to Australian mobiles would be:

- blocked – if they are originated by a non-participating telco (international or domestic)
- over-stamped – if they are originated by a participating Australian telco.

Summary of submissions

International participation

24 submitters expressed views on whether international entities (international entities without an ABN) should be allowed to participate in the register. 21 submitters supported international participation, with appropriate safeguards, for one or more of the following reasons:

- Restricting the register to Australian registered entities (and telcos) may be contrary to international trade agreements or discriminatory against foreign entities. It may also inhibit international trade, resulting in increased costs and decreased choice for Australians, as it becomes more difficult and expensive for international entities to reach them.
- Australia's large migrant population would be disproportionately affected if sender ID messages from international entities were blocked or over-stamped. A high proportion of migrants and first-generation Australians maintain close ties with international entities in their countries of origin (for example banks, government agencies, healthcare services). Many of these entities provide services that involve sending SMS with sender IDs.

Overseas visitors on extended stays who use a local mobile number would similarly be affected.

- Australian consumers will be negatively impacted if they don't receive international messages, for example, banking, online shopping/commerce, reservations, travel, shipping/parcel notifications. It will also result in less consumer choice.
- There will be customer confusion and complaints, for example, from customers who cannot log into international websites as they haven't received a passcode or miss travel connections because they didn't receive a message about a change of flight time.
- It's likely that many international entities won't be aware of the new sender ID requirements in Australia, so they won't know their traffic is being disrupted, resulting in reputational damage.
- Even if legitimate messages are over-stamped rather than blocked, those messages may be ignored by recipients if they are labelled as likely scams. This will reduce or prevent Australians access to international goods/services and may expose them to additional costs (such as late charges), or loss (for example, they miss a time-sensitive alert from an international bank about suspicious activity).
- Conversely, if all international messages are over-stamped (irrespective of whether they are legitimate or scams), recipients will become desensitised to the warning, undermining the objectives of the register. It may also increase the prevalence of scammers spoofing international entities, as legitimate messages and scams will be indistinguishable.
- There would be a significant impact (including revenue and competition) for telcos and entities if international entities cannot send sender ID messages to Australia.
- International entities will not benefit from the register's safeguards and Australians may experience increased exposure to scams through unprotected channels (for example, OTT, emails).
- It could jeopardise the safety of Australians travelling overseas if international governments send emergency alerts to Australian mobile numbers and those messages are blocked due to the exclusion of international entities and telcos from the register.

Use of ABR

Twenty-seven submitters commented on the participant application process, including use of the ABR. Two key issues were raised:

1. **ABR Integrity** – Relying on the ABR to check if an entity is legitimate or if someone is an authorised representative for an entity carries significant risks. Registration does not necessarily mean the entity is legitimate, and as ABR data is dependent on business entities updating their details when they change, it is unable to guarantee the information on the ABN lookup website is accurate, up to date or complete.
2. **Too restrictive** – Only allowing entities who are on the ABR to participate in the register is overly restrictive. It prevents international and domestic entities without an ABN from participating in the register and registering sender IDs. Domestic entities without an ABN may include:
 - schools and educational institutions
 - small non-profit organisations
 - religious institutions or trusts
 - social clubs and council groups
 - hobby groups or neighbourhood sports groups

- individuals hosting one-off events, content creators or digital personalities
- foreign embassies and consulates based in Australia
- government entities/agencies
- small sole traders.

In this paper, we focus on the second issue – restrictions. Reliability issues will be covered when we consult on the register determination within the next couple of months.

New proposal

While many scams originate overseas, there are also many legitimate, time-sensitive and critical messages (e.g. from banks or airlines) sent to Australian consumers from international entities. In addition, Australian businesses may engage the services of a global platform (e.g. Shopify) that uses an international telco provider to send messages to Australian consumers. Blocking or over-stamping all these messages could cause significant detriment to consumers and entities.

For these reasons and following consideration of submissions, we propose an avenue for entities without an ABN (international and domestic) to participate in the register, with appropriate safeguards.

We also propose that the term 'Unverified' be used initially to over-stamp unregistered sender IDs before they reach consumers, replacing the previously proposed label 'Likely SCAM'. Although the term 'Likely SCAM' provides a more direct alert to message recipients to exercise caution, it also carries risk of consumer fatigue and confusion where legitimate messages from unregistered sender IDs are mislabelled, particularly in the early stages following commencement of the register.

To support the transition to the SMS messaging landscape post register implementation, we welcome feedback on a potential transitional labelling arrangement. Under this proposal, 'Unverified' would be used to over-stamp unregistered sender IDs for an initial period from when the industry standard takes effect. After this initial period, the term could be changed to 'Likely SCAM'. This transitional period would give organisations time to register their sender IDs and align with the new compliance requirements without their messages being labelled as likely scams. The ACMA is seeking feedback on this proposal, including the length of any transition period (i.e. 6 or 12 months from when the industry standard takes effect).

The following section provides an overview of the ACMA's proposed approach to entities without an ABN, followed by a more detailed description.

Overview of new proposal

Objectives

- **Entities** – To treat domestic and international entities as equitably as possible. We propose to do this by allowing:
 - entities without an ABN (domestic or international) to register sender IDs, provided they meet the requirements of subsection 484F(2) of the *Telecommunications Act 1997* i.e. *are either*: (a) an individual; (b) a body corporate; (c) a corporation sole; (d) a body politic; (e) a government entity; (f) a partnership; (g) any other unincorporated association or body of persons; (h) a trust; or (i) a superannuation fund.

- messages with registered sender IDs to be delivered to Australian mobiles without disruption (subject to certain conditions), irrespective of whether they originated domestically or internationally.
- **Telcos** – To enable domestic and international telcos to participate in the register as equitably as possible, recognising that the ACMA does not have power to enforce rules against international telcos. We propose to do this by:
 - requiring domestic telcos (with an ABN) to apply to the ACMA if they want to participate in the register, so they can register and send sender ID messages for entities with an ABN.
 - allowing participating telcos to seek certification from the ACMA to enable them to:
 - register sender IDs on behalf of entities without an ABN
 - send/transit sender ID messages for the sender IDs they have registered for entities without an ABN.
 - allowing international telcos to partner with participating telcos and certified participating telcos to register sender ID messages.

Process for registering and sending messages for entities without an ABN

- Participating telcos (PTs) can apply to the ACMA to become certified telcos (CTs).
- To be approved as a CT, the standard will require a PT to demonstrate to the ACMA that it has robust processes to confirm the:
 - ID of the person making the application
 - that the person is an authorised representative of the entity
 - the entity is legitimate
 - valid use case for sender IDs.
- Via contractual arrangements, international telcos can partner with:
 - PTs – to register and send sender ID messages for entities with an ABN
 - CTs – to register and send sender ID messages for entities without an ABN.
- These international partners will not have access to the register.
- Entities without an ABN can apply to a CT or a CT's international partner (international telcos who have partnered with CTs) to participate in the register.
- CTs would:
 - conduct the ID and entity checks that would usually be conducted via the register prior to registration (as well as confirm the valid use case for sender IDs)
 - once the non-ABN entities are registered, manage entity register accounts on their behalf (non-ABN entities would **not** have direct access to the register)
 - originate messages (directly or from their international partners) for the non-ABN entity.
- CTs would be subject to rules, including requirements to conduct ID and entity checks, which make them accountable for the registration of entities and sender IDs. If found in breach, a CT's certification could be revoked and potentially also their participation status. They may also be subject to additional enforcement action
- Sender ID messages that come from an entity without an ABN would not be disrupted so long as they are sent via a CT or a CT's international partner.

- Sender ID messages that are not sent via a CT or its international partners would be over-stamped. Where messages are sent by an international entity, the participating transiting telco who receives the messages from overseas would be responsible for over-stamping.
- CTs would be subject to rules that make them accountable for the registration of sender IDs.

Detailed description of new proposal

The ACMA's proposed approach to entities with an ABN is largely the same as the approach set out on the March/April consultation paper, but it is included in the diagram and following section for completeness.

Figure 2: Overview of proposed treatment of sender ID messages, domestic and international.

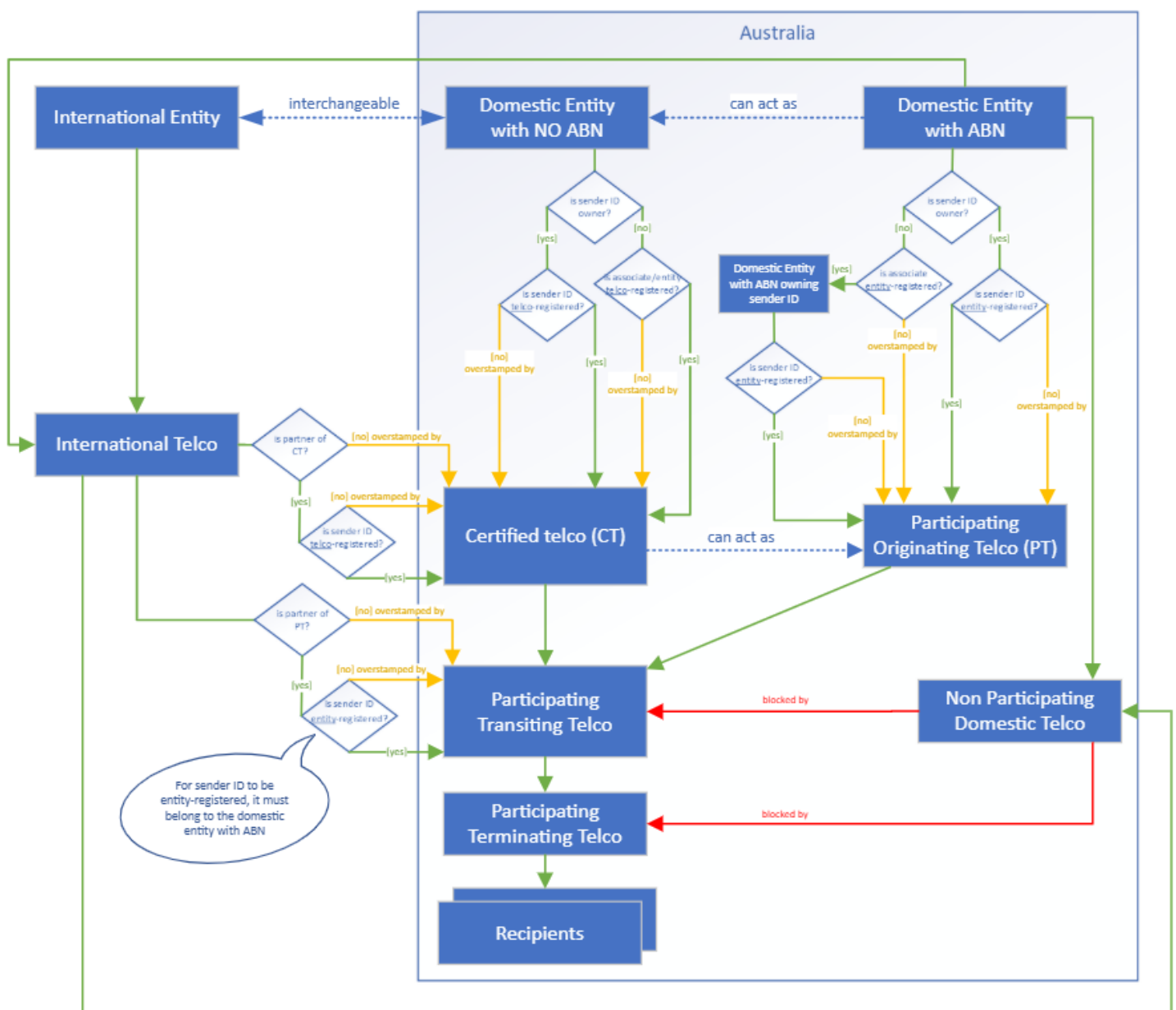


Diagram notes:

- A telco may have different obligations in different circumstances. For example, it may be an originating telco in one circumstance, and a transiting or telco in another circumstance.
- **Entity-registered** means the entity has registered the sender ID directly with the ACMA, or through a participating telco, and the entity has subsequently accessed the register to confirm that registration.
- **Telco-registered** means the sender ID has been registered by a CT. The entity does not have access to the register.
- **Entity associates** are third parties, such as marketing agencies, that send messages on behalf of entities.
- All over-stamped traffic will be delivered to recipients (not shown on diagram).

Definitions for this section – see also definitions in the draft standard at Attachment A.

Certified telco (CT): A telco that has been authorised by the ACMA to:

- register sender IDs on behalf of international entities and domestic entities (with or without an ABN), by conducting ID and entity checks normally done via the register, and establishing valid use cases.
- send/transit sender ID messages for the sender IDs it has registered.

CTs are accountable for registration of sender IDs.

Domestic entity: An entity with an ABN.

Domestic non-participating telco (DNPT): A telco with an ABN that is not participating in the register (approval has not been sought, has not been granted, or has been revoked).

Domestic telco: A telco with an ABN.

Entity associate: An entity that applies to register a sender ID and/or sends sender ID traffic on behalf of another entity.

International entity: An entity that does not have an ABN.

International non-participating telco (INPT): A telco without an ABN who has not partnered with a PT/CT to participate in the register (international telcos are unable to directly participate in the register).

International partner: An international telco without an ABN who has partnered with a:

- CT, for entities without an ABN (international or domestic), or
- PTs, for entities with an ABN

where the PT/CT applies to register sender IDs and/or sends sender ID traffic on behalf of the international partner that has a direct relationship with an entity.

International telco: A telco that does not have an ABN.

Participating telco (PT): A telco with an ABN that is approved by the ACMA to participate in the register. Participating telcos can only initiate registration for entities with an ABN.

Telco: A CSP, carrier or EMSP.

Domestic telcos

All domestic telcos that are involved in originating, transiting or terminating sender ID messages will be required to apply to the ACMA to participate in the register (section 7 of the draft standard). This process involves the ACMA confirming that:

- the applicant is a telco
- the telco has an ABN (via the ABR)
- ID of the person making the application (via Australia Post's Digital ID service or the government's myID app)
- person is an authorised representative of the telco (via the ABR).

Participating telcos (PTs) will be able to:

- send sender ID messages for entities with an ABN
- transit/terminate sender ID messages to/from other participating telcos
- transit sender ID messages from international telcos (these messages will be over-stamped rather than blocked).

Participating telcos must not send/accept sender ID messages to/from domestic non-participating telcos (DNPT) (subsections 16(5), 17(2), and 18(2) of the draft standard).

DNPTs will be prohibited from originating, transiting and terminating sender ID messages (section 15 of the draft standard).

The sum effect of these requirements is:

- there should not be any DNPTs that carry sender ID traffic in Australia.
- if there are any sender ID messages from DNPTs, those messages will effectively be blocked, and the ACMA will take enforcement action against the DNPT for breach of section 15.

PTs can partner with international telcos (international partners) - see section below.

International partners

International telcos cannot directly participate in the register and will not have access to the ICT system for the register.

If an international telco would like to facilitate registration of (and subsequently initiate messages for) a sender ID for:

- An entity with an ABN – it must partner with a PT.
- An entity without an ABN – it must partner with a CT (see next section).

We envisage this would work as follows:

- An international partner has a direct relationship with an end user that sends sender ID messages.
- The international partner has a contractual arrangement with a PT or CT and the terms of that arrangement require the international telco to act in a way that is consistent with the requirements of the register standard.

- The PT/CT would be accountable for these arrangements (see section 13 of the draft standard).
- Any notifications from the register (e.g. confirmation that a sender ID application submitted by a PT/CT has been submitted or approved) would reference the international partner, not the PT/CT, as the international partner has the direct relationship with the entity.

International non-participating telco (INPTs)

If an INPT sends sender ID messages to Australia, the transiting PT that receives the messages from overseas must over-stamp all of those messages (regardless of whether the sender ID is registered or unregistered) with 'Unverified'.

If the domestic telco that receives the messages from overseas is not a participating telco, the messages will effectively be blocked, as those messages will not be accepted by subsequent participating transiting or terminating telcos in the supply chain. As previously noted, however, domestic telcos should be participating telcos.

Certified telcos (CTs)

PTs can apply to the ACMA for certification to register sender IDs and send messages for entities without an ABN (domestic or international).

The incentive for PTs to seek this certification include:

- commercial/economic – to enable them to send sender ID messages for international entities and Australian entities without ABNs
- scam prevention – to prevent scam traffic from entering/proliferating in Australia (also relevant to their likely obligations under the SPF).

To be approved as a CT, section 8 of the draft standard requires a PT to apply to the ACMA for approval. The approval process will be included in a register determination and will likely include requirements to demonstrate to the ACMA's satisfaction that it has robust processes to confirm:

- the ID of the person making the application for an entity
For example, for international entities, by using an ID verification service that operates in the international entity's country.
- that the person is an authorised representative of the entity
For example, for international entities, by checking that the person is listed as an authorised contact for that entity on an accredited business register in that country.
- the entity is legitimate
For example, for international entities, by checking the entity is on an accredited business register in that country, or for a domestic entity without an ABN, by checking it has an ACN. CTs must also check that the entity meets the requirements of subsection 484F(2) of the *Telecommunications Act 1997*.
- a valid use case for sender IDs requested by the entity
For domestic entities without an ABN, by complying with subsection 11(4) of the standard, and for international entities, by complying with subsection 12(2) of the standard.

While the primary purpose of the certification is to enable domestic telcos to register and send sender ID messages for entities *without* an ABN, CTs can also register sender IDs for entities *with* an ABN. When dealing with an entity with an ABN, the CT can act as either a:

- CT – it registers for the entity and is accountable for the registration, or
- PT – it initiates the registration, but the entity remains accountable.

Whether the CT acts as a CT for entities with an ABN is determined by:

- the entity's preference
- the CT's agreement to act as CT for that entity.

Entities with an ABN may prefer the CT registration option because they do not need to access the register (which requires ABR checks and Australian ID checks). This means:

- the entity's participation may not be reliant on its ABR records being up to date and including current/accessible contacts (depending on the mechanism/s a CT uses to verify an entity and its authorised representatives).
- entity employees that do not have Australian IDs can represent the entity for the purposes of the register through a CT (for example, where an entity with an ABN has offices and staff offshore).

CT rules

If certification is granted, the CT will be subject to rules (sections 11 and 12 of the draft standard). These rules require the CT to:

- before submitting an application to the ACMA for approval, conduct the checks above each time it registers a sender ID for an entity without an ABN (domestic or international), or where agreed, it registers a sender ID for an entity with an ABN.
- within 24 hours of receipt, provide entities (or via a telco partner if one is involved) any notifications from the ACMA (e.g. advice that the ACMA has approved/refused the application) and action requests to remove sender IDs from the register, as entities without an ABN don't have access to the register and can't do it themselves.
- retain evidence it has complied with these requirements, which must be provided to the ACMA on request.

The register will require CTs to confirm a valid use case for every sender ID they register, even if that sender ID has already been registered by another CT. This is different to the registration process for PTs, where the valid use case only needs to be confirmed by the PT who initially registers the sender ID. The reason for this difference is CTs are accountable for the registration of sender IDs.

Where a CT has international partners, the CT must:

- apply to register the sender ID (that is, it must access the ICT system for the register to submit the application – a CT cannot delegate this responsibility to an international partner, as they do not have access to the ICT system for the register).
- have contractual arrangements in place to make sure the international partner is acting in accordance with the register requirements. For example, arrangements requiring the international partner to conduct the required entity and ID checks on the CT's behalf.
- pay any registration fees (it is up to the CT to make arrangements to recover any fees from the international entity).

If the ACMA finds the CT did not comply with these rules, the CT's certification could be revoked and potentially also their participation status. The CT may also be subject to additional enforcement action.

Entities with an ABN

Entities with an ABN must apply to register if they want to send messages with sender IDs.

Application via a PT

If an application is made via a PT (including to an international partner of the PT) or directly to the ACMA, the ACMA (via the register) will check the:

- ID of the person making the application
- person is an authorised representative of the entity
- entity's ABN.

If the application is made via an originating PT (or an international partner of the PT), the PT is responsible for confirming the entity has a valid use case for the sender ID (subsection 11(4) of the draft standard). If the application is made to the ACMA directly, the ACMA will conduct this check. In both scenarios, the ACMA is responsible for approving the application.

Entities with an ABN will have access to the ICT system for the register and will be able to manage their own register account.

Application via a CT

There are 2 options if an application is made via a CT:

1. **CT applies as PT** - The application is treated the same way as applications made via PTs (as described above). In this scenario, the entity will be required to access the ICT system for the register to confirm registration and manage its own register account.
2. **CT applies as CT** - The CT registers on the entity's behalf and is accountable for the entity (the same process as entities without an ABN - see section below). In this scenario, the entity does not access the ICT system for the register.

If an entity with an ABN arranges to send sender ID messages with **unregistered** sender IDs through an:

- originating PT/CT (or international partner): messages will be over-stamped with 'Unverified'
- domestic non-participating telco (DNPT): messages will be blocked
- international non-participating telco (INPT): messages will be over-stamped with 'Unverified'.

If an entity with an ABN arranges to send sender ID messages with **registered** sender IDs through an:

- originating PT/CT (or international partner): messages will be delivered
- DNPT: messages will be blocked
- INPT: messages will be over-stamped with 'Unverified'.

Table 1: Summary of treatment of sender ID messages sent by entities with an ABN

Sender ID registration status	Message originated via PT/CT or international partner	Message originated via DNPT	Message originated via INPT
Unregistered	Delivered, but over-stamped with 'Unverified'	Blocked	Delivered, but over-stamped with 'Unverified'
Registered	Delivered, unmodified	Blocked	Delivered, but over-stamped with 'Unverified'

The following lists will be available on the ACMA's website to enable entities to identify which telcos they can use to register sender IDs and send sender ID messages:

- All PTs and PT international partners – can only be used by entities with an ABN
- All CTs and CT international partners – can be used by international or domestic entities (with or without an ABN).

Entities without an ABN (international and domestic)

International entities cannot directly participate in the register. The ACMA does not have powers to monitor and enforce compliance against international entities. In addition, international entities do not have an ABN, and their representatives may not have Australian IDs, so they cannot access the register ICT system through ACMA Assist (the ACMA's online portal for the register).

We do not believe a manual entity or ID verification process is a feasible alternative to the ABR, as ID documents and letterheads can easily be falsified.

If an entity without an ABN would like to register sender IDs, they must contact:

- a CT, or
- a CT's international partner.

Entities without an ABN will have to register with each CT/ international partner they would like to send messages for them. Multiple CTs can register the same sender ID.

Sender ID messages from entities without an ABN will be treated as follows:

- If the sender ID is **registered** by a CT, and the sender ID messages are sent by the CT (or by the CT's international partner to the CT), the messages will be delivered to the end user (no blocking or over-stamping). For international traffic, this means the messages enter Australia through the CT. e.g. International entity → CT partner → CT → PT (transit) → PT (terminate) = **no disruption**.
- If the sender ID is **not registered** by that CT, the CT must over-stamp the sender ID with 'Unverified' before sending the messages to a participating transiting or terminating telco for delivery to the message recipient (see Figure 2 on page 11 for further information).

Entities without an ABN will not have access to the ICT system for the register and therefore will not receive email notifications from the register. CTs will be responsible for providing notifications from the ACMA to these entities and recovering any register costs from the entity (or through the international partner if one is involved).

Table 2: Summary of treatment of sender ID messages sent by international entities without an ABN

Sender ID registration status	International entity → CT*	International entity → PT International entity → INPT → PT International entity → CT international partner → PT International entity → INPT → CT International entity → CT# International entity → CT's international partner → CT#	International entity → INPT → DNPT International entity → CT's international partner → DNPT
Unregistered	Delivered, but over-stamped with 'Unverified'	Delivered, but over-stamped with 'Unverified'	Blocked
Registered	Delivered, unmodified	Delivered, but over-stamped with 'Unverified'	Blocked

* where the CT registered the sender ID for the international entity.

where the CT did not register the sender ID for the international entity.

Entity associates (third-party authorisation)

We propose to allow third parties (entity associates) to use a sender ID where authorised by an entity that has a valid use case for that sender ID. This would cover the following types of scenarios:

- an entity using a marketing or communications agency to send messages on its behalf
- a sports club permitted to send messages using a sender ID that belongs to the sports league.

The entity partner process enables some flexibility in how entities send their messages, while protecting entities from being impersonated by scammers claiming to be authorised third parties.

Overview of the proposed entity partner registration process for entities with an ABN:

- Where a third party (entity B) wants to register/send messages on behalf of another entity (entity A), entity B will contact an originating participating telco (or telco partner).
- The PT will ask entity B if it is registering on its own behalf or for another entity. This will be a standard part of the registration process.
- If entity B indicates it is registering on behalf of entity A, the PT will add entity B as an 'entity associate'. The register will verify 'entity associates' (same process as entity verification), including sending an email to the entity B applicant to confirm the registration.

- At the same time, the PT will start the registration process for entity A, with entity B listed as an entity associate (the PT will be responsible for establishing that entity A has a valid use case for the sender ID).
- Entity A will then receive an email asking it to verify the registration request from entity B, the 'entity associate'.
- The telco cannot send messages for entity B until entity B has confirmed its registration as an associate, and entity A has confirmed registration of its sender ID.

Entities without an ABN can arrange entity partners through a CT. Both scenarios are included in Figure 2 above.

We note that where entity B (e.g. a franchisee) is using the same name as a related entity A (e.g. a franchisor), entity A will be able to register the sender ID via the usual process (rather than via the entity partner arrangements) so long as they can establish a valid use case for the sender ID in accordance with section 11 of the standard.

Question 2

Is the proposed process of allowing certified telcos to register sender IDs and send sender ID messages for entities without an ABN a viable solution to enable participation of international entities and telcos in the register?

Question 3

Could existing commercial telco relationships be leveraged to facilitate the proposed arrangements for international partners?

Question 4

As a telco, if approved to be a participating telco, would you consider applying to become a certified telco? Please elaborate on the reasons for your answer.

Question 5

Do you suggest any amendments to the proposed process to enable participation of international entities and telcos in the register that would improve its operational effectiveness? For example, will participating telcos be able to distinguish between domestic non-participating telcos and international non-participating telcos?

Question 6

Do you believe that the proposed process is appropriate for non-ABN entities?

Question 7

Do you have any feedback about the proposed approach to over-stamping? Should there be a transitional period set out in the standard that requires a specific sender ID to be used for an initial period, before requiring another sender ID to be used, such as 'Likely SCAM'? If so, what period should this be and why?

Valid use cases

Original proposal

In our March/April consultation, we proposed that originating telcos would be required to establish that an entity has a valid use case by:

- confirming that the sender ID is directly associated with the entity's name; for example, by matching the sender ID to entity's registered name on the ABR, or
- requiring an entity to submit evidence proving that the sender ID is directly associated with one of the entity's brand names, for example, a letter or document that proves the brand name (and therefore the sender ID) is associated with that entity.

For example, if the ACMA attempted to register 'ACMA-alert', the sender ID would be accepted. However, if the ACMA attempted to register 'Telco alert', it would not be accepted unless the ACMA could provide evidence that 'Telco alert' is an ACMA brand name.

Summary of submissions

Twenty-six submitters expressed views about whether to require sender IDs to be directly associated with an entity's name or a brand name. Views were almost evenly split, with 13 supporting the proposal, 11 opposing the proposal and 2 expressing qualified support/opposition.

Reasons provided in support of the proposal largely mirrored those included in the consultation paper, namely that it will:

- enable consumers to readily identify who sent the message
- build trust with consumers
- materially strengthen protections against spoofed, misleading, deceptive or generic sender IDs
- provide the ACMA with a clearer framework for enforcement.

Several of the submitters did not support it for reasons including:

- it is too restrictive, does not reflect current practice (as set out in the Reducing Scam Calls and Scam SMS Industry Code) and could exclude legitimate uses
- businesses frequently operate under business or trading names that are different from the legally registered name
- it may constrain government departments wishing to send messages articulating a particular purpose instead of their department name
- entities should be able to use any sender ID, including to reflect products, services or slogans, so long as they can establish a valid use case.

Our revised approach to valid use cases has been informed by suggestions made by submitters.

Revised proposal

To clarify and broaden the methods for establishing a valid use case, section 11 of the draft standard now requires telcos to establish that an entity with an ABN has a valid use case by connecting the sender ID to one or more of the entity's active:

- registered business name, as registered in the Business Names Register ([Business names | ASIC](#))
- company name, as registered in the Australian Business Register ([The ABR explained | ABR](#))
- registered trademark in the Register of Trade Marks ([IP Australia | Trade Mark Search](#)) or an equivalent international register, or
- registered domain name in [WHOIS](#).

Section 12 of the draft standard sets out similar requirements for entities without an ABN.

Allowing entities to use sender IDs that match their business names, trademarks and domain names, in addition to their company name, significantly broadens the options available to entities, while still making sure that the sender ID is connected to the entity.

We have also included an exception where an Australian government agency sends messages about emergencies, public health, safety or security – see sections 11 and 12 of the draft standard.

Question 8

Is the revised approach to establishing a valid use case fit for purpose (to make sure that the sender ID is connected to an entity)? Is there any specific feedback about the proposed registers? Do you suggest any additional changes?

Question 9

Section 11 of the draft standard specifies the required status for company names, business names, trademarks and domain names. Do you agree with the statuses? Please explain your answer.

Question 10

Section 12 of the draft standard requires CTs to establish that Australian non-ABN entities are legitimate. For ABN entities, this would be done by checking the ABR. What methods do you suggest for establishing the legitimacy of non-ABN entities?

Implementation timeframe

Original proposal

In our March/April consultation, we proposed the following implementation timeframe:

- by 30 June 2025 – the ACMA makes the industry standard
- 28 July 2025 – telcos begin to apply for approval to onboard to the register
- 1 October 2025 – participating telcos begin to initiate entity registration
- 15 December 2025 – register protections commence.

Revised proposal

On 30 June 2025, the Minister amended the direction to the ACMA, so that the ACMA must make the industry standard by 30 September 2025. We accordingly propose the following revised timeframes:

- by 30 September 2025 – the ACMA makes the industry standard
- 15 October 2025 – telcos begin to apply for approval to onboard to the register
- 30 November 2025 – participating telcos begin to initiate entity registration
- 15 December 2025 – register protections commence.

Stakeholders have raised significant challenges about the implementation timeframe in the March/April consultation paper. Noting the revised timeframe for implementation, the ACMA will work closely with telcos and entities that will need to engage with the register to assist with the onboarding, to provide clear communication and support, and to mitigate implementation risks. The ACMA is also proposing obligations on telcos to provide public information about how the register will work, and specific information to message recipients about what they will experience upon implementation – see section 27 of the draft standard. In this context, we are seeking feedback about what will assist entities and telcos to engage with the register within the required timeframes, and what may assist consumers immediately before and after implementation.

Question 11

Noting a standard must be made by 30 September 2025 and commence in full on 15 December 2025, what are the barriers to achieving the new staged implementation timeframe and what will assist entities, telcos and consumers in this process?

Please provide reasons for your answer.

Invitation to comment

Making a submission

We invite comments on the issues set out in this consultation paper.

Submissions in PDF, Microsoft Word or Rich Text Format are preferred and can be emailed to senderIDregister@acma.gov.au.

Submissions by post can be sent to:

Silvia Superina
Scam Reduction
Australian Communications and Media Authority
PO Box 13112, Law Courts, Melbourne VIC 8010

The closing date for submissions is **COB, 13 August 2025**.

Please note: No extensions will be granted.

Consultation enquiries can be emailed to senderIDregister@acma.gov.au.

Publication of submissions

We will not publish submissions but may share them with the Department and the Minister for Communications' Office. Confidential information will not be released unless required or authorised by law.

Privacy

View information about our policy on the [publication of submissions](#), including collection of personal information during consultation and how we handle that information.

Information on the *Privacy Act 1988*, how to access or correct personal information, how to make a privacy complaint and how we will deal with any complaints, is available in our [privacy policy](#).