

Investigation report

Summary	
Entity	Optus Mobile Pty Limited as carriage service provider for the Coles Mobile brand
Type of entity	Mobile carriage service provider
Australian Company Number	054 365 696
Relevant Legislation	<i>Telecommunications Act 1997</i> Telecommunications (Mobile Number Pre-Porting Additional Identity Verification) Industry Standard 2020
Date	18 September 2025

Findings

The Australian Communications and Media Authority (the **ACMA**) finds Optus Mobile Pty Limited (**Optus**) as mobile carriage service provider (**CSP**) for the Coles Mobile brand contravened:

- subsection 8(2) of the Telecommunications (Mobile Number Pre-Porting Additional Identity Verification) Industry Standard 2020 (the **Standard**),
- subsection 8(5) of the Standard, and
- because of the above contraventions, subsection 128(1) of the *Telecommunications Act 1997* (the **Act**).

Table 1: Table of contraventions

<i>Legislation</i>	<i>Provision</i>	<i>Number of contraventions</i>	<i>Relevant Period</i>
<i>The Act</i>	<i>Subsection 128(1)</i>	44 contraventions of each provision	23 September 2024 to 23 October 2024
<i>The Standard</i>	<i>Subsection 8(2)</i>		
	<i>Subsection 8(5)</i>		

Reasons

- The reasons for the ACMA's findings, including the key elements which establish the contraventions, are based on:
 - information obtained by the ACMA from the Australian Cyber Security Centre, Australian Financial Crimes Exchange and the Australian Competition and Consumer Commission about alleged unauthorised ports of mobile numbers in October 2024,
 - information obtained from Optus on 1 September 2025 in response to a request for information given to it by the ACMA, and
 - information obtained from Optus on 12 September 2025 in response to preliminary findings given to it by the ACMA on 8 September 2025.

Background

- The purpose of the Standard is to prevent the unauthorised porting of mobile service numbers and reduce harm to consumers arising from the unauthorised activity.

3. The Standard is an industry standard made under Part 6 of the Act. It commenced on 30 April 2020 and applies to:
 - a. CSPs who supply or arrange for the supply of public mobile telecommunications services, and
 - b. every port of a mobile service number.
4. Subsection 128(1) of the Act requires CSPs to comply with standards registered under Part 6 of the Act. Accordingly, CSPs, including mobile CSPs, must comply with the Standard.
5. The Standard requires that the gaining CSP, prior to initiating a port of a mobile service number, must use additional identity verification processes to confirm that the person requesting a port:
 - a. is the rights of use holder¹ (or their authorised representative) for the mobile service number to be ported, and
 - b. has access to a mobile device associated with that mobile service number.

Compliance with the Standard

Subsection 8(2) – requirement to use an additional identity verification requirement

6. Subsection 8(2) requires that a gaining CSP must use at least one additional identity verification process, specified under paragraphs 8(2)(a)—(d) of the Standard, to confirm that the person requesting a port is the rights of use holder of the mobile service number to be ported.
7. The ACMA has considered whether Optus complied with subsection 8(2) of the Standard, by answering the questions set out in Table 2 below.

Table 2: Assessment of compliance with subsection 8(2) of the Standard

Is Optus a mobile CSP?	<p>Optus is a mobile CSP as defined in the Standard as it:</p> <ul style="list-style-type: none"> • is a CSP as defined at section 87 of the Act, and • supplies mobile carriage services to the public. <p>CSPs must comply with the Standard.</p>
Was Optus the gaining CSP?	<p>The Standard defines a gaining CSP as the mobile CSP to which a mobile service number has been or is to be ported.</p> <p>Optus was the gaining CSP, for the Coles Mobile brand, for 44 investigated ports in the Relevant Period.</p>
<p>Did Optus use one of the additional identity verification processes under subsection 8(2) prior to initiating a port?</p> <p>Note: Portions of this content have been redacted due to security sensitivities and to prevent the disclosure of technical vulnerabilities.</p>	<p>Optus did not complete any of the identify verification processes under subsection 8(2) for 44 mobile service numbers ported to it in the Relevant Period through its online form.</p> <p>Evidence obtained from Optus indicates a unique verification code (UVC) was sent via SMS to each of the 44 mobile service numbers in accordance with paragraph 8(2)(b). However, it appears that unknown actor/s [REDACTED]</p> <p>[REDACTED] This occurred due to deficiency in Optus' systems, [REDACTED]</p> <p>[REDACTED]</p>

¹ When a customer is issued with a number in association with a telecommunications service, the customer gains the rights of use to that number.

8. Accordingly, the ACMA finds that Optus contravened subsection 8(2) of the Standard on 44 occasions in the Relevant Period.

Subsection 8(5) – requirement to not proceed with a port without verification

9. Subsection 8(5) of the Standard requires that a mobile CSP must not proceed with a mobile service number port unless one of the additional identity verification processes set out under subsection 8(2) or 8(3) of the Standard has been used by the gaining mobile CSP.
10. The ACMA has considered whether Optus complied with subsection 8(5) of the Standard by answering the questions set out in Table 3 below.

Table 3: Assessment of compliance with subsection 8(5) of the Standard

Is Optus a mobile CSP?	Yes – refer to Table 2 above.
Did Optus use one of the additional identity verification processes under subsection 8(2) prior to initiating a port?	No – refer to Table 2 above. Optus did not use any of the additional identity verification checks under subsection 8(2) for 44 mobile service numbers ported to it in the Relevant Period through its online portal.
Having not used a process under subsection 8(2), did Optus then use one of the additional identity verification processes under subsection 8(3)?	Optus did not use an identity verification process under 8(3) for 44 mobile service numbers ported to it in the Relevant Period through its online portal, noting these processes are only available where a gaining CSP is unable to confirm that the requesting person is the rights of use holder of the mobile service number to be ported under subsection 8(2).
Did Optus proceed with ports without using one of the additional verification processes at 8(2) or 8(3)?	Optus proceeded with 44 unauthorised ports in the Relevant Period without using the identity verification processes at 8(2) or 8(3).

11. Accordingly, the ACMA finds that Optus contravened subsection 8(5) of the Standard on 44 occasions in the Relevant Period.

Compliance with the Act

12. By contravening subsections 8(2) and 8(5) of the Standard as set out above, the ACMA also finds that Optus contravened subsection 128(1)² of the Act on 44 occasions.

² Section 128(3) of the Act provides that subsection 128(1) of the Act is a civil penalty provision.