

**COMMUNICATIONS
ALLIANCE LTD**



**Department of Infrastructure, Transport, Regional
Development, Communications and the Arts
(DITRDCA)**

SMS Sender ID Registry

COMMUNICATIONS ALLIANCE SUBMISSION
MARCH 2024

Disclaimer

The views contained herein are general in their nature and attributable to a subset of members of CA. There are likely to be conflicting views on the appropriate way forward for these measures and these views will be addressed in separate organisational submissions. CA are keen to engage further on this topic as the process continues within the ACMA and DITRDCA.

About Communications Alliance

Communications Alliance is the primary communications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including carriers, carriage and internet service providers, content providers, platform providers, equipment vendors, IT companies, consultants and business groups.

Its vision is to be the most influential association in Australian communications, co-operatively initiating programs that promote sustainable industry development, innovation and growth, while generating positive outcomes for customers and society.

The prime mission of Communications Alliance is to create a co-operative stakeholder environment that allows the industry to take the lead on initiatives which grow the Australian communications industry, enhance the connectivity of all Australians and foster the highest standards of business behaviour. For more details about Communications Alliance, see <http://www.commsalliance.com.au>.

INDUSTRY COMMENTS ON THE OVERARCHING SMS SENDER ID REGISTRY

Communications Alliance (CA) welcomes the opportunity to provide this submission in response to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA) consultation into the voluntary or mandatory status of an SMS Sender ID Registry (Registry). We look forward to future engagement in this area to ensure that development of any agreed system is robust, meets the needs and protections of consumers and one which is implementable by industry and workable from a process and business perspective.

As has been communicated previously, we and our members continuously engage in activities to reduce scam calls and SMS and share the Government's desire to address the growing threat of scams to Australian consumers and businesses. Various solutions have been and continue to be put in place by industry to assist in combatting the ever-evolving scourge of scams and to dissuade scammers from seeing Australia as an easy target. Industry members are supportive of measures which can complement the obligations which already exist in the *Reducing Scam Calls and Scam SM C661* Industry Code (**Scam Code**).

The introduction of a Registry is one that some members have been raising for quite some time, and many members and industry participants welcome this as an additional tool to discourage SMS scams from targeting Australian consumers and businesses. As the ACMA has only recently launched the pilot phase of the Registry, CA is concerned that the focus of this consultation is too narrow and that there is a significant lack of clarity and detail about important considerations relevant to the development of an effective and workable Registry. Whilst we note that whether the Registry is mandatory or voluntary will be an important question to ask down the track, it nonetheless seems a little premature to be seeking a view on this question before industry has:

1. reviewed the Scam Code following its second anniversary;
2. mapped out the impact and timing of the full suite of proposed anti-scam regulatory reform affecting the telecommunications industry and business more generally; and
3. tested the feasibility of models, requirements and rules of the Registry, expanded its use more broadly and evaluated the outcomes / or success of the pilot phase (which we note at this stage involves only MNOs and is not representative of industry more broadly).

CA members (carriers, CSPs, SMS Aggregators) have highlighted that at this stage they do not completely understand the final form the Registry might take or what exactly may be considered to be mandated here. Further discussion needs to be had between the various stakeholders on the technical design and details regarding how a Registry will be operationalised and scaled. Without knowing if the system is to be a centralised database, a whitelist approach, blacklist, first in best dressed alphanumeric register etc there are more questions than answers on many of the system requirements, than on how a Registry should operate down the track.

Concerns have also been raised at this stage in relation to other scam mitigation work going on, such as the Treasury/ DITRDCA consultation on a mandatory scam codes framework which CA engaged in and provided a submission on. There is uncertainty around what the outcome of this consultation may be, and therefore what difficulties could arise if there were to be parallel work obligations for a Framework and Registry. Many of the benefits from the establishment of the National Anti-Scam Center (NASC) are also yet to be fully realised. In addition, as noted above, we are conscious that the scheduled review of the Scam Code upon its second anniversary has not yet commenced. We would again like to raise the point that the consultation on a Framework and lessons learnt from the Register pilot phase should

be finalised before pushing ahead too quickly with what will be a costly and resource intensive system to build and maintain across industry.

The question of Voluntary vs Mandatory

There are differing views on the answer to the question posed and additionally these will be addressed in individual organisational submissions.

Generally, CA members see potential value in the Registry being made mandatory in the longer term, should relevant data and insights indicate it is necessary, and subject to successful design and piloting, but it may not be as simple as allocating a voluntary or mandatory status to the Registry from the very beginning. Apart from the concerns outlined above, it again comes down to how the Registry is built to determine what inclusion status is feasible.

Viewpoints posed by members include:

- Voluntary – The Registry should only be for sectors seen as scam predominant ones such as Government, financial institutions, large enterprise or brands which have already been subject to Sender ID impersonation scams.
- Voluntary initially, but with intentions to transition to mandatory in phases following collaboration with industry. This would give industry, ACMA, Govt. and organisations wanting to use alphanumeric sender IDs a chance to resolve issues which may arise and allow for system development and model refinement as phase outcomes are measured and technology and/or scammers evolve over time. This would also allow consumers and organisations to be educated about the Registry as it moves towards mandatory participation.
- Rather than a voluntary or mandatory system, develop a trusted source register which allows for industry participants to register as part of the 'ecosystem'. These providers would have a responsibility to 'know your customer' and correctly validate the user of a Sender ID. Anyone outside of the ecosystem, would not be trusted, and anyone found to be breaching the ecosystem obligations could have penalties applied against them.
- Mandatory – engage in an all-in mandatory system but one in which the rules of the system have already been established. Allow for sources to be validated and trusted but with an ability for various entities to make use of an alpha tag so as not to disadvantage smaller businesses. This differs from a register such as seen in Singapore where it is first in best dressed and may not be the most equitable.

Communications Alliance looks forward to continuing our engagement in this process with DITRDCA, the ACMA and other relevant stakeholders. CA and our members would welcome the chance to engage in the co-design of a Registry to ensure its outcomes are met and is successful in being an additional tool to protect Australian consumers and businesses from falling victim to scams.

For any questions relating to this submission please contact Craig Purdon on 02 9959 9111 or at c.purdon@commsalliance.com.au



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