

SMS Sender ID Registry Consultation  
Communications Services and Consumer Division  
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and the Arts  
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Thank you for the opportunity to provide input into this important cornerstone policy to disrupt scammers from deceiving customers and protect legitimate brands from impersonation.

Bendigo and Adelaide Bank is Australia's most trusted bank with more than 7,500 employees who support over 2.6 million customers around Australia to achieve their financial goals. Our Bank is an ASX100 listed company with assets under management of more than \$98 billion, a market capitalisation of over \$5 billion and more than 110,000 shareholders across Australia. Bendigo and Adelaide Bank Group is the corporate entity for three prominent brands; Bendigo Bank, Rural Bank and Up.

Alongside other exploitative practices, over the past few years, our Bank has continued to observe increasing instances of SMS sender impersonation scams due to the wide-spread availability of third-party tools and services that allow people to overlay alphanumeric tags on SMS communications. These tags have been used to impersonate legitimate brands and place our customers at risk of being victim to financial scams, identity theft and social engineering scams as well potentially unknowingly spreading harmful malware.

Our Bank recognises the ongoing challenge posed by scams and has engaged a host of measures to reduce incidences of our customers falling victim. This includes the introduction of multi-factor authentication, blocking high risk cryptocurrency transactions, significantly increasing the size of our fraud prevention and response team and the removal of links in SMS messages from the Bank to keep our customers safe.

Further to this, our Bank works to improve digital literacy rates to build a safer online community. The Banking Safely Online program enables one-on-one connections between our Bank and our customers. These sessions have attracted more than 1,000 participants so far, including customers from across our 430 branches and members from over a dozen community groups. We have also partnered with the Good Things Foundation to deliver programs in partnership with 50 branches across our network connect that teach customers and non-customers how to confidently use their digital devices.

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Nevertheless, cyber fraud remains to be a complex and growing issue that will require a consistent and collaborative effort from government, regulators, law enforcement, industry, and consumers. Our Bank has been working closely with our industry representatives and telecommunications companies to implement a range of measures, including the SMS Sender ID Registry (the Registry). We strongly believe the Registry can help in drastically reducing instances of spoofing scams, whilst increasing customer confidence and promoting public trust.

We strongly support the adoption of the Singapore Sender ID approach as the best way to safeguard against scammers finding vulnerabilities and exploiting the Registry. In our view, the success of the scheme will be determined by the widespread take-up of the Registry, and therefore, to maximise success, the Registry should be mandatory for all businesses across all sectors who are sending SMS communications to their customers. Not only would this facilitate a consistent approach across all sectors in the economy but work to build and promote public trust and confidence in SMS communications. In contrast, a voluntary approach would continue to leave customers vulnerable to scams and erode consumer trust by placing an unfair burden on consumers to decipher if a branded SMS is legitimate or not.

It is anticipated that the Registry will incur a fee to reflect the ongoing maintenance of the Registry. These fees should only reflect the administrative and operational costs needed for the upkeep of the Registry, as well as any compliance monitoring. It is our view that a mandatory model will ensure that fees are kept low by utilising a large user base to maximise the cost-sharing of the Registry.

Alongside implementing a mandatory scheme, the Registry and the Registry's blocklist should be publicly available on the Australian Communications and Media Authority's website. Consumers should be able to search the Registry to confirm Sender IDs with legitimate businesses, assuring transparency of the scheme and deepening customer confidence.

Further, in terms of transition timeframes, we urge the government to consider a swift implementation of this measure. It is important the Registry is implemented as soon as possible to secure the safety of consumers online.

We look forward to continuing to work with the government on this important anti-scam measure as it continues to progress through to implementation.

Yours sincerely,



**CEO and Managing Director**