

20 March 2024

Department of Infrastructure, Transport,
Regional Development, Communications, and the Arts
Submitted via email: SMSSenderID@infrastructure.gov.au

Response to SMS Sender ID Registry

Australia Post appreciates the opportunity to make a submission in response to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA) consultation on the SMS Sender ID Registry consultation.

Australia Post supports models to reduce the risk from SMS scams originating from what appear to be legitimate Sender IDs. The community has the right to feel safe with information they receive from trusted brand, like Australia Post. Our position as a trusted national brand makes us a prime target for scammers using fake parcel delivery SMS to request financial and personal information from Australian consumers.

We are committed to consumer protection and invest in technology and solutions to help mitigate the risk of cyber threats and scams. We continuously monitor and deactivate fraudulent websites associated with these scams and provide awareness to our customers and consumers via our social media channels and website.

While educational materials are one part of the efforts to minimise scams, it relies on the consumer knowing to seek out the information, and what information they can trust on the internet. As scammers get more sophisticated, this can be a difficult task, as scams increasingly appear in Australians' regular channels of communication (such as SMS chains).

As the Government invests in an ambitious 2023-2030 Cyber Security Strategy and develops a digital identity framework to support a digital economy with minimised data retention needs, consumers will increasingly use mobile apps as a secure solution. But there will continue to be a role in this digital transition for a range of engagement solutions, including apps, emails, and SMS.

As such, we support a pragmatic approach to SMS fraud that is not unnecessarily burdensome but will achieve the intended outcome. This recognises the likely reduction in SMS utilisation and investment in the future, and ensures that all businesses have an opportunity to engage with customers in a way that suits their business needs. The model should allow flexibility for



businesses to move SMS services between telcos and service providers whilst still maintaining SMS protections.

In principle, Australia Post supports a mandatory model, for its ability to drive consumer confidence, awareness and consistency of messaging. However, if the Government pursues a mandatory scheme, further consultation on the details of the model and associated costs will be critical. From Australia Post's perspective, it is important that any model can underpin the necessary flexibility referred to in the paragraph above, reflecting different business approaches to customer engagement.

Without this, there may be a risk that some businesses are excluded from some forms of customer engagement due to regulatory costs. Given the characteristics of a mandatory model are likely to be simplified and more automated for telecommunication providers, a simple flat annual fee under the Australian Government Cost Recovery Policy should remain relatively low.

Finally, from a practical perspective, we suggest a secure user interface that provides a centralised and up-to-date view of company details and Sender IDs. The platform should allow for information to be disseminated to all telecommunication companies in a timely and automated manner. In addition to the telecommunications companies having the primary obligation to enforce by way of blocking, it would assist businesses if there was a feedback mechanism from the telecommunication companies where there has been an attempt to utilise the registered SMS ID. This would allow companies to identify potential related threat actors across different channels (including email or websites) and support a coordinated response.

To discuss this feedback in more detail, please contact [REDACTED] Head of Industry, Policy, and Regulatory Affairs at [REDACTED] or on [REDACTED].