

Commpete input to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts Consultation on SMS Sender ID Registry - Fighting SMS Impersonation Scams

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Via email: SMSSenderID@infrastructure.gov.au

Thank you for the opportunity to comment on the *Consultation Paper: Fighting Scams - What type of SMS sender ID registry should be introduced in Australia?* We acknowledge the Government's initiative to address the growing issue of SMS impersonation scams as an essential step towards enhancing consumer trust and security within the telecommunications sector.

Commpete, an industry alliance representing non-dominant digital communication providers, is supportive of a mandatory registration model for alphanumeric sender IDs, and would like to make the following comments:

- **Scam prevention:** Commpete is strongly in support of stopping and disrupting scam SMS. We would like to highlight that the disruption of traffic should not have an impact to legitimate traffic, such as A2P SMS. A mandatory registry could significantly enhance the level of protection available to consumers, including the customers of smaller providers. It should also seek to reduce complexity for those providing and using A2P SMS legitimately. The positive outcomes observed from the Singapore Sender ID Registry experience provide encouraging evidence for the potential effectiveness of a similar approach in Australia.
- **Operational simplicity:** A mandatory framework provides a clear and uniform set of rules for all providers, potentially simplifying compliance and enforcement processes. This may be particularly beneficial for smaller providers, which may lack the extensive resources of larger operators to manage complex regulatory environments.
- **Consumer and business protection:** Given that scams disproportionately impact vulnerable populations and can cause significant reputational damage to businesses, a mandatory registry of legitimate alphanumeric sender IDs and in tandem with legitimate calls to action (CTA's) aligns with consumer protection principles and supports the interests of legitimate businesses. A mandatory registry of both also ensures all consumers are protected uniformly, closing gaps that might be exploited under a voluntary system.
- **Clarity of obligations:** A clear demarcation of the responsibilities of providers, distinct from the operational duties of the Registry and other stakeholders, is essential. This clarity will help smaller providers efficiently allocate resources to comply with regulatory requirements.
- **Handling of unregistered IDs:** We note that marking SMS's as potential scams rather than outright blocking could have an educational purpose, aiding consumers in recognising scam messages, which is beneficial from a public awareness perspective.
- As we move forward, it's essential to carefully consider the transition arrangements for providers and ensure that the registry's implementation is both practical and

sustainable, particularly for smaller operators. We support drawing from Singapore’s experience, including its roll-out of the mandatory SMS Sender ID registry. In particular, we note that the Singapore government provided organisations with a 3-month notice period during which they could reserve Sender IDs on a first-come-first-serve basis at no cost. Following this, unregistered Sender IDs were marked with a “Likely-Scam” header for a 6-month transition period, providing businesses with ample time to comply and ensure their legitimate messages were not flag as scam while encouraging customers to approach their SMSes with caution.

- We also recommend the roll-out of any mandatory SMS Sender ID Registry be accompanied with extensive public messaging to ensure widespread awareness and education of the changes and how to handled messages that are flagged as likely to be scam.

We eagerly await further details on the voluntary pilot outcomes, cost considerations, and operational requirements of the proposed registry models. Our primary aim is to support measures that enhance consumer protection against scams while ensuring that regulatory frameworks remain accessible and sustainable for small telecommunications providers.

Commpete advocates open access regimes, the ability for new entrants to both enter and thrive and diversity in the industry of both large and small providers. We welcome the opportunity to discuss this matter with the Department at a convenient time once they have viewed our response.

