I am the owner, director, and CEO of SMS SOLUTIONS – a small SMS Aggregator based in Melbourne.

We send approximately 700,000 SMS messages per month. We operate a small, personalised service and interview ALL our clients prior to allowing them access to our service. Potential scam senders do not get access to our system. We have not, so far, had any issue with bulk scam SMS's being sent through our platform. We have been operating for 17 years.

We are supportive of a Mandatory Registration system; however, we have MANY small SME clients and any additional costs will be an issue for them – particularly a set-up fee of as much as $500 plus annual charges.

Malicious use of 'Fake' Sender IDs on text messages is clearly a very serious problem.

On the other hand, the 'correct' use of Sender ID's is a positive benefit for the industry, as it should allow people to have confidence in who sent the message.

While it is clear that the current system of Sender ID's is vulnerable to Scammers, the system is also very helpful to consumers *when it is used properly*.

The fact that a small business can send a SMS message including their sender ID (usually their company name) increases the consumer confidence in that SMS message and therefore its effectiveness.

Excluding **small businesses** from utilising Sender ID's by adding significant costs will, we believe, be detrimental overall.

An additional cost of $500+ added to the set-up costs for a small business will be a material barrier for many of our clients.

Our suggestion would be that there could be two levels of costs: one for businesses planning to send larger quantities (perhaps, in excess of 10,000 messages per month??) and another, lower cost for businesses forecasting to send smaller quantities of SMSs per month.

On a technical matter:

The Consultation Paper mentions "*If the alphanumeric sender ID is listed but **the number used to send** the message is not listed, messages could be blocked…*".

My understanding is that currently if we use an alphanumeric sender ID then that ID **replaces** the sender number information which would 'normally' be sent with the SMS 'push' to the Australian Telcos.

It is not clear to us HOW the "number used" to send the message will be checked, since there is currently NO "number" information provided if an Alphanumeric ID *replaces it*.

If an alphanumeric Sender ID is used in the 'push' then there is no additional 'sender number' sent at the same time, The 'alphanumeric sender ID' REPLACES the 'Sender Number' in the data sent to the Telcos. To change this system would potentially require some significant technical changes to be implemented – certainly, this may impact the timing of any implementation. This is true regardless of whether a Voluntary or Mandatory system is adopted.

Thanks & Regards,