

19 March 2024

SMS Sender ID Registry Consultation
Communications Services and Consumer Division
Department of Infrastructure, Transport, Regional Development,
Communications and the Arts
GPO Box 594
Canberra ACT 2601

By email to: SMSsenderID@infrastructure.gov.au

Dear Communications Services and Consumer Division,

Fighting SMS Scams – What type of SMS sender ID registry should be introduced in Australia?

Thank you for the opportunity to provide feedback to the Department of Infrastructure, Transport, Regional Development, Communications and the Art's consultation on what type of SMS sender ID registry should be introduced in Australia.

The Telecommunications Industry Ombudsman has jurisdiction to handle complaints about phone and internet services. We can handle a complaint about a scam if part of the complaint relates to the actions (or inaction) of a telco provider who is a member of our scheme. This includes complaints about number spoofing.¹ We may consider a telco's compliance with the *Reducing Scam Calls and Scam SMS Code* when determining how a complaint should be resolved.

We support the introduction of a mandatory registration model. A mandatory registry would ensure consumers receive a greater level of protection from scammers impersonating legitimate brands. A voluntary requirement may create inconsistency and confusion for consumers as they may not be aware which businesses and entities have registered their sender ID and which have not. A voluntary model could also be exploited by scammers attempting to use variations of legitimate brand names to trick consumers into thinking they are interacting with the legitimate brand who has registered their alphanumeric sender ID.

¹ Number spoofing operates by transmitting a false caller ID and by sending SMS or making calls to a consumer that appear to be from the actual phone number of a well-known brand the scammer is pretending to represent.

Any obligations that are introduced which require telco providers to comply with in the registry should be clear, readily enforceable by the Australian Communications and Media Authority, and provide clear consequences for non-compliance by telco providers.

We look forward to the outcome of this consultation.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Cynthia Gebert', followed by a long, sweeping horizontal flourish.

Cynthia Gebert
Telecommunications Industry Ombudsman