



Submission in response to the
Communications Alliance public
comment draft

Industry Code DR C661:2022

**Reducing Scam Calls and
Scam SMSs.**

11 March 2022

PUBLIC VERSION

Introduction

Optus appreciates the opportunity to respond to the public comment draft of the Communications Alliance (CA) Industry Code DR C661:2022 Reducing Scam Calls and Scam SMSs.

Optus is a Member of Communications Alliance and participated in the WC92 *Reducing Scam Calls and Scam SMSs* Working Committee, which has developed this Industry Code and Industry Guideline.

While supporting the expansion of the existing Reducing Scam Calls Industry Code to include Scam SMS, Optus provides further input on areas that require changes in the Draft Code.

Comments on the Draft Code:

Section 2.2

The definition of “International Mobile Equipment Identity” & “PEI” should reference AS/CA S042.1:2022 which has been published by CA on 8/3/2022. Also, Section 2.2 should expand the acronym “PEI” to “Permanent Equipment Identifier” as the use of “PEI” acronym is only relevant to Section 2.1.

Scam Calls

Improving CLI Accuracy

Clause	Changes	Comments
4.2.1	<p>Domestically Originated Calls</p> <p>4.2.1 Originating C/CSPs must only originate calls on their Telecommunications Network with CLIs in accordance with the Numbering Plan, using the number or number ranges that are:</p> <ul style="list-style-type: none">a) allocated directly to the Originating C/CSP by the ACMA; orb) transferred to them or made available for use via a 3rd party C/CSP contractual relationship with the C/CSP which holds the number or number ranges; orc) ported in from another C/CSP; ord) allocated to an entity the Originating C/CSP has a domestic or international roaming agreement with; ore) Option 1: issued to the A-Party caller by the Originating C/CSP. <p>Option 2: issued to the A-Party caller by any C/CSP.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"><p>DRAFTING NOTE: Comment is invited on the alternate versions of drafting for clause 4.2.1 (e) above.</p></div>	Optus supports Option 1.

Scam SMS

Improving Public Number and Alphanumeric Sender ID accuracy

5.2.1	<p>Originating C/CSPs must only originate SMs on their Telecommunications Network with a Public Number in accordance with the Numbering Plan, using the numbers or number ranges that are:</p> <ul style="list-style-type: none">a) allocated directly to the Originating C/CSP by the ACMA; orb) transferred to them or made available for use via a 3rd party C/CSP contractual relationship with the C/CSP which holds the number or number ranges; orc) ported in from another C/CSP; ord) allocated to an entity the Originating C/CSP has a domestic or international roaming agreement with; ore) Option 1: issued to the A-Party by the Originating C/CSP. Option 2: issued to the A-Party by any C/CSP. <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"><p><i>DRAFTING NOTE: Comment is invited on the alternate versions of drafting for clause 5.2.1 (e) above.</i></p></div>	Optus supports Option 1.
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Section 8 (References)

Replace the current reference to AS/CA S042.1:2020 by AS/CA S042.1:2022 which has been published by CA on 8/3/2022.