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Submission 8 March 2024

Craig Purdon
Project Manager
Communications Alliance
Level 12/75 Miller Street
North Sydney NSW 2060

Re: C570:2024 Mobile Number Portability

Dear Mr Purdon,

The Australian Communications Consumer Action Network (**ACCAN**) thanks Communications Alliance for the opportunity to provide feedback on *C570:2024 Mobile Number Portability* (**the Code**).

ACCAN is the peak body that represents consumers on communications issues including telecommunications, broadband, and emerging new services. ACCAN provides a strong unified voice to industry and government as consumers work towards communications services that are trusted, inclusive and available for all.

ACCAN considers the current Code to be largely meeting its intended objectives: providing guidance for industry and providing appropriate consumer protections.

We consider that the success of the Code merits a review of the performance levels outlined in section 3.5 to reflect advances in technology and business processes.

While the industry has taken steps towards reducing unauthorised number transfers, unauthorised porting and theft of numbers still occurs. Mobile numbers are one of the backbones of authorisation and two-factor authentication for consumers and unauthorised transfers can do significant economic and social harms to individuals and society. ACCAN urges the industry to continue to pursue any opportunities to reduce harms from unauthorised number transfers.

We thank Communications Alliance for the opportunity to provide comments on the Code. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact me at <a href="mailto:samuel.kininmonth@accan.org.au">samuel.kininmonth@accan.org.au</a>.

Yours sincerely,

Samuel Kininmonth Policy Adviser



The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers.