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Submission

11 May 2023

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

Re: C570:2009 Mobile Number Portability

Dear Mr Purdon,

The Australian Communications Consumer Action Network (**ACCAN**) thanks Communications Alliance for the opportunity to provide feedback on *C570:2009 Mobile Number Portability* (**the Code**).¹

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 meeting its intended objectives: providing guidance for industry and providing consumer protection.

Given the success of the code to date, we suggest a review of the performance levels outlined in section 3.6 of the Code in the future as technology allows.

While the industry has taken steps towards reducing unauthorised number transfers, unauthorised porting and theft of numbers still occurs. Mobile numbers are the backbone to much 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.

Please do not hesitate to get in touch if you wish to discuss our feedback further.

Sincerely,

Samuel Kininmonth

¹ Communications Alliance, 2023. *C570:2009 Mobile Number Portability*. Available at: <u>https://www.commsalliance.com.au/Documents/all/codes/c570</u>

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.