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PIVOTEL COMMENTS ON DR C555:2023 INTEGRATED PUBLIC NUMBER DATABASE (IPND) INDUSTRY CODE

Pivotel would like to make the following comments in relation to the Integrated Public Number Database (IPND) Code ([DR C555:2023](#)) request for public comments:

1. Page 9: Definition of Customer. Currently, Customer "means a consumer who has entered into a customer contract with a CSP and has been Issued a Number". The key parts of this definition that help define who a customer is, is whether the consumer is issued a Number (as it is defined) and whether it is issued by a Carriage Service Provider (CSP).
 - a) In simple terms, this means the supply of a fixed, mobile or satellite service, carrying voice or data, with at least one end of the call located within Australia, is a carriage service, and a person supplying such a service is a CSP, and if a number has been issued to a person for that service, then that person is a Customer.
 - b) What is not clear is, who is the Customer when it is the supply of a carriage service, associated with an alarm or IOT monitoring service, that has a number associated with it. i.e. Is the security or monitoring company the customer, or is it the end user to whom the alarm or monitoring service is provided, and is the IPND address then the address of the end user?
 - c) It would be helpful for the IPND Code to be clear about this circumstance. The Code currently makes it clear that an internet service provider is a CSP (see definition of CSP), so the existence of a voice capability is not a requirement. It is not uncommon for an end user to have a data service (including mobile data) dedicated for alarm monitoring, where the end user buys the carriage service separately from the monitoring service – in such an instance the end user would be the customer.
 - d) The Code also makes it clear that a VoIP service provider is a CSP (see definition of CSP). What is not clear is whether an SMS application provider, capable of sending and receiving SMS messages via a number, is a CSP, and who is the Customer in the context of the issued number. i.e. Is the application provider, or the end user of the application, the Customer for the purposes of the IPND?
2. Page 15: Drafting note seeks specific comment on whether International Numbers should be included in the IPND. Pivotel's view is international numbers should be included in the IPND when they are used domestically on a long-term basis i.e. not a roaming service. International numbers associated with satellite services are a common example of numbers used domestically by Customers on a long-term basis.
3. Page 28: Section 4.2.31 (a) and (b) are somewhat contradictory. Under (b), a CSP can be identified as the Customer when the standard telephone service is temporary, with no time limits, when the CSP does **not** have in place arrangements enabling queries from ESOs.

Under (a), if the CSP has in place arrangements enabling queries from ESOs then the length of time of time is limited to 30 days for when the CSP can be identified as the Customer. Under such rules, it is more likely CSPs will avoid putting in place arrangements with ESOs which is clearly not the intent of this section.

4. Page 29: Section 4.2.32 requires Customers who make numbers available (with a carriage service) to third parties on a short-term basis to have their details entered in the IPND. This would appear to include customers who provide rental services for phones and resell the carriage service for the period of the rental.

If this is the intent, then “short-term basis” needs to be defined. E.g. Limited to 30 days or less.

In our view, businesses that sell phone rental services and resell the associated carriage services should also be captured as CSPs under the Telecommunications Act, and end users receiving rental and carriage services for a limited period of time, but greater than say 30days, should have the end users details included in the IPND. Clarity on this issue should be provided under the code.

Yours sincerely



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