

## Soprano's response to Industry Code DR C661:2022: Reducing scam calls and scam SMS

Soprano Design Limited (Soprano) appreciates the opportunity to respond specifically to the options presented in clause 5.2.1(e).

Soprano is an award-winning global communications software solution provider founded in 1994 in Sydney, Australia. Soprano's powerful digital transformation omni-channel Communications Platform as a Service solution, Soprano Connect, supports over 3,500 enterprise and government customers including some of the best-known names globally in banking, retail and healthcare.

Our enterprise and government customers on four continents trust us to send over 10 billion SMS messages via our platform to their own consumers, employees, patients and citizens every year. A key part of this trust is ensuring that we deliver on reliability and security.

For reliability, we need to have the capability for messaging failover via other routes where our preferred C/CSP suffers an outage or other technical issue. Where a carrier only transmits SMS using the numbers issued by that carrier (Option 1), we would not have any ability to easily switch routes, leading to degraded reliability.

For security, as part of our ISO27001:2013 certified ISMS, we keep detailed logs that identify which of our customer's users have sent messages via our platform. We are able to meet any reasonable law enforcement request or traceability requirements, and we have not been aware of any issue of enforcement agencies finding it hard to identify calls being originated from our platform. We do not believe that the restrictions imposed by Option 1 are justifiable on the basis of the C/CPS's needs to meet obligations to intercept block and/or traceback.

More broadly, for a business such as Soprano, Option 1 would increase the cost and complexity of switching carriers and reduce carrier competition.

We are not in favour of any proposal to limit our customer's ability to send legitimate communications, reduce the reliability of services or reduce competition. Option 1 would materially impact our business and degrade our ability to provide the messaging services that our customers value.

For these reasons, we strongly support Option 2 being adopted for clause 5.2.1(e) in the code.

Yours faithfully



Richard Favero  
Executive Chairman and founder






# Soprano Submission DR C661\_2022

Final Audit Report

2022-03-14

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