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WC92
Communications Alliance

Re: C661 Review

Dear WC92 Members:

Thank you for the opportunity to provide feedback to the revised Reducing Scam Calls Code (C661). We are responding with a view on the options for use of Australian telephone numbers (TNs) as outlined in the Code and a request for clarification. The views expressed are specific to the Australia market and its regulatory regime and should not be considered as an expression of the views of Verizon in other jurisdictions where the market and regulatory environments may differ from those of Australia.

Option for TN Usage

The essential issue contained in the options is the ability of the A Party to use in respect of which they are the Rights of Use (ROU) holder as a presentation or call back TN in respect of both domestic and international inbound calling, regardless of the network used for the origination of such calls.

We submit that an A Party should have the ability to present TNs (in respect of which they are the ROU holder) in conjunction with calls originated on a network other than that of the issuer of the TN to the A Party provided there is an underlying valid use case. I note that this ability is available in many jurisdictions.

To support this ability in the Code in respect of domestic calling Option 2 in Clause 4.2 would be required to be retained. In respect of International Inbound Calls this would need to be recognised as a valid exception. This exception could fall into the ones listed in the Guideline for call centres or the use of Unified Communications in respect of Clause 4.2.6. Regulations should allow for flexible, innovation-friendly and technology-neutral rules to minimize disruptions to legitimate business use cases for enterprise customers, such as international call centres.

From the Verizon perspective it is very common for our multinational customers to acquire services from us globally in respect of certain parts of their business (such as their private global corporate network, call centre services or unified communication platforms relating to their call centres) which are targeted at supporting their global footprint, while relying on local providers for others – such as PSTN voice service. Verizon in Australia does not in any real sense compete in the local voice market. While Verizon does have a TDM switch in Sydney and provides a SIP Trunking service in Australia we do not have any significant local voice only business. As such our multinational customers may use Telstra (or other local provider) as their local voice provider in Australia and use Verizon for other services that are common to their global footprint such as Unified Comms.

While these customers do not wish to partner with Verizon for PSTN voice services in Australia, they do expect the flexibility to be able to use numbers associated with their Australia presence for all legitimate business purposes, here as they can in other jurisdictions.

In the Verizon experience it is very likely / common that these multinationals will have a model where they run a call centre or platform:

- (a) in one country and want to present the local TNs of another country when they are calling parties in that country;
- (b) Or in one CCA of Australia and they want to present a local call back TN when they are calling parties in another CCA.

There are many use cases that are supported by this model the chief aim of which is to ensure called parties will not ignore the call (because it comes from abroad) or can call back a national number for further interaction such as:

- Centralised Telemarketing Agency based in Sydney but needs to present a local TN for Perth for call back purposes – this becomes more prominent with the outright ban on using 13/1800 TNs as presentation CLIs;
- The inbound pharmacy order centre needs to present a local store number when contacting customers with info about order status;
- Customer banking firm needs to display main TN which has not been ported to Verizon;
- Customer Specialised Service Provider needs to ensure that the call back will be directed to experts/specialists located in Australia to ensure enquiries are directed to the right place quickly and conveniently
- Customer located in Australia may use a Virtual Contact Centre platform (VCC) located outside of Australia which platform underpins the ability of the Customer to operate its call centres globally including Australia. When making calls locally they wish to use the TN provided to them by their local provider in Australia for call back purposes, as well as indicating correctly that this caller sits in Australia.. However the VCC architecture is such that all calls whether bound internationally or domestically will originate outside of Australia. The call will appear as an inbound international call.

It should also be noted that it is not Verizon that inserts the presentation CLI in these cases at the network level. Rather the presentation CLI is inserted at the application/platform level. Unified Communication platforms, Call Centre technology and Session Border Controllers all provide the customer with the ability to present the TN of their choice with respect to calls made.

The rights of use of the TN here are covered by contract where the customer is contractually required to ensure the number is genuine, they have the right to use it and that it will be answered if the called party does indeed use the number for this purpose.

It is clear these scenarios are being examined in many jurisdictions and each jurisdiction is employing methods that they see as effective to address the issue while recognising the valid ways of conducting business in the digital world. Generally speaking regulators recognise that while an inbound international call with a TN local to the number that it is inbound to is one indicia of scam calling and spoofing this was a very rebuttable presumption. In Australia the underlying approach is exactly the same – that is the indicia of scam calls in many cases coincide with valid use cases. The difference in Australia hinges on the rights of use issue and whether a TN that an enterprise has a right of use over may use it as a presentation CLI over another carrier's network (to the carrier that issued the number to the enterprise and whom they employ for local voice services in Australia).

It is useful to note that although the network in this region cannot support a network and presentation CLI (as for example can be supported in the UK and other countries) it remains true that Verizon in all these use cases can, if asked, provide the details of the origination of the call and identify, as required by law, the details of our customer.

Without this flexibility the ability of global providers to compete in the Australian market and offer advanced communications solutions that benefit business and their users will be diminished. These enterprises are very happy with their local providers. The TNs used by them for these purposes are usually well established and are not single purpose. In other words these TNs will be associated with their advertised facilities in Australia. In addition these non-local call centres are not just servicing Australia. They are global facilities serving the customer's global footprint. This customer wants to continue its local relationship for local purposes while having the flexibility to utilise Verizon's global presence for supporting the global reach of its call centre – including to Australia.

The Verizon value proposition is the relative simplicity of this call centre support – in that you can think globally while acting locally. To the extent this is no longer possible the lack of availability of this model for Verizon would expect to impact on its continued offering of this service to customers operating in Australia. Regulators should carefully balance consumer protection and the needs of legitimate businesses to reach their customers globally with innovative services that improve the user experience.

Clarification

Clause 4.2.8 of the Code prohibits the transmission of calls where the CLI provided is 13/1300/1800/1900.

When consulting with our Operations team they wish to validate their assumption in respect of inbound international calls that this refers to AU issued numbers in an E.164 format.

Yours sincerely,



MJ Salier
Verizon Australia Pty Limited

