

20 March 2023

Communications Alliance
PO Box 444
Milsons Point NSW 1566

Submitted online at <https://commsalliance.com.au/Documents/Documents-under-Review/submit-comments> and by email to c.purdon@commsalliance.com.au

Dear Communications Alliance,

G651:2017 Customer Authorisation Industry Guideline review

Thank you for the opportunity to comment on Communications Alliance's scheduled review of the *Customer Authorisation Industry Guideline* (the **Guideline**).

We support the continued operation of the Guideline to help protect consumers from unauthorised transfers. As we become more reliant on our mobile phones to participate online and to verify our identity through multifactor authentication, it is critical there are protections in place to ensure providers are dealing with the right person.

Complaints about mobile based fraud

The Guideline continues to play an important role in preventing unauthorised transfers resulting from fraud.

We receive complaints from consumers who tell us they have been a victim of mobile based fraud, including SIM swaps. When a consumer has their mobile number stolen, the detriment they experience can be severe.

Our systemic investigation report [Defending phone and internet accounts from fraudsters](#) found weak security processes can help fraudsters gain access to telco accounts. Fraudsters continue to evolve the methods they use to gain control of a consumer's mobile number.

A consumer's mobile number is a valuable target for fraudsters because mobile numbers often play a vital security role when logging into or resetting passwords. This is not just for telco accounts, but also banking and finance accounts, social media accounts, web and email accounts, and government services.

New rules to prevent unauthorised transfers

Communications Alliance should consider revising the Guideline to incorporate (or make reference to) related rules that have come into effect since the Guideline was last updated in 2017.

These new rules include the *Telecommunications (Mobile Number Pre-porting Additional Identify Verification) Industry Standard 2020*, the *Existing Customer Authentication Industry Code (2021)*, and the *Telecommunications Service Provider (Customer Identity Authentication) Determination 2022*.

Since the introduction of above rules, the number of complaints we receive about unauthorised transfers has decreased. However, smaller providers or franchises that resell telco products may find it difficult to navigate the current suit of rules regarding customer authorisations and transfers.

There is benefit in consolidating all the rules in one document to make it easier for all telcos to understand and comply with their obligations.

We look forward to the outcome of Communication Alliance's review of the Guideline.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Cynthia Gebert', followed by a long, horizontal flourish that ends in a small upward tick.

Cynthia Gebert,
Telecommunications Industry Ombudsman