

19 January 2011

**Manager  
Numbering Project**  
Australian Communications and Media Authority  
PO Box 13112  
Law Courts  
Melbourne, Victoria, 8010

By e-mail  
numbering.project@acma.gov.au



Dear Sir/Madam,

**Subject: Structure of Australia's telephone numbering plan**

Thank you for providing industry with the opportunity to comment on the ACMA Consultation Paper Number One – Numbering: structure of Australia's telephone numbering plan.

We offer the attached brief Position Paper in the debate as an indication of the views of our members.

The Position Paper has been jointly prepared by industry through the combined auspices of the Australian Mobile Telecommunications Association and Communications Alliance

Yours sincerely,

John Stanton  
**Chief Executive Officer**

Encl.

- Position Paper by AMTA and Communications Alliance to the ACMA Consultation Paper Number One – Numbering: structure of Australia's telephone numbering plan.

**COMMUNICATIONS  
ALLIANCE LTD**

Level 9  
32 Walker Street  
North Sydney  
NSW 2060 Australia

P.O.Box 444  
Milsons Point  
NSW 1565

T 61 2 9959 9111  
F 61 2 9954 6136  
TTY 61 2 9923 1911  
[www.commsalliance.com.au](http://www.commsalliance.com.au)  
ABN 56 078 026 507

# COMMUNICATIONS ALLIANCE & AMTA

## Position Paper

### Structure of Australia's telephone numbering plan

December 2010

Communications Alliance, the Australian Mobile Telecommunications Association and their members generally support an analysis of the current and future needs of numbering and of their potential implications for numbering arrangements, understanding the emerging NBN and IP environment will change the way telecommunications services are provided.

In assessing those needs and their implications, consideration ought to be given to the following:

- o potential impacts on consumers and how they use numbers with existing services;
- o potential industry impacts including investments made by the telecommunication industry in giving effect to current numbering arrangements and the costs associated with any potential changes;
- o developing a sound strategy for transition, including careful consideration of implications for other instruments as a result of potential changes;
- o achieving a smooth migration to any potential new numbering arrangements to balance the desire for efficiency and competition with the necessity of minimising consumer and industry disruption;
- o continuing support for existing services developed under existing numbering rules;
- o providing carriers/carrier service providers with certainty in respect to existing products and services while allowing for flexibility and the ability to innovate in the development and supply of new services;
- o ensuring there is an adequate supply of numbers;
- o supporting the telecommunications industry to move to a national broadband network; and
- o recognising the existence of a range of other telecommunication policies and obligations directly related to numbering arrangements that need to be reviewed, and in some cases removed before any new

numbering arrangements are put into place that may be subject to current legislation.

Industry would equally welcome early discussion of the general purpose of the numbering plan and the future role of stakeholder involvement in its review, including how to address policy matters as part of the review process.

Industry will continue to engage constructively with the ACMA and all other stakeholders to further develop the Australian telecommunications environment.