



17 September 2021

**VIA EMAIL**

Communications Alliance  
Level 12, 75 Miller Street  
North Sydney  
NSW 2060

**RE: COMMENTS TO C666:2021 EXISTING CUSTOMER AUTHENTICATION**

Dear Communications Alliance (“CA”),

RingCentral appreciates the opportunity to provide its comments to the new Industry Code C666:2021 *Existing Customer Authentication* (the “**New Code**”).

RingCentral is a global leader in the provision of business integrated communications and collaboration solutions over the cloud. We provide unified voice, video, team messaging and collaboration, online meeting services, and digital customer engagement, and integrated contact center solutions to multinational business customers.

RingCentral appreciates CA’s general approach to customer authentication in the New Code, which effectively balances customer account security with the need to minimize complexity and over-prescriptiveness.

Outbound Communications - RingCentral agrees that high-risk transactions should not be transacted over outbound communications by service providers, since in this scenario both the called party (customer) and the caller (service provider) would have to authenticate themselves. Unless a practical approach for simultaneous authentication can be developed, the need for authentication at both ends means that one party has to be authenticated before the other. Since the protection of the customer’s information is paramount, the service provider must authenticate itself first. We note that CA’s proposal is aligned with international practice; for example, the United States has addressed this concern by allowing providers to disclose call detail or account information over the telephone only for customer-initiated contact, where the customer supplies a password.

Sincerely,

RingCentral Australia Pty Ltd

Director – APAC Corporate Counsel  
RingCentral, Inc.