

## ACMA Consultation Paper

### Numbering variation 2012—understanding its effect on numbering

#### Providing long-term certainty for mobile and geographic number supply and greater flexibility for geographic numbers

#### Communications Alliance Submission

##### Executive Summary

Industry is pleased to have the opportunity to comment on the “**Numbering variation 2012—understanding its effect on numbering**” paper released by the ACMA in December 2011.

Industry is generally supportive of the Numbering Plan amendments proposed by the ACMA but, as outlined below, does have some concerns about aspects of the recommendation to supplement the supply of digital mobile numbers.

##### 1. Supplementation of digital mobile numbers

*The Number run-out analysis conducted by the ACMA shows that, if CSPs continue to apply for mobile numbers at the rate seen in the 18 months to mid 2011, the remaining supply of mobile numbers could be exhausted by as early as 2017. The ACMA proposes to supplement the existing supply of mobile numbers by specifying a new number prefix for mobiles—05. The '05' number range will provide a supply of 100 million 10-digit numbers. The new numbers would only be available for administrative allocation by the ACMA to CSPs once the existing supply of '04' numbers is exhausted.*

Industry proposes that the ACMA should delay any specification of additional number ranges until the existing supply of '04' numbers is closer to being exhausted.

In particular, Industry is concerned that the ACMA proposal to use the '05' range has the potential to cause confusion for customers if the call charges to '05' Location Independent Communications Services (LICS) are different to '05' (Mobiles). We note that although some LICS numbers have been allocated, none are currently in use. In addition, geographic numbers are used today for such services. Industry proposes that the ACMA undertake a review of the LICs before any decision is made to use the '05' range for mobile numbers and that if the decision is to use that range, that it only be used if LICs are removed.

Noting that the second section of the ACMA's paper proposes supplementing geographic numbers for the next 20 years without a need to use either the 06 or 09 number ranges, Industry suggests that if a second range is in fact required for mobiles, when that time arises, that a range other than the '05' range be considered if LICs remain in use. A suggested trigger point is to consider supplementing number ranges available for mobile services when the existing supply of mobile numbers reaches 80%.

## **2. Supplementation of geographic numbers**

*Run-out analysis for geographic numbers across Australia shows that the current supply, in several areas, will not be sufficient to meet predicted long-term (20-year) demand for customers. The ACMA proposes to supplement the existing supply of numbers, for these areas, in the Numbering Plan. The new numbers will only be available once the existing supply of numbers for these areas is exhausted.*

Industry agrees with this proposal.

## **3. Removal of geographic sectors**

*For numbering purposes, Australia is divided into over 200 charging districts, which in turn are divided into charging zones. Each charging zone comprises one or more standard zone units (SZUs). The charging zones of Sydney, Melbourne, Brisbane, Adelaide and Perth are also divided into sectors. The ACMA proposes to remove these sectors from the Numbering Plan. This will create additional flexibility for CSPs offering services to consumers and will improve the efficiency of geographic numbers.*

Industry agrees with this proposal.

Industry looks forward to continuing to engage productively with the ACMA and other relevant stakeholders in this important process.

\* \* \* \*