



## Re: INDUSTRY CODE DR C661:2022 REDUCING SCAM CALLS and SCAM SMS

Sinch Holding AB (which includes Sinch Australia Pty Ltd and MessageMedia) welcomes the industry code and the important initiative to reduce SPAM and Scam in the Australian market. As a global leader in cloud communications and mobile customer engagement, we align with the intention driving this work and regard the problems of SPAM and scams as amongst the most critical issues facing our industry.

Whilst we are broadly aligned with the code, we would like to highlight some concerns.

### 4.2.1e and 5.2.1e

Option 1 will have a negative impact on the ability of Sinch and select optimal suppliers. This will increase costs for both Sinch and end-users, reduce competition in the retail marketplace and limit or remove the ability for C/CSPs to use multiple providers for failover or redundancy, or easily change telcos.

Option 2 is our preference as these problems will not occur, and the existing high levels of competition in the market can continue. This benefits end-users, C/CSPS, keep existing competitive situations, redundancy and flexibilities remain.

### Alphanumeric SenderID (Alphatag) Registry

We note that the draft code doesn't specify any kind of centralised registration for registering Brand Alphatags.



Soon after the implementation of this Code we believe a centralised independent Alphanumeric SenderID (Alphatag) Registry be investigated by the industry where businesses and brands can register their Alphatags to protect consumers from messages purporting to be from an organisation that they are not. It is of critical importance that this central registry is independent to any C/CSP and cost-effective for organisations of any size to register and before sending a message with an Alphatag a C/CSP will lookup the register to ensure that end-user has given permission to utilise that Alphatag.

Yours sincerely,

Hugh Haley

**Regional Director**