

RE: Industry Code DR C661:2022: Reducing scam calls and scam SMS

To Whom It May Concern,

Yabbr Pty Ltd (“Yabbr”) appreciates the opportunity to comment on the options in the draft for clauses 4.2.1 and 5.2.1 of the code. Yabbr provides an aggregated communications platform used by Australian businesses of all sizes, with SMS and voice representing a substantial part of the offering. Yabbr is putting forward the following argument in favour of Option 2 for subclause (e) in both clauses:

- Option 1 is anti-competitive by nature, without offering any material advantage over Option 2 in regards to spoofing prevention.
- Subclauses (a) through (d) for both clauses already define the requirements for allocation, while subclause (e) does not provide further authentication of the caller/sender.
- Option 1 will impose an unfair burden on Australian businesses, in the form of increased costs through reduced competition and/or the need to hold numbers with multiple carriers to ensure redundancy. It may also require changes to core business operations and/or systems. These costs will undoubtedly be passed on to consumers.
- Following on from the above point, Option 1 will impact brand recognition for Australian businesses by forcing them to use multiple numbers for their communications. This will actually assist scammers as it will become commonplace to receive communications from businesses using new or different numbers.
- Option 2, in both clauses, accommodates long standing trends of legitimate industry use, while accommodating continued competition in the wholesale and middle markets.

Kind regards,

Dave Ertel
CIO
Yabbr Pty Ltd