

20 March 2024

SMS Sender ID Registry Consultation
Communications Services and Consumer Division
Department of Infrastructure, Transport, Regional Development, Communications and the Arts

Via portal: infrastructure.gov.au

Dear Secretariat

SMS Sender ID Registry – Fighting SMS Impersonation Scams Consultation

COBA welcomes the opportunity to comment on the Department's consultation on the type of SMS Sender ID Registry to be implemented in Australia.

COBA represents Australia's customer owned banks (mutual banks, credit unions and building societies). Collectively, our sector has over \$175 billion in assets and is the fifth largest holder of household deposits. Customer owned banking institutions account for around two-thirds of the total number of domestic Authorised Deposit-taking Institutions (ADIs).

Key points

COBA supports the creation of the SMS Sender ID Registry as an effective tool to help combat impersonation scams.

Customer owned banks, like other banks, continue to have their customers subject to bank impersonation scams.

We support a mandatory Registry as it provides the strongest protection for our customers and our members' brands.

We believe that for it to be the most effective all telecommunication providers should be participants of the Registry and be required to block unauthorised alphanumeric SMS messages.

Bank impersonation scams

Like other banks, our customers can be the targets of SMS impersonation scams, which can include the use of alphanumeric sender IDs impersonating the bank. Scammers utilising these sender IDs can convince our customers to do things that they would not ordinarily do but are led to do so under the impression that they are talking to their bank.

We support a mandatory Registry as it provides the strongest protection for our customers and our members' brands. This means anyone who wants to use sender IDs must register to use them. A voluntary Registry is unlikely to be effective as it will allow scammers to move between those sender IDs that are registered and those that are not (for example, to similar sender IDs that can still evoke a

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sense of trust). This will leave a significant backdoor for customers to continue to be scammed and will not deliver the same level of confidence or protection that a mandatory Registry will provide.

Additionally, a voluntary Registry will likely see fewer registered entities that could see higher costs imposed on those entities that choose to be registered. We expect the negative impacts of a mandatory Registry to be minimal, as any business or organisation that does not wish to be registered or to pay the accompanying fees will continue to have the option to utilise other forms of SMS messaging and will simply be prevented from being able to use alphanumeric IDs.

COBA considers the estimated registration and subscription costs outlined in the Paper to be reasonable. COBA has also provided further information on technical issues to ACMA late last year.

COBA notes the likely effect of the Registry is a shift of scammers from alphanumeric messaging to SMS messaging utilising phone numbers or a greater use of telephone scams. As such, we recommend that consideration be given towards further steps to combat scams utilising these numbers.

We look forward to engaging with the Department on this issue and thank you for taking our views into account. Please do not hesitate to contact [REDACTED], Policy Manager ([REDACTED]) if you have any questions about our submission.

Yours sincerely

[REDACTED]

[REDACTED]
Chief Executive Officer