



Response to Consultation

SMS Sender ID Registry

Att: Communications Services and Consumer Division
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594 Canberra ACT 2601

20 March, 2024

1. About Us

Yabbr is a wholly Australian owned and operated communications startup, based in Brisbane. The Yabbr platform combines a variety of communication mediums (SMS, MMS, Web, Voice, and Social Mediums) into a single screen, enabling our clients to engage effectively with their customers using broadcast campaigns, or 1-on-1 conversations. Yabbr has been fortunate to build a large customer base across a wide variety of industries and organisation sizes. We believe this gives us a unique and privileged perspective on the business communication landscape in Australia.

2. Executive Summary

Yabbr emphatically supports any technically, financially and morally sound initiatives to prevent or reduce the impact of scams on Australians. While we do not believe that a Sender ID Registry is a preferable or infallible tool to use in the fight against malicious actors, we believe that a voluntary register is a better option for Australian businesses than a mandatory register.

A voluntary register strikes a compelling balance between giving businesses the opportunity to protect their brands and users, while not crippling SMEs or international brands who still want to participate in A2P messaging in Australia.

3. Detailed Response

3.1. Have you, your organisation, or clients been targeted by SMS impersonation scams that used your alphanumeric sender ID(s)?

1. We have not had any reports of Yabbr or its clients being targeted by SMS impersonation scams. Unfortunately, we understand that this could change at any time while routes exist that do not adhere to the Communications Alliance C661:2022 Reducing Scam Calls and Scam SMS Industry Code.
2. C661:2022 sets out well considered guidelines that, if enforced, can prevent Sender ID impersonation in a majority of cases. As a CSP, we implement strict SMS Sender ID controls in compliance with C661:2022. To date Yabbr has not had any reports of our platform being involved with any scam or spam traffic.
3. A good alternative to a Sender ID Registry would be a C661:2022 Compliance Registry, where SMS with an alphanumeric Sender ID would be blocked or tagged unless they were submitted by a registered CSP.

3.2. Do you support the introduction of a voluntary or mandatory SMS Sender ID Registry for alphanumeric sender IDs? Why?

3.2.1. Commentary on Registries in General

1. Both voluntary and mandatory registries, while well-intentioned, are fraught with risk. These include cost and technical concerns, with flow-on potential impacts on legitimate business and innovation.
2. The cost of such systems is inherently inflated due to implementation and operational inefficiencies, and red tape, which could see even the registration fees being prohibitive to very small businesses. In addition to the simple registration fee, significant investment is required to gain an understanding of the system, complete the registration process, maintain the registration and implement any necessary system or software changes. These costs form significant barriers to SMEs which can result in disadvantage leading to anticompetitiveness.
3. Technical issues include security, reliability and the implementation difficulty for any carrier, carriage service provider or business that may need to integrate with the registration system. Any technical imperfection could indirectly cause widespread disruptions to Australian A2P SMS with a flow-on effect to the entire Australian economy.
4. Malicious actors often adapt quickly to regulatory changes, and there is a risk that they will find new ways to circumvent the registry's protections. This could lead to a false sense of security among consumers and potentially divert resources away from more effective measures.

3.2.2. Commentary on Mandatory Registries

1. A mandatory registry, such as that adopted in Singapore, presents a significant barrier to entry for many legitimate businesses, particularly international businesses that have a legitimate use case for alphanumeric sender IDs with SMS to Singaporean numbers. Our experience has shown that in most cases it is no longer economically viable to deliver SMS to Singapore since the introduction of the SSIR, due to registration complexities and overheads rather than direct costs.
2. Assuming an Australian implementation did not inherit any of the issues of the SSIR, it would still present challenges to Australian small businesses and startups in the form of time delays and cost.

3.2.3. Commentary on Voluntary Registries

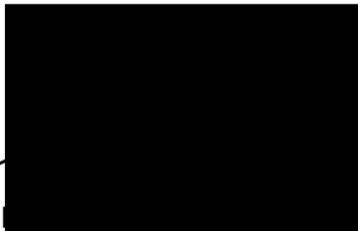
1. Voluntary Registries present a happy middleground. Businesses in high-risk industries (government, banking, health, etc.), or with strong brand integrity, could voluntarily register their Sender IDs and benefit from the protection of their brand.

2. Businesses not willing, ready or able to register their sender IDs, in either the short or long term, would not be negatively affected by the introduction of the registry.
3. Brands who are registered can advertise their sender IDs as “protected” to promote consumer confidence.

3.3 What, if any, transition arrangements are required?

1. Our opinion is that for a voluntary registry, a short period of only 6-12 months would be sufficient to allow businesses that are keen for registration to do so and carriers/carriage service providers to develop technical support and processes. As there would be no significant disadvantages to businesses that did not register their sender IDs, there would be no need to draw out this process.
2. On the other hand, for a mandatory registry, a relatively long period of 1-3 years would be required to ensure no unnecessary disadvantages or negative impacts are imposed on legitimate Australian businesses. During this period, the government and carriers/carriage service providers would need to make significant investments in education and implementation. In this case it would make sense to first implement a voluntary registry, followed by a soft enforcement (similar to the “likely scam” tagging in Singapore) of the mandatory registry, before the mandatory registry came into full force. Businesses and consumers alike would need to be provided with information to understand the purpose and impact of the registry. Businesses would need ongoing feedback on whether their current processes are likely to be impacted by an upcoming stage of the transition, such as if their traffic will soon be tagged as a scam or blocked.

Yours sincerely,



Chief Information Officer
Yabbr Pty Ltd