

7 August 2025

Ms Silvia Superina
Manager
Scam Reduction Section
Australian Communications and Media Authority

Via email: senderIDregister@acma.gov.au

Dear Ms Superina

Proposed changes to the SMS sender ID register ('the Register')

COBA thanks ACMA for the opportunity to provide feedback on its proposed changes to the draft SMS Sender ID Register Industry Standard 2025.

Participation of domestic and international entities without an ABN in the register

COBA supports this proposed change, provided appropriate safeguards are implemented. In our previous 28 April 2025 submission to ACMA,¹ we noted that many COBA members use third party providers for key aspects of their security processes. In these instances, the third party not the bank controls the originating phone number and telecommunications provider. This could result in this disruption method capturing One Time Passcodes or Multi-Factor Authentication messages.

We ask ACMA to be aware of this potential barrier to key security messages reaching bank customers overseas. While including non-ABN holders, such as legitimate service providers, is reasonable and may support legitimate communication channels, COBA members note the risk that perpetrators can potentially register under false pretences without an ABN requirement check. As such, COBA encourages ACMA to provide guidance on how registered entities can monitor and detect perpetrators which have effectively bypassed the control and sent SMS messages using the entity's registered number. Preventing misuse of the Register and potentially fraudulent activity is key for this approach to be effective.

Use of term 'unverified' for unregistered sender IDs

COBA has consistently supported a mandatory register as an essential tool to combat scams. We support ACMA's proposed approach to label messages from international entities or telecommunications providers as 'unverified'. We consider this to be a balanced approach, which signals to Australian consumers that they should take care in reacting or responding to international messages received, while not creating unreasonable impediments to legitimate messages from banks to their customers overseas.

While COBA supports the change to 'unverified', we note that some COBA members are concerned it could be too soft a term to be an effective deterrent. These members have suggested a preference for ACMA to use this term over a short transition period, such as three months, as entities register SMS Sender IDs. COBA recognises that if ACMA were to adopt a transitional period approach then it must be sufficient to allow international entities to navigate the verification process and receive approval, otherwise this poses a risk of serious disruption to messaging services. Where possible, ACMA should assess the 'unverified' label's effectiveness as part of its next review of the Register.

Question 8 – revised approach to establishing a valid use case fit for purpose

¹ See COBA submission on the proposed standard for the SMS Sender ID Register (28 April 2025).

For ABN entities, clause 11(4) does not appear to accommodate for SMS Sender IDs that are shortened versions of registered names (due to character limits on SMS Sender IDs), or where additional words such as 'verified' are added to the registered business name. This would not be an exact match to a registered business name, and so we would recommend additional flexibility be introduced for this scenario.

We thank ACMA for taking our views into account. Please do not hesitate to contact Rebecca Barlow, Policy Advisor (rbarlow@coba.asn.au) if you have any questions about our submission.

Yours sincerely

A handwritten signature in black ink, consisting of the letters 'M' and 'N' in a stylized, cursive font, with a horizontal line underneath.

MARK NGUYEN
Chief of Policy