

28 April 2025

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

Via [portal](#)

Dear Ms Superina

ACMA consultation on proposed standard for SMS Sender ID Register

COBA thanks ACMA for the opportunity to provide feedback on its consultation on the proposed standard for the SMS Sender ID Register (the Register).

COBA is the industry association for Australia's customer-owned banks (mutual banks and credit unions). Collectively, our sector has over \$182 billion in assets and is the fifth largest holder of household deposits. Our members range in size from less than \$200 million in assets to around \$25 billion in assets – all significantly smaller than their ASX-listed peers. Customer-owned banks account for around two thirds of the total number of domestic Authorised Deposit-taking Institutions (ADIs) and deliver competition and market leading levels of customer satisfaction in the retail banking market.

Disruption method

COBA has consistently supported a mandatory Register as an essential tool to combat scams. We support ACMA's proposed approach to label non-registered sender ID messages with the label 'likely scam'. However, due to experiences of customers ignoring scam warnings some of our members support having scam messages blocked. As such, the proposal to conduct a review after 12 months of operation to consider the effectiveness of labelling is appropriate.

We seek clarification on what, if any, impact the Register and labelling will have on messages sent overseas. This is particularly key when our members need to send important messages to their customers while they are travelling. For example, if customers require multi factor authentication (MFA) or one-time passcodes (OTPs) to access payments or bank accounts. While the extra protection of the Register is desirable, we do not wish it to be an undue burden in providing essential communications to overseas customers.

Additionally, ACMA could consider whether positive labelling should also be adopted alongside negative labelling. This could provide further consumer confidence that messages are genuine. For example, messages from registered sender IDs could also contain a label like 'verified'.

Registration process

APRA authorised contacts

We support the intention to allow both telecommunications providers and entities to add sender IDs to the Register. However, considering the high risk coming from phone porting we believe it could be appropriate to introduce additional verification steps for financial institutions. In addition to the intention

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of using the Australian Business Register to verify authorised contacts, we suggest that, if possible, ACMA should also use APRA's information for verifying authorised contacts. This should bring greater control and security to the process.

Third party providers

Many of our members use third party providers for key aspects of their security processes, for example, issuing OTPs or MFA. This is done on their behalf and will usually appear under the members' sender ID, however, the originating phone number and telecommunications provider used are often under the control of the third-party provider and not the bank. This could mean that some of the OTPs or MFA messages could be caught by the disruption method. We ask that ACMA, and its regulated entities, be mindful of this dynamic and to proactively work with banks to address this through the transition.

International entities and telecommunications providers

COBA recognises ACMA's outlined challenges in the treatment of international entities and telecommunication providers, including that there are many legitimate international organisations and entities that will use sender ID when messaging into Australia. COBA proposes that messages from international entities or telecommunications providers could potentially be labelled 'unverified' by the receiving Australian telecommunications provider. This would signal to Australian consumers that they should take care in reacting or responding to international messages received.

Dispute resolution

Finally, COBA asks for robust timeframes for the quick and effective completion of disputes raised by banks with telecommunication providers and/or ACMA. This is particularly important where the disruption method has been mistakenly applied to legitimate messages. Our concern is especially focused where communications with customers is required under other regulation. For example, APRA's CPS 230 Operational Risk Management where communications may be needed where there are disruptions to payments systems or to material service providers.

We thank ACMA for taking our views into account. Please do not hesitate to contact Robert Thomas, Senior Manager Policy (rthomas@coba.asn.au) if you have any questions about our submission.

Yours sincerely



MICHAEL LAWRENCE
Chief Executive Officer