

8 September 2025

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

Via email: senderIDregister@acma.gov.au

Dear Ms Superina

Draft SMS Sender ID Register (Application, Access and Administration) Determination 2025 Consultation

COBA thanks ACMA for the opportunity to provide feedback on its proposed requirements for the SMS sender ID register.

COBA is the industry association for Australia's customer owned banks (mutual banks, credit unions and building societies). Collectively, our sector has over \$185 billion in assets and is the fifth largest holder of household deposits. Customer-owned banks (i.e. mutual 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.

Question 9 – implementation timeline

COBA proposes that ACMA amend the 15 December 2025 register commencement date to allow sufficient time for implementation to ensure there are not unintended consequences. Entities currently have a narrow window of two weeks – from 30 November 2025 to 15 December 2025 – to register business names for alphanumeric messages. If entities fail to register on time, then the messages will be labelled as 'likely scam'. Considering the likely significant volume of names that will need to be registered we are concerned that the current timeline will be too short to process all these registrations.

COBA believe it is critical that all customer-owned banks are registered on time to avoid confusion and wants to ensure there is sufficient time and resourcing to do so. Due to the significant volume of names to be registered we are concerned that COBA members which take proactive steps to register on time may not be registered in time. This risks their messages being flagged as 'likely scam' for a period after the commencement of the register, which will cause significant disruption for their customers. Considering that banking services are a core activity for all Australians, the failure to have all banks registered in time could have significant negative flow on impacts to the economy.

Registration requirements for entities without an ABN

COBA supports the proposed requirement for entities without an ABN to apply to register through a certified telco (CT), or an international partner of a CT, or ACMA. For applications made via a CT, the CT will be responsible for checking the entity is legitimate and that it has a valid use case for the sender ID. We consider this to be a balanced approach which allows non-ABN holders to participate in the register but still requires them to go through a registration application process. In our 7 August 2025 submission to ACMA, COBA supported the participation of domestic and international entities without an ABN in the register, provided appropriate safeguards were implemented, and we are satisfied with ACMA's revised approach.

Question 8 – appropriate frequency for revising records

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COBA suggests that ACMA amend its proposed requirement for register participants to review and update their register records to every six months to reduce administrative burden. While we understand the importance of keeping register records accurate and accept that this will involve some administrative work for register participants, we do not believe that this needs to be done on a three-month basis. Larger entities may have the resources and capacity to meet this requirement however, for smaller entities like COBA members, this will likely be overly onerous considering their more limited resources and need to meet other regulatory/compliance requirements. Providing more flexibility around the records review requirement, such as allowing reviews on a six-month basis, will minimise the administrative burden on smaller entities and reduce the likelihood of non-compliance. In providing this flexibility ACMA may wish to keep the three-monthly review for larger entities but allow smaller entities to conduct six-monthly reviews.

ACMA development and distribution of user guides for entities and telcos

COBA has consistently supported the register as an essential tool to combat scams, and we welcome any guidance ACMA can provide on preventing misuse of the register and potentially fraudulent activity. In our 7 August 2025 submission, we encouraged 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. COBA supports ACMA's proposal to develop and distribute user guides for entities and telcos separately from the draft determination.

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, appearing to be 'MN' with a horizontal line underneath.

MARK NGUYEN
Chief of Policy