



Australian Government

**Department of Infrastructure,
Transport, Regional Development,
Communications and the Arts**

Ms Joanna Abhayaratna
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Office of Impact Analysis
Department of the Prime Minister and Cabinet
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BARTON ACT 2600

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Dear Ms Abhayaratna

Impact Analysis – Fighting SMS impersonation scams: The SMS Sender ID Register model for Australia – Second Pass Assessment

I am writing in relation to the attached Impact Analysis (IA) prepared for the *SMS Sender ID Register model for Australia*.

The revised IA addresses the feedback provided in your letter of 07 November 2024.

The Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA) has strengthened the sections relating to the necessity of Government action, the consultation processes undertaken and the evaluation of the chosen implementation option against success metrics.

Specifically, we have:

- further articulated why Government action is needed to address the problem of SMS sender ID impersonation scams;
- included a brief overview of the cost-benefit analysis and its headline results in the Executive Summary;
- outlined the alternative action to government intervention (status quo option) and included further detail as to why this is not recommended;
- provided critical assessment of the approach to consultation that analyses areas of agreement and disagreement, and provided an analysis of which groups were in favour of, and opposed to, mandatory registration;
- provided a specific reference to further opportunities for consultation;

- cited the diversity of submitters contributing to the consultation processes and included an explanation of how stakeholder views have shaped the recommended approach; and
- updated the evaluation section of the chosen option against success metrics, which includes evaluation of success against Register objectives.

The OIA's comments included the suggestion that the IA provide further information about the potential costs and regulatory impost of a mandatory versus a voluntary model, specifically including the likely impacts on smaller businesses using sender IDs and removing barriers for these small businesses registering sender IDs (for example, lower fees for registration). The charging structure for the Register will be the subject of a future Government decision regarding the cost-recovery mechanism.

In relation to the specific evidence to support the notion that the voluntary registration scheme is less effective than a mandatory scheme, the Department is reluctant to provide this level of detail in a public-facing document so not to provide guidance to scammers.

Accordingly, I am satisfied that the IA is consistent with the six principles for Australian Government policy makers as specified in the *Australian Government Guide to Policy Impact Analysis*.

I submit the IA to the Office of Impact Analysis for formal final assessment.

Yours sincerely



James Chisholm
Deputy Secretary, Communications and Media
Department of Infrastructure, Transport, Regional Development, Communications and the Arts

13/11/2024