Submission: Sender ID Register Cost Recovery

Nov 6, 2026 ·

Summary of our position

SMS Broker Pty Ltd opposes the proposed annual, per-sender-ID application fee, and opposes any model that makes telecommunications providers collect it on the ACMA's behalf.

SMS Broker Pty Ltd is an Australian messaging provider (telco) serving thousands of small business customers since 2003. We operated under the brand, Bulk SMS (www.bulksms.com.au). We built and run the systems that submit our customers' sender IDs to the Register, at our own cost and at no charge to them.

Our main concerns:

- **No evidence of benefit.** The paper asks registrants to pay every year but gives no data showing the Register has reduced SMS impersonation scams since 1 July 2026.
- **Telcos as unpaid collectors.** The proposal moves the ACMA's billing, bad-debt and fraud risk onto telcos, with no compensation and no practical way to recover the cost.
- **A broken promise to registrants.** Businesses registered when the Register was free. From 1 July 2027 they must re-apply and pay, then pay again every year.
- **Stacked costs with no exclusivity.** A small business already pays for its business name and its domain. A sender ID adds a third annual charge per brand, and unlike a domain it confers no exclusive right.
- **Possible double funding.** The Government has already provided $2.2 million a year in ongoing funding from 2028–29. The paper does not explain how the fee relates to that appropriation.

Show that the Register works before charging for it

Before any fee is set, the ACMA should publish evidence that the Register is reducing scams. The consultation paper contains none.

The only scam figure in the paper is 21,695 text scam reports and $11.7 million in losses from 1 January to 7 October 2026. That period is mostly before the Register commenced on 1 July 2026, and the figure is not split into before and after. It says nothing about whether the Register has had any effect.

The paper reports adoption instead: 62,406 sender IDs and 42,148 entities registered by 19 October 2026. Registrations measure compliance cost borne by business, not consumer benefit.

Reporting so far runs one way. Telcos are required to report to the ACMA every quarter, yet the ACMA has not offered to report back to industry or registrants on what the Register is achieving. If registrants and telcos are to fund the Register, the ACMA should report its results to them on the same quarterly basis.

We ask the ACMA to publish, before finalising any charging model:

1. Monthly Scamwatch reports and losses for SMS scams using an impersonated sender ID, for at least 12 months before and since 1 July 2026.
2. The number of messages relabelled 'Unverified' each month, and an estimate of how many were scams versus legitimate messages from unregistered senders.
3. Whether scam activity has moved to other vectors the Register does not cover, such as ordinary mobile numbers, RCS, OTT messaging apps and email.
4. How actual outcomes compare with the benefits forecast in the October 2024 cost-benefit analysis, which the paper cites as the basis for 'user-pays'.

If the Register cannot yet show a measurable benefit, it is premature to make tens of thousands of businesses pay for it every year.

Telcos should not be the ACMA's fee collectors

The ACMA should invoice and collect its own fee directly from registrants. Telcos should not be in the middle.

Telcos have already funded the Register's launch. We built the integrations, onboarded customers, verified their entitlement to each sender ID and answered their questions, all at no charge to them and with no funding from Government. The proposal now asks us to also act as the ACMA's billing agent, unpaid.

The paper says 'the way a telco obtains a fee from an entity would be a matter for each telco'. In practice that leaves us carrying every risk of collection:

- **Bad debt.** If we pay the ACMA when we submit an application and the customer does not pay us, we wear the loss.
- **Fraud.** The Register exists to stop scammers. Scammers using stolen cards to apply for sender IDs will generate chargebacks, and the fee is payable 'irrespective of whether or not the sender ID is ultimately approved'. Telcos would fund the ACMA's assessment of fraudulent applications.

- **No way to recover costs.** We cannot add a card surcharge to recover payment-processing costs. A fee the ACMA publishes at $17–$25 cannot credibly be marked up, so the cost of billing, reconciliation, reminders and support for every sender ID, every year, falls on us.
- **An unpredictable price.** The fee 'will likely vary from year to year' and could rise above $25. We cannot publish stable pricing, and customers will blame us for every change.
- **Tax and invoicing uncertainty.** The paper does not say how GST applies, or whether telcos would be treated as collecting a disbursement or making a taxable supply.
- **A second charge on telcos.** The paper also flags a separate levy on telcos for compliance and enforcement costs. Telcos would build the system, collect the fee and then pay a levy as well.
- **Support, every year.** Every sender ID application already costs us staff time. We explain the Register to customers, help them prove their entitlement to each name, fix applications that are rejected or incomplete, and handle complaints when messages show as 'Unverified'. Today that is a one-off cost at onboarding, which we absorbed at no charge. Under annual re-registration we would repeat it for every sender ID, every year. On top of that we would send renewal reminders, answer fee and payment queries, and deal with customers whose registration has lapsed. None of this is funded, and none of it can be recovered from a fee the ACMA sets and publishes.

The ACMA's argument that registrants 'do not have any direct contact with the ACMA or our systems' is a design choice, not a constraint. The ACMA already approves every participating entity and holds its details. It can send that entity an invoice and accept payment online, as other Commonwealth registers do. If the ACMA wants telcos to collect, it should pay a collection fee that covers our costs and indemnify us for bad debt and fraud.

Registrants were told it was free

The ACMA says the fee 'will not be applied retrospectively', but requiring every existing registrant to re-apply and pay on 1 July 2027 has the same effect. Over 42,000 businesses registered on the understanding that registration was free. One year later they would face a new annual charge for something they were compelled to do.

Registration was not optional in any real sense. A business that does not register has its messages relabelled 'Unverified', which tells its own customers the message may be a scam. Businesses are not creating 'extra or specific demand' for this service; Government imposed it on them to protect consumers.

A per-sender-ID fee falls hardest on small businesses. Many of our customers run several trading names, locations or product lines, and some small businesses hold 10 or more sender IDs. At $25 each, that is $250 a year for a business that may send only a few hundred messages. The paper itself expects businesses to respond by deregistering and consolidating sender IDs. Each one that does so will either send ‘Unverified’ messages or stop using SMS, which works against the Register's purpose.

Annual expiry adds a further risk. Every lapsed renewal turns a legitimate sender into ‘Unverified’. If consumers routinely see ‘Unverified’ on genuine messages from businesses they know, they will learn to ignore the label.

Three registrations per brand, only one with exclusivity

To use a brand name with customers, a small business would now pay for three separate registrations, each renewed on its own cycle. The sender ID is the only one that gives the business no exclusive right.

Registration	Administered by	Renewal	Exclusive right to the name?
Business name	ASIC	1 or 3 years	Yes, unique on the register
.com.au domain	auDA, via registrars	1 to 5 years	Yes
SMS sender ID	ACMA, via telcos (proposed)	Every 12 months	No

This burden may grow. auDA is considering requiring a registered company or business name to hold a .com.au domain. If that proceeds, protecting one brand would require a business name, a domain and a sender ID, every year, for every brand a business trades under.

A domain fee at least buys exclusivity: no one else can hold the name. A sender ID fee buys only the right not to be labelled ‘Unverified’. Charging for it annually, per ID, treats a consumer-protection obligation as if it were a commercial asset.

Responses to the consultation questions

Question 1: Is the proposed model appropriate under the Charging Policy?

No. The Charging Policy supports charging where an identifiable group 'creates extra or specific demand' for a regulatory activity. Registrants did not create this demand. Government mandated the Register to protect consumers, and the benefit falls on the public. That is a case for budget funding, which the Government has already provided at $2.2 million a year from 2028–29.

The model also fails the Policy's test that it be 'efficient and effective to charge'. Collecting $17–$25 per ID through around 500 telcos, each with its own billing, payment and fraud costs, is likely to cost the system more than it raises.

Question 2: What alternative models could be used?

In order of preference:

1. **Fund the Register from the existing appropriation.** If the $2.2 million ongoing funding covers operations, no fee is needed.
2. **A one-off fee per sender ID, with no annual renewal.** The costly step, assessing an application, happens once.
3. **A per-entity fee, capped regardless of how many sender IDs the entity holds.** This avoids penalising small businesses with several brands.
4. **If annual charging proceeds, the ACMA bills registrants directly** through its own portal, and telcos are not involved in payment.

Question 3: Do you agree with the proposed administration arrangements?

- **Charging only for sender ID applications, not participation:** we oppose a per-ID annual fee. If a fee is charged, a capped per-entity fee is fairer.
- **No pro-rata amounts:** acceptable only if registrations run 12 months from the date of approval. Combined with a common 30 June expiry, a business registering in May would pay a full year's fee for one month.
- **Telcos providing the fee and recouping it from customers:** we strongly oppose this, for the reasons above. The ACMA should collect its own fee.
- **Fee payable even if the application is rejected:** this should not apply where a telco has submitted the application, as it leaves telcos funding rejected and fraudulent applications.

Question 4: Should registrations last 12 months, and should there be a common expiry date?

12 months is too short. A registration should remain current until cancelled, with telcos confirming the sender's entitlement through their existing customer checks. If periodic renewal is needed, it should be no shorter than three years.

We oppose a common 30 June expiry. It would create one annual peak in renewals for telcos and the ACMA, and any renewal missed would turn thousands of legitimate senders 'Unverified' on the same day. Registrations should run from their own approval date.

Question 5: Should there be exemptions or lower fees?

Yes. We support exemptions for charities, not-for-profits and government agencies. Charging government agencies only moves money between Commonwealth, state and local budgets.

The paper leaves out small businesses, who will bear most of the cost. We propose:

- no fee for an entity's first sender ID, or for small businesses as defined by the ATO turnover threshold
- an annual cap per entity, so a business with several brands pays no more than for one or two IDs.

Recommendations

1. Publish before-and-after evidence of the Register's effect on SMS impersonation scams before settling any charging model.
2. Explain how the proposed fee relates to the $2.2 million a year ongoing appropriation, and fund operations from it rather than charging registrants.
3. If the Government considers the Register too expensive to fund, and the ACMA cannot show a measurable benefit to the community, consider abolishing it rather than shifting its cost to registrants and telcos.
4. If a fee is charged, make it one-off per sender ID, or a capped annual fee per entity, not an annual fee per ID.
5. Have the ACMA invoice and collect any fee directly from registrants. Do not require telcos to pay or collect it.
6. If telcos are required to collect, pay them a collection fee that covers their costs, and indemnify them for bad debt, chargebacks and fees on rejected applications.
7. Do not require existing registrants to re-apply and pay on 1 July 2027.

8. Keep registrations current until cancelled, or for at least three years, and do not adopt a common 30 June expiry.
9. Exempt charities, not-for-profits, government agencies and small businesses, or at minimum waive the fee for an entity's first sender ID.
10. Consult on the proposed telco levy for compliance and enforcement at the same time, so the full cost to industry can be assessed together.

We would welcome the opportunity to discuss this submission.

Yours sincerely,

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Reference: ACMA, *SMS Sender ID Register: Consultation on proposed cost-recovery arrangements*, November 2026. Submissions close COB 4 December 2026 (SenderIDRegister@acma.gov.au).