SMS SENDER ID REGISTRY - RULES OF REGISTRATION

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1. INTRODUCTION

One of the functions of the Commission for Communications Regulation ("ComReg"), as regulator of the electronic communications sector in Ireland (the "State"), is to manage the national numbering resource. ComReg's number management function, and its objectives, duties and powers in relation to that function, are set out in the Communications Regulation Act 2002 as amended and in the European Union (Electronic Communications Code) Regulations 2022 (S.I. No. 444 of 2022) which give effect to Directive (EU) 2018/1972 of the European Parliament and of the Council.

An SMS Sender ID is a class of number as set out in Appendix 10 of the Numbering Conditions of Use and Application Process (ComReg 15/136R4 as amended).

ComReg has mandated the establishment of a Sender ID Registry which will allow businesses to register their Sender ID with ComReg[1]. The Sender ID Registry should be effective in reducing the prevalence of scam SMS that use Sender IDs to impersonate legitimate businesses and organisations.

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[1] By means of Decision Instrument D14/24 – Decision Instrument for Sender ID Registry contained at chapter 7.6, of ComReg Response to Consultation 24/24 "Combatting scam calls and texts: Response to Consultation on network-based interventions to reduce the harm from Nuisance Communications", available here- Combatting scam calls and texts: Response to Consultation on network-based interventions to reduce the harm from Nuisance Communications | Commission for Communications Regulation

These Rules of Registration are derived from, and are in accordance with, relevant provisions of the Numbering Conditions of Use and Application Process ([ComReg 15/136R4](#) as amended) and Decision Instrument D14/24 – Decision Instrument for Sender ID Registry. These Rules of Registration aim to provide industry with all applicable policy rules regarding the Sender ID Registry in one convenient document. These Rules of Registration need to be read alongside the Sender ID Registry Terms and Conditions, and all other relevant Sender ID Registry documentation including the SMS Sender ID Registry Public Guide; the SMS Sender ID Registry PA/MSP Guide; and the SMS Sender ID Registry SIDO Guide.

2. DEFINITIONS

"Applicant" means a legitimate organisation that has a need to register a Sender ID in the State and applies for rights of use to a Sender ID through ComReg's Sender ID Registration Portal;

"ComReg" means the Commission for Communications Regulation, established under section 6 of the Communications Regulation Act 2002, as amended;

"End-User" means a user not providing public communications networks or publicly available electronic communications services;

"Mobile Service Provider" or **"MSP"** means an undertaking providing End-Users with land based/terrestrial publicly available mobile telephony services using a mobile network;

"Originating Participating Aggregator" or **"OPA"** means the PA from which the SMS carrying a Sender ID originates;

"Participating Aggregator" or "PA" means a SMS Aggregator that is registered with ComReg to transit or forward a SMS carrying a Sender ID destined for an Irish number;

"Participating MSP" means an MSP in the State, which is registered with ComReg to transit, deliver or forward a SMS carrying a Registered Sender ID bound for a subscriber with an Irish number, that has deployed the necessary technical filtering functions and business processes to enable it to accept SMS messages bearing a Sender ID from PAs;

"Registered Entities" means the SIDOs, Participating Aggregators and Participating MSPs;

"Registered Sender ID" means a Sender ID which is registered with ComReg for use in mobile terminated SMS;

"Registered Sender ID owner" or "SIDO" means the entity to which a Sender ID is assigned by ComReg for use with SMS. A SIDO could contract a third party to send their messages on their behalf via a PA rather than send them directly;

"Shared Sender ID" means a Sender ID which is assigned to a Registered PA for use by its own customers who do not wish to register their own Sender ID;

"Sender ID" means an alphanumeric originating address sent in SMS messages;

"Sender ID Registry" means the registry managed by ComReg of all Registered Sender IDs, the associated SIDOs, PAs and other relevant data;

"Sender ID Registration Portal" means the online platform available for submitting applications for rights of use for Sender IDs;

"SMS Aggregator" means a service provider that acts as an intermediary between businesses or individuals that wish to send or receive SMS messages, and an SMSC function within mobile telecommunication networks;

"Short Message Service Centre" or "SMSC" means a mobile telecommunication network element that stores, forwards, converts, and delivers SMS messages and maintains unique timestamps in text messages.

3. REGISTERED ENTITIES

1. A Mobile Service Provider wishing to be considered as a Participating MSP must first register on the ComReg Electronic Register of Authorised Undertakings (ERAU) if not already done so, before registering as a Participating MSP in the Sender ID Registry.

2. Any SMS Aggregator wishing to be considered as a Participating Aggregator must first register on the ComReg Electronic Register of Authorised Undertakings (ERAU) if not already done so, before registering as a Participating Aggregator in the Sender ID Registry.

3. An Applicant must register as the Sender ID owner in the Sender ID Registry, when applying for rights of use to a Sender ID, using the Sender ID Registration Portal.

4. SUBMITTING AN APPLICATION FOR A SENDER ID

1. Applications for Sender IDs must be submitted through ComReg's Sender ID Registration Portal.

2. There is at present no fee for the granting of rights of use to Sender IDs. ComReg however reserves the right to review its position and introduce a fee in the future, in accordance with regulation 81 of the 2022 Regulations[2].

3. Sender IDs will be assigned to applicants on a "first come, first served" basis who meet the eligibility criteria set out below at section 4(4) and at section 5.

4. Alphanumeric Sender IDs must comply with the following:

   a) have a minimum of 3 characters and a maximum of 11 characters.

   b) contain only permitted characters:

      a-z
      A-Z
      0-9
      @ ! # % & ( ) * + , - . / : ; < = > ? [Space]
      Characters with an Irish language fada *(subject to technical feasibility)*.

   c) not contain any other characters other than those permitted in the list above. Not permitted are characters with accents (E.g. è Ç), Greek letters (E.g. Ω Ψ) and include the following: £ $ " ' ¡ €, with the exception of the Irish Fada which is permitted;[3]

   d) contain at least one letter (a-z A-Z), except for permitted Network Dialable (short) Numbers; other requests will be considered on a case-by-case basis;

   e) not contain predominantly numbers, except for permitted Network Dialable (short) Numbers; other requests will be considered on a case-by-case basis;

   f) be in any combination of upper and/or lower case;[4]

   g) not be generic in nature (e.g. 'SMS', 'Verify', 'Doctor, 'Dentist', 'Flowers' etc);

   h) not be sensitive, offensive or obscene in nature;

   i) not contain leading or trailing spaces;

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[2] Numbering Conditions of Use and Application Process, ComReg 15/136R4, at 7.1(18).
[3] Numbering Conditions of Use and Application Process, ComReg 15/136R4, at 6(2)(footnote 15).
[4] Numbering Conditions of Use and Application Process, ComReg 15/136R4, at 6(3) Sender ID registration and filtering is case insensitive.

j) not be likely to cause confusion.

5. A SIDO may hold several Sender IDs, but normally no more than twenty. In the event that an Applicant requests more than twenty Sender IDs, ComReg reserves the right to request further information or documentation to justify the need based upon its merits.

6. The Applicant for a Shared Sender ID shall only be a Participating Aggregator.[5]

7. A Participating Aggregator or Participating MSP, acting as an agent and submitting an application on behalf of an Applicant, is responsible for completing appropriate due diligence checks to ensure that the Applicant fulfils the eligibility criteria set out in Section 5 below.

8. Permitted Network Dialable (short) Numbers, which are free to call and have already been assigned to the holder, that can be registered as a Sender ID are:
   a. Customer Support Short Codes (19XX);
   b. European Emergency Services (112) and National Emergency Services (999);
   c. Harmonised Codes of Social Value (116XXX).

9. ComReg reserves the right to refuse applications for a Sender ID where the proposed Sender ID is likely, in ComReg's view, to lead to confusion; to facilitate fraud or misuse; to incorrectly suggest state sponsorship; or to cause offence.[6]

10. ComReg has sole and absolute discretion in deciding which Sender IDs are suitable for registration[7].

5. ELEGIBILITY CRITERIA FOR A SENDER ID

1. Applicants, which are not the providers of electronic communication services or networks and are therefore non-authorised entities[8], may be assigned Sender IDs based on Regulation 79(5)(a) of [SI No 444 of 2022](link).

2. Rights of use for a Sender ID may only be granted once a clear link from the applicant to the Sender ID has been established

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[5] Numbering Conditions of Use and Application Process, ComReg 15/136R4, at 7.2(8)(c).
[6] Numbering Conditions of Use and Application Process, ComReg 15/136R4, at 7.2(8)(b).
[7] Numbering Conditions of Use and Application Process, ComReg 15/136R4, at 7.6(1).
[8] See [General Authorisation | Commission for Communications Regulation](link)

3. The Applicant must be a legitimate organisation and have a need to register a Sender ID in the State. The organisation shall demonstrate that it meets these criteria by submitting at least one of the following:

      i. An Irish Companies Registration Office (CRO) number (or international equivalent), Revenue VAT or business number or international equivalent.

      ii. A partnership/sole trader's Irish VAT number (or international equivalent) in their name(s) or proof of their business or Irish income tax registration.

      iii. For a trademark holder that holds a trademark that is enforceable in the State, the trademark number or a digital copy of the trademark certificate.

      iv. Registered charity number from the Charities Regulator or evidence of registration as a voluntary non-profit making organisation in the State; or

      v. Evidence that the Applicant's premises are in the State, e.g. Applicant's such as schools, clubs etc.[9]

4. If an Applicant is seeking to register a Sender ID that is not clearly linked to its company name or business, it may be requested to provide Trademark Certification and/or supporting information or documentation to justify its choice of Sender ID.

5. Any Applicant that does not meet the above eligibility criteria but wishes to make a case, or to submit other evidence that it is a legitimate organisation and has a need to register a Sender ID in the State, may still do so. ComReg reserves the right to refuse any application that does not meet the above eligibility criteria.

6. CONDITIONS OF USE FOR A SENDER ID

1. The conditions set out in Section 3 of the Numbering Conditions (ComReg 15/136R4 as amended) apply to all classes of numbers including Sender IDs.

2. Sender IDs may only be used for legitimate purposes. Failure to comply with the conditions of use for a Sender ID could constitute a hybrid offence under Regulations 104(54) and (6) of the 2022 Regulations.

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[9] Numbering Conditions of Use and Application Process, ComReg 15/136R4 at 7.2(8).

3. The Sender ID rights of use shall be held by only one SIDO for their exclusive use.
4. For the avoidance of doubt, the holder of the rights of use for a Shared Sender ID shall only be the Participating Aggregator to whom the Sender ID has been assigned.

5. Sender IDs cannot be transferred between SIDOs or sub-assigned by the SIDO to any other party.

6. Sharing a Sender ID is not permitted between SIDOs, except in the case where a Shared Sender ID has been assigned to a Participating Aggregator.

7. The Sender ID must be activated by the SIDO within 6 months of the date on which the right of use for the Sender ID was first assigned to the SIDO[10].

8. A SIDO may contract with one or more OPAs in the transmission of its assigned Sender ID.

7. WITHDRAWAL OF RIGHTS OF USE FOR A SENDER ID

1. Rights of use for a Sender ID can be withdrawn:
    i. if not utilised (at least one SMS message must be sent within any six-month period);
    ii. if the Sender ID has not been activated within six months of assignment;
    iii. in cases of misuse; or
    iv. if ComReg determines the holder is retaining the Sender ID to prevent its legitimate allocation. ComReg reserves the right to determine fair utilisation of Sender IDs.

2. Previous holders of a Sender ID that was not utilised cannot re-register the same or similar Sender IDs until a period of one month has passed since the date the Sender ID was withdrawn.

8. UPDATING OF RULES OF REGISTRATION

These Rules of Registration may be updated by ComReg from time to time. In case of any violation of these Rules of Registration, ComReg reserves the right to seek all remedies available by law.

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[10] Numbering Conditions of Use and Application Process, ComReg 15/136R4 at 3.2(1).