Implementation and Communications Plan for ComReg's SMS Sender ID Registry

Information for SMS Aggregators and Mobile Service Providers

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1 Executive Summary

1. In April 2024 the Commission for Communications Regulation ("ComReg") adopted a Decision to introduce a Short Message Service ("SMS") Sender ID Registry ("Registry") in Ireland.[1] The aim of the Registry is to protect SMS communications and prevent fraudsters from using spoofed SMS Sender IDs in conducting scams by SMS.

2. SMS is a text messaging service installed by default on mobile phones. In Ireland there are approximately 5.8 million mobile phone subscriptions[2] and substantial volumes of SMS are sent and received every year. In the 12 months to Q4 2023 2.1 billion texts were sent.[3] Application-to-Person ("A2P") messaging i.e., business to client/customer messaging, is very prevalent (~615 million texts over 12 months).

3. Clearly SMS is a key and relevant communications channel for consumers and businesses alike. Many organisations rely on SMS to communicate with their customers and clients e.g., for financial transactions, delivery updates and appointments. A2P text messages are often presented as originating from an alphanumeric source or "SMS Sender ID[4]" so that the customer or client may recognise where the text message has come from. ComReg estimates that there could be up to approximately 23,000 unique SMS Sender IDs currently in use in Ireland.

4. For the avoidance of doubt, the measures described here apply only to the use of alphanumeric Sender IDs and not to A2P or Person-to-Person messages sent from phone numbers or SMS short codes, which remain unaffected.

5. Worryingly however, fraudsters have in recent years compromised some A2P SMS communications by inserting scam texts into legitimate SMS message threads to deceive consumers, and many consumers have been negatively impacted as a result. ComReg and industry recognise this serious problem, and the implementation of an SMS Sender ID Registry is key to addressing it.

6. The Registry is one of several technical interventions that ComReg mandated in April 2024 to combat scam calls and texts in Ireland.[5] The Registry aims to improve

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[1] Decision Instrument for Sender ID Registry – D14/24. See ComReg Document 24/24, Section 7.6

[2] ComReg 24/71: Irish Communications Market Summary: Quarterly Key Data Report, Data as of Q2 2024

[3] ComReg 24/24: Combatting scam calls and texts Response to Consultation on network-based interventions to reduce the harm from Nuisance Communications

[4] "SMS Sender ID" or "Sender ID" means an _alphanumeric_ originating address in the TP-OA field of the SMS-TPDU of an SMS message as specified in the Third Generation Partnership Project technical specification 3GPP TS 23.040

[5] Decision Instrument for Sender ID Registry – D14/24. See ComReg Document 24/24, Section 7.6

trust in SMS and secure the SMS communications channel in Ireland for the benefit of consumers, businesses and society at large. Ireland's consumers and businesses should be able to trust the SMS messages they receive and recognise if they are genuine. The Registry aims to future-proof SMS as a reliable and trustworthy communications channel for businesses and organisations in Ireland.

7. ComReg regularly discusses the development and implementation of the Registry with industry (Mobile Service Providers and SMS Aggregators[6]) (see Section 2.2). However, not all Aggregators participate and therefore ComReg is publishing this Information Notice to ensure a broader reach. ComReg's aim is to ensure that SMS Aggregators handling A2P SMS on behalf of their organisational customers understand what the Registry is and what actions they need to take on behalf of their customers.

8. The purpose of this Information Notice is to:

- Provide an update on the design and development of the Registry and explain how relevant entities may participate.

- Highlight the actions that organisations, SMS Aggregators and Mobile Service Providers need to take to protect Sender IDs in Ireland.

- Outline the Implementation and Communications Plan for the Registry, as discussed with industry at the SMS Technical Sub-Group in November 2024.

- Broaden industry and organisational awareness of the Registry.

- Outline next steps.

9. Please note that, in the event of any discrepancy between this document and the Sender ID Decision Instrument D14/24, the Decision Instrument takes precedence.

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[6] Aggregators are authorised businesses capable of sending batch SMS messages on behalf of organisations and businesses

2 Introduction

2.1 Decision Instrument D14/24

10. In 2023 ComReg published a consultation[7] on combatting scam calls and texts. Research commissioned by ComReg at that time showed that in 2022 alone in Ireland there were:

   - approximately 365,000 cases of fraud as result of scam calls and texts, (or 1,000 cases a day).

   - up to 89 million annoying/irritating communications and 31 million distressing communications.

   - over 5,000 businesses that were the victim of fraud after receiving scam calls and texts.

11. Overall, the research commissioned by ComReg showed that the total quantifiable harm to society arising was conservatively estimated at circa €309 million per annum. Urgent action was therefore needed to safeguard consumers from the relentless problem of scam calls and texts.

12. ComReg issued its Response to Consultation 23/52 in April 2024, in which it mandated the implementation of an SMS Sender ID Registry as part of a suite of interventions to address scam calls and text messages.[8] The Decision Instrument for the SMS Sender ID Registry (D14/24) is set out in Section 7.6 of document ComReg 24/24.

2.2 SMS Technical Sub-Group

13. In ComReg document 24/35 published in May 2024, ComReg signalled the formation of an industry forum. The Nuisance Communications Industry Forum ("NCIF") was established to support industry in implementing the Registry and the other mandated interventions set out in document ComReg 24/24.[9]

14. The NCIF is comprised of a Steering Group and two technical subgroups (SMS

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[7] See ComReg 23/52: Consultation on combatting Nuisance Communications
[8] See ComReg 24/24: Combatting scam calls and texts - Response to Consultation on network-based interventions to reduce the harm from Nuisance Communications
[9] ComReg 24/35: Formation of the Nuisance Communications Industry Forum

Technical Sub-Group and Voice Technical Sub-Group). The SMS Technical Sub-Group is focussed for now on the implementation of the Registry in line with Decision Instrument D14/24.

15. ComReg also outlined preliminary details of the Registry, indicative requirements for SMS Aggregators and other entities, as well as provisional timelines for the work. The following tasks were set out for the SMS Technical Sub-Group:

- Agree and publish implementation and communications plans for the Registry; and

- Coordinate and oversee the implementation of the Registry.

16. The SMS Technical Sub-Group has met regularly since July 2024 and comprises Mobile Service Providers ("MSPs"), Aggregators, an independent Chair and ComReg.[10] Design and technical matters relating to the proposed Registry have been discussed, as well as indicative Implementation and Communications Plans. The SMS Technical Sub-Group was provided with an opportunity to comment on the indicative implementation and communication tasks for the Registry in November 2024.

17. ComReg welcomes industry's cooperation at the SMS Technical Sub-Group to date and emphasises the need for continued cooperation to ensure the successful implementation of the Registry.

2.3 SMS Sender ID Format

18. The format of Sender IDs must meet specific requirements. For the avoidance of doubt, these requirements are set out in Annex 2.

19. A Sender ID must be alphanumeric and have a minimum of three characters and a maximum of 11 characters.

2.4 Registry Design

20. ComReg will develop and manage the SMS Sender ID Registry[11] which will be a

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[10] Queries on participation in the SMS Technical Sub-Group should be sent by email to ncif@comreg.ie

[11] "Sender ID Registry" means the register managed by ComReg of all Registered Sender IDs, SIDOs and the Registered Entities which may transmit or terminate specific Registered SMS Sender IDs

secure repository of all registered SMS Sender IDs[12], registered Sender ID Owners ("SIDOs")[13] and registered electronic communications providers that transmit SMS messages bearing registered SMS Sender IDs, namely Participating Mobile Service Providers ("Participating MSPs")[14] and Participating Aggregators[15] ("PAs").

21. The Registry will operate on a "circle of trust" principle, where registered entities will first be validated before being granted access (see Figure 1). Participants must agree to adhere to the rules of operation[16] of the Registry.
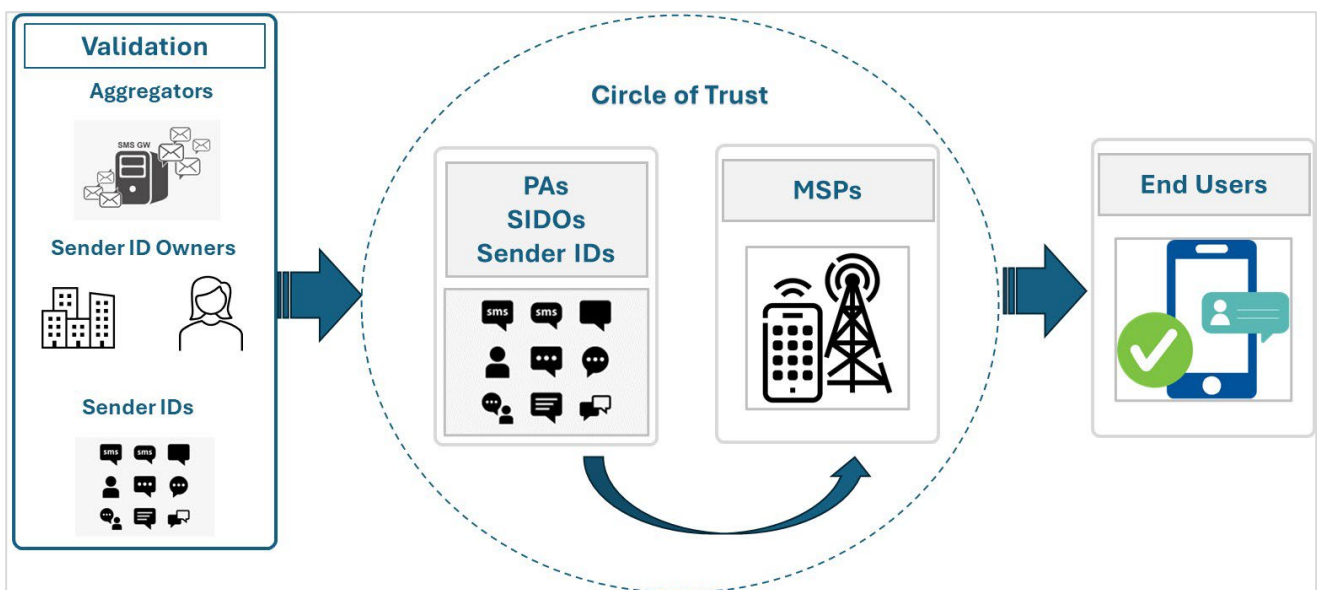
Figure 1: Sender ID Registry Design

22. ComReg is currently developing the Registry platform which is provisionally expected to be operational by the end of March 2025.

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[12] "Registered Sender ID" means a Sender ID that has been approved by ComReg for addition to the Sender ID Registry.

[13] "Sender ID owner" or "SIDO" means the entity to which a Sender ID is assigned by ComReg for use with transiting or terminating SMS. A SIDO is generally business or brand wishing to send SMS and could contract a third party to send their messages via a PA rather than send them directly.

[14] Network MSPs with over 270,000 Mobile Subscribers (excluding Machine-to-Machine (M2M) and Mobile Broadband (MBB)) are required to register with ComReg as Participating MSPs.
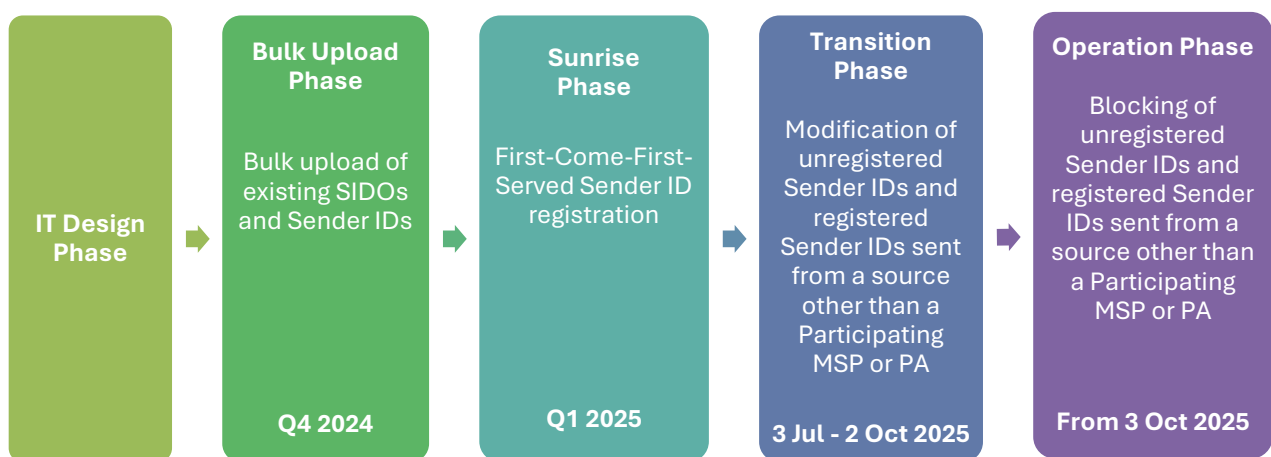
[15] "Participating Aggregator (PA)" means an SMS aggregator that signs up to the relevant Sender ID registry rules and carries messages bearing a registered Sender ID from SIDOs via an Irish MSP

[16] While these rules are being developed and discussed in the NCIF, ComReg will document and provide these to Registry participants in due course.

23. ComReg actively engages with industry at the SMS Technical Sub-Group on the development and implementation of the Registry. ComReg will provide detailed processes to MSPs, PAs and SIDOs in due course[17] to ensure a smooth implementation of the Registry.

2.5 Implementation Phases

24. The Registry will be implemented on a phased basis to minimise impact on industry, organisations and consumers. The indicative implementation phases for the Registry are shown in Figure 2.

IT Design Phase	Bulk Upload Phase Bulk upload of existing SIDOs and Sender IDs Q4 2024	Sunrise Phase First-Come-First-Served Sender ID registration Q1 2025	Transition Phase Modification of unregistered Sender IDs and registered Sender IDs sent from a source other than a Participating MSP or PA 3 Jul - 2 Oct 2025	Operation Phase Blocking of unregistered Sender IDs and registered Sender IDs sent from a source other than a Participating MSP or PA From 3 Oct 2025

Figure 2: Indicative Registry Implementation Phases

25. A short summary of the implementation phases is set out below and further detail follows in Chapter 3.

- **IT Design Phase:** ComReg's IT team is currently designing and developing the Registry and industry is being kept informed of IT developments at the SMS Technical Sub-Group.

- **Bulk Upload Phase:** This phase was introduced to take account of industry feedback at the SMS Technical Sub-Group and to expedite later implementation phases. The "Bulk Upload Phase" allows PAs and MSPs to register Sender IDs on their SIDO customers' behalf as part of a single bulk data submission to ComReg, by 20 December 2024. Following ComReg validation, this data will then be used to initially populate the Registry with details of existing Sender IDs and of the SIDOs permitted to use them.

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[17] Interested parties should email senderid@comreg.ie for more information on these processes

ComReg is currently engaging with industry to gather the relevant data. Further details on the Bulk Upload Phase are in Section 3.4.

- **Sunrise Phase:** It is provisionally expected that the Registry will be open to new SMS Sender ID applications on an individual registration and First-Come-First-Served ("FCFS") basis by the end of March 2025. Applications will be made via an online portal and ComReg will validate applications as appropriate. Only validated Sender IDs and SIDOs will be registered and accepted into the Registry. Further details of the Sunrise Phase are in Section 3.5.

- **Transition Phase:** It is intended that from 3 July 2025 until 2 October 2025 the Sender ID of all SMS messages bearing Sender IDs that have not been registered on the Registry as well as all SMS messages bearing registered Sender IDs which are sent via an unapproved route will be MODIFIED to alert end users that the Sender ID cannot be trusted and that the message may not be genuine. ComReg and the SMS Technical Sub-Group will consider the appropriate replacement Sender ID and communicate it via the NCIF in due course. During the Transition Phase Participating MSPs and PAs must check all received Sender IDs and modify them where needed. Applications for new Sender IDs will continue as normal during this phase and registration will be on an individual and FCFS basis, with ComReg validating applications as appropriate. Further details of the Transition Phase are in Section 3.6.

- **Operation Phase:** It is intended that from 3 October 2025 SMS messages bearing unregistered Sender IDs and SMS messages bearing registered Sender IDs but sent via an unapproved route will be BLOCKED from transmission by Participating MSPs and PAs. These messages will not reach end users. Applications for new Sender IDs will continue as normal during this phase and registration will be on an individual and FCFS basis, with ComReg validating applications as appropriate. Further details of the Operation Phase are in Section 3.7.

26. Chapter 3 sets out the indicative implementation and the communications tasks during the different phases of the Registry project.

3 Implementation and Communications Plan

3.1 Implementation

27. The Registry will be implemented in a series of phases to ensure minimal disruption to industry and consumers. Figure 3 shows the indicative Implementation Plan for the Registry. The detailed implementation and communications tasks for the different phases of the project are set out in Sections 3.3 - 3.7.
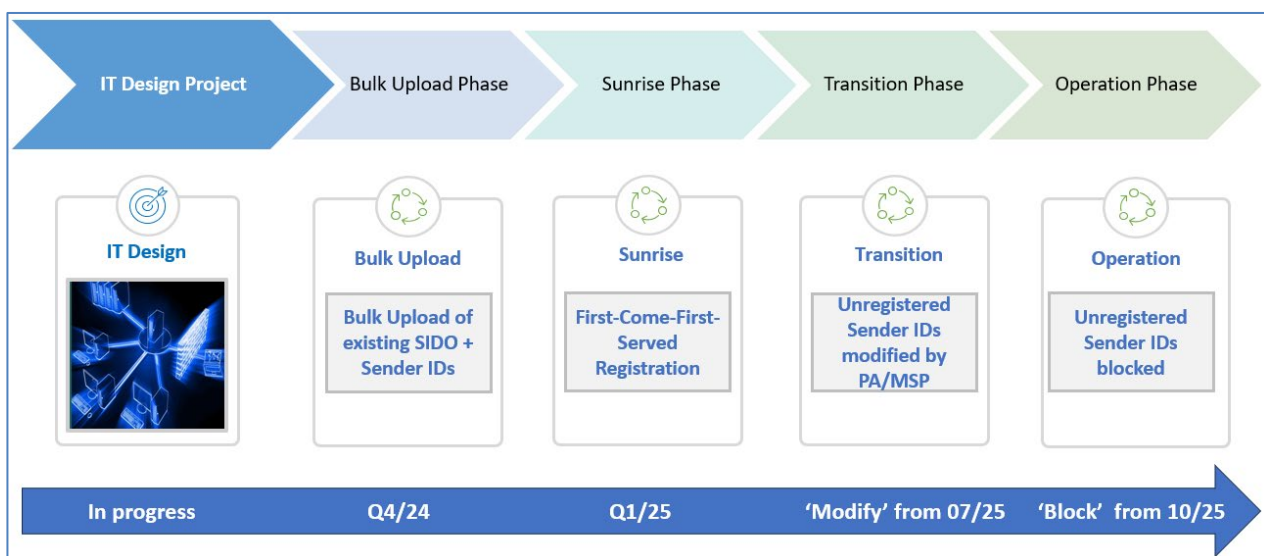

Figure 3: Indicative Implementation Plan for the Registry

3.2 Communications

28. ComReg and industry are working together to ensure the proper and successful implementation of the Registry. Timely and clear communications is essential.

29. Aggregators and MSPs are crucial to informing organisations and consumers about the changes to SMS arising from the implementation of the Registry. Aggregators and MSPs have direct links to organisations and consumers, and therefore have direct communication with SIDOs and consumers. ComReg will take a supporting role in this communication.

30. Different audiences will need to be targeted at different times of the project (see Figure 4).

31. Initially, MSPs and Aggregators will be informed by ComReg about the development of the Registry and the actions they need to take. ComReg has been communicating with MSPs and Aggregators on an ongoing basis at the SMS Technical Sub-Group meetings. However, not all Aggregators participate in the SMS Technical Sub-Group. Therefore, ComReg is publishing this Information Notice to ensure a broader reach. ComReg will seek to communicate directly to all MSPs and Aggregators before the end of 2024.

32. In early 2025 SIDOs will need to be informed of the need to register their Sender IDs[18]. MSPs and Aggregators need to take the lead role in communicating at this stage as they have the direct link to SIDOs who are their customers. ComReg has taken into account industry suggestions to allow PAs to register Sender IDs on behalf of their SIDO customers. This will provide greater flexibility for industry and SIDOs. For the avoidance of doubt, the rights of use of a registered Sender ID will remain with the SIDO and not the PA. ComReg will provide supporting communications to assist MSPs and Aggregators with their SIDO communications.

33. Finally, before any modification of SMS Sender IDs or blocking of SMS Sender IDs, consumers need to be informed of the changes to expect. MSPs are expected to take the lead in communicating with consumers as they maintain direct links to consumers (as mobile phone customers). ComReg will provide supporting communications to consumers.

ComReg communications to MSPs and Aggregators Q4 2024	→	MSP and Aggregator communications to SIDOs Q1 2025	→	MSP communications to consumers Q2-Q3 2025

Figure 4: Key Communications Audiences and Timings

34. Many of the implementation and communications tasks for this project need to be carried out concurrently. Therefore, in the Sections that follow (Sections 3.3 - 3.7), the implementation and communications tasks are set out alongside one another for the different project phases.

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[18] Provided the SIDO's Sender ID has not already been registered by their originating Aggregator as part of the Bulk Upload Phase

3.3 Registry Participation and Main Tasks for Participating Entities

35. All participants i.e., MSPs, Aggregators and SIDOs[19] will apply to register on the Sender ID Registry via an online portal.

36. Network MSPs with over 270,000 Mobile Subscribers (excluding Machine-to-Machine and Mobile Broadband) are required to register with ComReg as Participating MSPs according to decision D14/24.

37. SMS messages with Sender IDs from Aggregators and SIDOs who do not participate in the Registry will be blocked from 3 October 2025.

38. The high-level steps for entities wishing to participate in the Registry are set out in Figure 5. All applications will be checked by ComReg, and only validated entities will be accepted to participate in the Registry. ComReg reserves the right to accept and reject Registry participants. There is currently no fee to register on the Sender ID Registry.

Step 1 Apply to participate in Registry (MSPs, Aggregators, SIDOs)	Step 2 Validate (ComReg)	Step 3 Participate in Registry (Participating MSP, PA, SIDO)

Figure 5: Steps to Registry participation

39. The main tasks for the different entities are set out below:

- **Aggregators:** Aggregators must be authorised in Ireland before they can participate in the Registry.[20] When accepted to participate in the Registry, an Aggregator becomes a Participating Aggregator ("PA") and, in the case where a PA accepts SMS messages bearing Sender IDs from a SIDO, it becomes an Originating Participating Aggregator ("OPA") for those messages. OPAs will be permitted to transmit SMS messages bearing Sender IDs provided those Sender IDs and corresponding SIDOs have been registered as originating from that OPA. The OPA plays a vital role in the security of the registry by validating[21] that the SIDO has the right to use a given Sender ID at that time before accepting and transmitting an SMS bearing that Sender ID. Aggregators may apply to participate in the Registry

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[19] SIDOs should register only if they have not already been registered by their PA

[20] An Authorised Undertaking is an entity which provides an electronic communications network or an electronic communications service and is authorised in accordance with Regulation 6 of the European Union (Electronic Communications Code) Regulations 2022 (S.I. 444 of 2022). See https://serviceregister.comreg.ie/Faq

[21] OPAs will be required to periodically (re)validate the SIDOs' registration of each Sender ID used with ComReg. The details of this validation are being finalised and will be shared via the NCIF.

from the Bulk Upload Phase in Q4 2024 onwards. [22]

- **Mobile Service Providers ("MSPs"):** MSPs who wish to participate in the Registry are also required to apply for registration. When accepted to participate in the Registry, an MSP becomes a "Participating MSP". Participating MSPs may accept SMS messages provided those Sender IDs have been registered and arrive from a PA or another Participating MSP. MSPs may apply to participate in the Registry from the Bulk Upload Phase (Q4 2024) onwards.[23]

- **Sender ID Owners ("SIDOs")**: Organisations wishing to send SMS messages bearing Sender IDs will apply to register as Sender ID Owners. SIDOs must meet the eligibility criteria set out in Section 7.2(8) of ComReg's Numbering Conditions of Use.[24] SIDOs will be validated by ComReg before being accepted to participate in the Registry. PAs may apply to register their SIDO customers on their behalf from the Bulk Upload Phase onwards. If they have not already been registered as part of the Bulk Upload Phase, SIDOs may themselves apply to register from the Sunrise Phase (provisionally end March 2025) onwards.

- **Sender IDs:** From the Sunrise Phase (provisionally end March 2025) onwards (and provided they have not already been registered as part of the Bulk Upload Phase), individual Sender IDs will need to be registered, either by the SIDO or by an OPA on the SIDO's behalf. ComReg will validate Sender IDs and SIDOs before accepting them to the Registry. Sender IDs will be registered to specific SIDOs (who retain the Rights of Use of the Sender ID even if they were registered by their PA) and will be unique.

3.4 Bulk Upload Phase (Q4 2024)

Rationale and benefits of the Bulk Upload Phase

40. This phase was introduced to take account of feedback from the SMS Technical Sub-Group to minimise disruption at Registry "Go-Live" (provisionally end March 2025) and to make it as straightforward as possible for Aggregators and MSPs to register existing Sender IDs and existing SIDOs. During this phase there is no FCFS registration of Sender IDs. Instead, Originating Participating Aggregators (OPAs) and MSPs that handle SMS messages bearing Sender IDs (i.e., those with
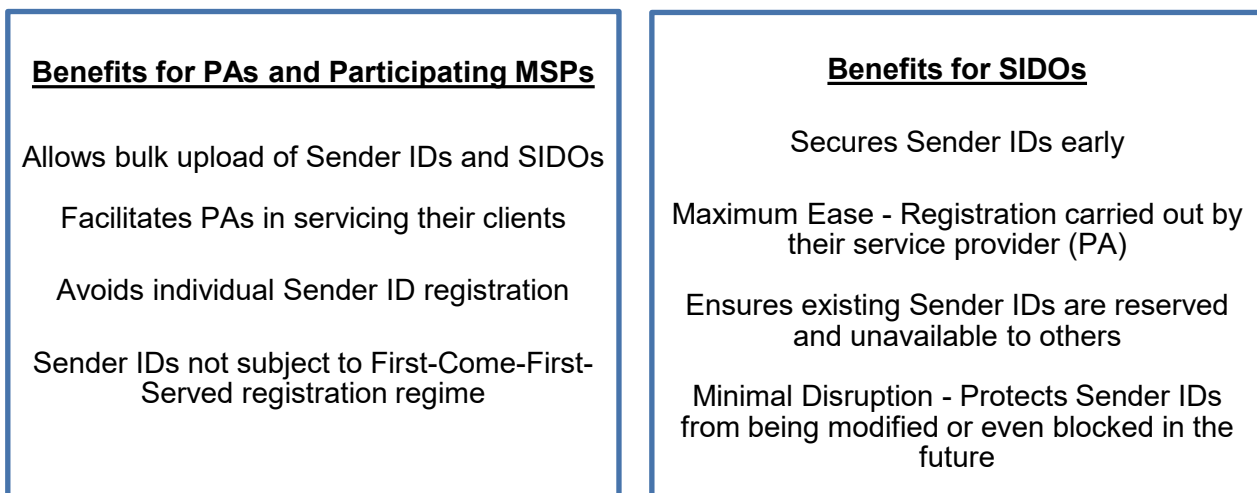
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[22] Please email senderid@comreg.ie in relation to registration during the Bulk Upload Phase

[23] Ibid

[24] ComReg 15/136R4: Numbering Conditions of Use and Application Process

direct links to SIDOs) submit bulk data to ComReg relating to their existing Sender IDs and existing SIDOs. ComReg will validate the data before pre-populating the Registry ahead of the Sunrise Phase.

41. The Bulk Upload Phase brings enormous benefits to MSPs, OPAs and SIDOs (see Figure 6). It allows MSPs and OPAs to submit bulk data on existing Sender IDs and existing SIDOs and it removes the need for registering individual Sender IDs which will apply from the Sunrise Phase onwards and will be on a FCFS basis. The Bulk Upload Phase is also crucial to SIDOs as it allows them to secure Sender IDs early, without a fee, prevents those Sender IDs from being acquired by others, and protects their Sender IDs from being modified or possibly blocked in the later Transition and Operation Phases.

Benefits for PAs and Participating MSPs	**Benefits for SIDOs**
Allows bulk upload of Sender IDs and SIDOs	Secures Sender IDs early
Facilitates PAs in servicing their clients	Maximum Ease - Registration carried out by their service provider (PA)
Avoids individual Sender ID registration	Ensures existing Sender IDs are reserved and unavailable to others
Sender IDs not subject to First-Come-First-Served registration regime	Minimal Disruption - Protects Sender IDs from being modified or even blocked in the future

Figure 4: Benefits of Bulk Upload Phase

42. NCIF members (including Aggregators and MSPs) have agreed to provide existing SIDO and Sender ID information to ComReg during the Bulk Upload Phase and this phase is currently underway.

43. **ComReg strongly encourages all SMS Aggregators and MSPs that handle SMS on behalf of organisations to engage in the Bulk Upload Phase without delay and before the Bulk Upload deadline of 20 December 2024.**

44. The implementation and communications tasks for the Bulk Upload Phase are set out below.

3.4.1 Implementation Tasks for Bulk Upload Phase

SMS Technical Sub-Group participation and Registration

45. ComReg encourages Aggregators and MSPs to become members of the SMS Technical Sub-Group, to stay abreast of regulatory developments on the Registry and to participate in the activities of the forum. Interested parties should email ncif@comreg.ie for more information.

46. Aggregators who wish to continue to handle SMS messages with a Sender ID must participate in the Registry and should apply to register as a Participating Aggregator. This will ensure that SMS messages bearing registered Sender IDs sent by these PAs on behalf of their SIDOs will not be modified or ultimately blocked. Aggregators should contact senderid@comreg.ie to register as a PA.

47. Network MSPs with over 270,000 mobile subscribers (excluding Machine-to-Machine and Mobile Broadband) are required to register with ComReg as Participating MSPs. This will ensure that any SMS messages bearing registered Sender IDs can be accepted for delivery from another registered MSP or PA. MSPs should email senderid@comreg.ie to register as a Participating MSP.

48. ComReg has provided the template and instructions for submitting data during the Bulk Upload Phase to relevant Aggregators and MSPs. Aggregators and MSPs participating in the Bulk Upload process must conduct and verify that they have performed SIDO Eligibility Criteria checks (due diligence). For more information on the Bulk Upload process please email senderid@comreg.ie.

49. ComReg has been providing access to an online portal for the submission of Bulk Upload data by PAs and Participating MSPs since 29 November 2024. If they have not already done so, PAs and Participating MSPs are encouraged to submit contact details of their nominated Bulk Upload users by email to senderid@comreg.ie without delay and well in advance of the Bulk Upload deadline of 20 December 2024 so that login access to the Bulk Upload portal may be arranged.

50. The data gathering for the Bulk Upload Phase has already commenced and will complete by 20 December 2024. In early 2025 ComReg will validate the submitted data before pre-populating the Registry. ComReg reserves the right to decide on the registration of PAs, Participating MSPs, Sender IDs and SIDOs.

3.4.2 Communications Tasks for Bulk Upload Phase

51. ComReg will issue direct and indirect communications to MSPs and Aggregators in Q4 2024. ComReg will write to all MSPs and Aggregators to explain the Registry and the actions they need to take. ComReg will also continue to deliver information sessions to the SMS Technical Sub-Group as required, to explain the Sender ID obligations under Decision Instrument D14/24, the need to secure the A2P channel

and support business customers, how the Registry will operate and how they can participate.

52. To ensure MSPs and Aggregators understand how to collate and submit Sender ID and SIDO data correctly during the Bulk Upload Phase, ComReg is available to hold bilateral meetings.[25]

53. In addition, ComReg is publishing this Information Notice on its website to explain how the Registry will operate, what actions are needed, as well as indicative timelines and next steps.

54. Aggregators and MSPs with direct links to SIDOs should start communicating with their SIDO customers, to inform them of the need to register Sender IDs early. It should be noted that active participation by the SIDO during the registration process will be required even when the application is handled by the OPA.

55. Table 1 sets out the implementation and communications tasks for the Bulk Upload Phase of the project.

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[25] Requests for bilateral meetings during the Bulk Upload Phase should be sent by email to senderid@comreg.ie

BULK UPLOAD PHASE			
	What are the tasks?	**Timeframe**	**Outputs/resources**
Implementation	**Participating MSPs and OPAs to:** • Register to become a member of the NCIF if not already a member • Provide contact details of nominated person responsible for Bulk Upload • Register as a PA or MSP • OPAs must first verify SIDO Eligibility Criteria and then submit their Bulk Upload data • Register on ComReg's Service Register (Electronic Register of Authorised Undertakings) if not already registered	Now Now Now Bulk Upload submission until 20 Dec 2024 Ongoing	Nominated contact details PA and MSP registration List of existing Sender IDs and SIDOs
	ComReg to: Check and validate Sender ID and SIDO applications	Q1 2025	Sender ID and SIDO Registrations
Communications	**OPAs (and Participating MSPs who are also OPAs) to:** Inform SIDOs of the need to register their Sender IDs	Now	Direct communications e.g., letters, emails, phone calls
	ComReg to: • Write to MSPs and Aggregators • Deliver information sessions to SMS Technical Sub-Group • Hold bilateral meetings where appropriate • Publish Information Notice on Sender ID Registry	Q4 2024	Letters to MSPs and Aggregators Information Sessions Information Notice (this document)

Table 1: Implementation and Communications Tasks for the Bulk Upload Phase

3.5 Sunrise Phase

56. The Sunrise Phase is provisionally expected to commence at the end of March 2025 and run until 2 July 2025.

3.5.1 Implementation Tasks for Sunrise Phase

Registration of new Sender IDs and SIDOs during Sunrise Phase

57. During this phase the Registry will be available for new Sender ID applications which will be processed on a First-Come-First-Served basis.

58. Organisations requesting Sender ID registration during this phase will submit their application online and will need to satisfy the eligibility criteria set out in ComReg 15/136R4[26]. Originating Participating Aggregators and Participating MSPs with directly connected SIDO customers may also submit Sender ID applications on behalf of their SIDO customers.

59. All applications for Sender IDs and SIDOs will be checked by ComReg and validated as appropriate. ComReg will make the final decision in relation to the registration of Sender IDs and SIDOs.

Transmission of SMS messages during Sunrise Phase

60. There is no change to the transmission of SMS messages with Sender IDs during the Sunrise Phase. Participating MSPs and PAs should continue to transmit all SMS messages to end users as before.

3.5.2 Communications Tasks for Sunrise Phase

61. Thousands of businesses and organisations use Sender IDs in their SMS communications to customers and clients. These organisations therefore need to be informed of the need to register their Sender IDs if those Sender IDs have not already been registered as part of the Bulk Upload Phase (see Section 3.4).

62. Originating Participating Aggregators and MSPs have direct business links to SIDOs and are therefore best placed to inform them (by letters, emails, phone calls) of the need to register their Sender IDs and how to register. Originating Participating Aggregators and MSPs may also apply to register Sender IDs on behalf of their SIDO customers during the Sunrise Phase.

63. As businesses and organisations rely on seamless communications with their customers and clients, it is important that Sender ID registration is completed without delay.

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[26] ComReg 15/136R4: Numbering Conditions of Use and Application Process (see Section 7.2(8))

64. Originating Aggregators that do not intend to become Participating Aggregators should inform any customers that use Sender IDs on SMS messages sent to mobile numbers in Ireland, that they will no longer be able to support Sender IDs after the commencement of the Transition Phase.

65. ComReg will support Originating Participating Aggregators and Participating MSPs in their communications during this phase by developing a guide for SIDOs. This will explain why Sender IDs need to be registered and what actions SIDOs need to take. ComReg may initiate further supplemental communications with SIDOs during the Sunrise Phase, for example, a communications campaign to increase awareness of the Registry and how to register Sender IDs.

66. Table 2 sets out the implementation and communications tasks for the Sunrise Phase of the project.

SUNRISE PHASE			
	What are the tasks?	**Indicative Timeframe**	**Outputs/resources**
Implementation	**SIDOs to:** • Register to participate in the Registry (if their Sender IDs have not already been registered by their OPA on their behalf) • Submit SIDO and SMS Sender ID applications via OPA or online Registry Portal	From End March 2025 (provisional) From End March 2025 (provisional)	SIDO applications and Sender ID applications
	MSPs and PAs to: • Transmit SMS messages as before • OPAs to submit Sender ID applications on behalf of SIDOs • Register on ComReg's Service Register (Electronic Register of Authorised Undertakings) if not already registered	Until 2 July 2025 From End March 2025 (provisional) Ongoing	Sender ID applications
	ComReg to: Check and validate Sender ID applications on a First-Come-First-Served basis	Q1 2025	Sender ID and SIDO Registrations
Communications	**OPAs (and Participating MSPs who are also OPAs) to:** Inform SIDOs of the need to register their Sender IDs	Now	Direct communications e.g., letters, emails, phone calls
	ComReg to: • Communicate with business representative bodies, government departments • Issue guide for MSPs and PAs to provide to SIDOs • Launch webpage with details of the Registry • SIDO targeted communication campaigns	Q1 2025	Letters and emails Guide for SIDOs Dedicated webpage Media assets

Table 2: Implementation and Communications Tasks for the Sunrise Phase

3.6 Transition Phase

67. The Transition Phase is expected to commence from 3 July 2025.

3.6.1 Implementation Tasks for Transition Phase

Registration of new Sender IDs and SIDOs during Transition Phase

68. Applications for new Sender IDs will continue to be processed on a First-Come-First-Served basis during the Transition Phase.

69. Organisations requesting Sender ID registration during this phase will submit their application online and will need to satisfy the eligibility criteria set out in ComReg 15/136R4. OPAs and Participating MSPs with directly connected SIDO customers may also submit Sender ID applications on behalf of their SIDO customers.

70. All applications for Sender ID and SIDO registrations will be checked by ComReg and validated as appropriate. ComReg will make the final decision in relation to the registration of valid Sender IDs and SIDOs.

Modification and Transmission of SMS messages during Transition Phase

71. During this phase, all SMS messages bearing unregistered Sender IDs will be modified to indicate that the Sender ID has not been registered. Registered Sender IDs sent via an unapproved route (i.e. not in a chain of one or more Participating Aggregators and Participating MSP(s)) will also need to be modified to alert the end user that the message may not be genuine.

72. The precise Sender ID which will be used for modified SMS is currently being considered.

73. In terms of SMS transmission, when an SMS bearing a Sender ID is transmitted during this phase, Participating MSPs and PAs must check the Sender ID of SMS messages received and:

- If the Sender ID is properly registered, Participating MSPs and PAs must transmit the SMS message unmodified on towards the end user, or

- If the Sender ID is not registered or has been sent by a source other than (i) a directly connected and securely authenticated registered SIDO for that Sender ID or (ii) a Participating Aggregator or Participating MSP, then Participating

MSPs and PAs must check that the Sender ID has already been modified. If the Sender ID has already been modified, Participating MSPs and PAs must transmit the SMS message towards the end user. If the Sender ID has not been modified already, Participating MSPs and PAs must modify the Sender ID before transmitting the SMS message towards the end user.

74. PAs and MSPs will need to adhere to all of the processes set out in the Registry documentation[27] including, but not limited to, management and updates from Registry lists.

3.6.2 Communications Tasks for Transition Phase

75. Consumers will need to be informed about the SMS changes they will experience prior to any modification of Sender IDs. Communications will be needed to help consumers to understand what to expect as well as what to do if they receive an SMS message with a modified Sender ID.

76. With the direct link to consumers, MSPs need to inform their customers of the SMS changes they will see during this Phase. MSPs should also inform their customer care staff of the SMS changes in case they receive consumer queries on the matter.

77. Aggregators and MSPs with direct connections to SIDOs will also need to continue to inform organisations of the need to register Sender IDs during the Transition Phase.

78. ComReg will supplement these communications to consumers and SIDOs during the Transition Phase.

79. The Transition Phase is expected to last for three months, until 2 October 2025. Table 3 sets out the implementation and communications tasks for the Transition Phase.

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[27] To be made available by ComReg in due course.

TRANSITION PHASE			
Type	**What are the tasks?**	**Indicative Timeframe**	**Outputs/Resources**
Implementation	**SIDOs to:** • Register Sender ID (if not already registered) or risk losing current Sender ID • Submit SIDO and SMS Sender ID applications via OPA or online Registry Portal	From End March 2025 (provisional)	Sender ID and SIDO Applications
	MSPs and PAs to: • Check all SMS Sender IDs received. If registered correctly, transmit SMS message onwards to end user. If Sender ID is unregistered or sent from an unapproved route, modify the Sender ID before transmitting the SMS message onwards to end user. • Where PA is acting as OPA, verify registration of Sender ID against securely authenticated SIDO before forwarding the SMS message and modify the Sender ID otherwise • Submit monthly metrics to ComReg in line with D14/24 • OPAs to submit Sender ID applications on behalf of SIDOs	From 3 July - 2 Oct 2025	Modify Sender IDs where needed and transmit SMS messages Monthly metrics submission Sender ID applications
	ComReg to: Check and validate Sender ID applications on a First-Come-First-Served basis	From 3 July 2025	Sender ID and SIDO Registrations
Communications	**MSPs to:** Inform consumers of the upcoming changes to SMS	From Q2 2025	Customer care awareness/training, direct communications to consumers (e.g., emails, bill inserts, newsletter, SMS), social media campaigns

TRANSITION PHASE			
Type	**What are the tasks?**	**Indicative Timeframe**	**Outputs/Resources**
	OPAs (and Participating MSPs who are also OPAs) to: Continue to inform SIDOs of the need to register Sender IDs	Now	Direct communications e.g., letters, emails, phone calls
	ComReg to: • Launch consumer focused communications campaigns • Add consumer information on ComReg website Continue SIDO targeted communication campaign	From Q2 - Q4 2025	Media assets Updated website

Table 3: Implementation and Communications Tasks for the Transition phase

3.7 Operation Phase

80. The Operation Phase of the Registry is expected to commence on 3 October 2025.

3.7.1 Implementation Tasks for Operation Phase

Registration of Sender IDs and SIDOs during Operation Phase

81. Applications for new Sender IDs will continue to be processed on a First-Come-First-Served basis when the Registry moves to its Operation Phase.

82. Organisations requesting Sender IDs during this phase will submit their applications online and will need to satisfy the eligibility criteria set out in ComReg 15/136R4. OPAs and Participating MSPs with directly connected SIDO customers may also submit Sender ID applications on behalf of organisations.

83. All applications for Sender IDs and SIDOs will be checked by ComReg and validated as appropriate. ComReg will make the final decision in relation to the registration of valid Sender IDs and SIDOs.

Transmission of SMS messages during Operation Phase

84. When an SMS bearing a Sender ID is transmitted by an OPA during the Operation Phase, downstream PAs and Participating MSPs must check the Sender ID of SMS message received and:

   - If the SMS Sender ID is registered correctly and received from a registered upstream PA or registered MSP, transmit the SMS message towards the end user, or

85. If the SMS Sender ID is not registered or is a registered Sender ID but sent by a source other than (i) a directly connected and securely authenticated SIDO registered for that Sender ID or (ii) a Participating Aggregator or a Participating MSP, then the Participating MSP or PA must block onward transmission of the SMS message.

86. PAs and MSPs will need to adhere to all of the processes set out in the Registry documentation[28] including, but not limited to, management and updates of Registry lists.

3.7.2 Communications Tasks for Operation Phase

87. During this phase some SMS messages will be blocked. Consumers and businesses will need to be made aware that this is happening and why.

88. With direct links to consumers, MSPs need to directly inform their mobile customers that SMS messages with unregistered Sender IDs will be blocked.

89. Aggregators and MSPs with direct connections to SIDOs will also need to continue to inform organisations of the need to register Sender IDs.

90. ComReg will supplement these communications to consumers and SIDOs in the Operation Phase.

91. Table 4 sets out the implementation and communications tasks for the Operation Phase.

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[28] To be made available by ComReg in due course.

Operation Phase			
Type	**What are the tasks?**	**Indicative Timeframe**	**Outputs/Resources**
Implementation	**SIDOs to:** • Register Sender ID (if not already registered) or risk losing current Sender ID • Submit SIDO and SMS Sender ID applications via online Registry Portal	From End March 2025 (provisional)	Sender ID and SIDO applications
	MSPs and PAs to: • Check all SMS Sender IDs received. If Sender ID is properly registered and sent via an approved route, transmit onwards to end user. If Sender ID is unregistered or sent via an unapproved route, block the SMS message. • Where PA is acting as OPA, verify registration of Sender ID against securely authenticated SIDO before forwarding the SMS message and block otherwise. • Record and submit monthly metrics to ComReg in line with D14/24 • Submit Sender ID applications on behalf of SIDOs as needed	From 3 Oct 2025	Transmit SMS message with correctly registered Sender IDs. Block SMS message with unregistered Sender IDs or those from unapproved route. Monthly metrics submission Sender ID applications
	ComReg to: • Check and validate Sender ID applications on a First-Come-First-Served basis	From 3 Oct 2025	Sender ID and SIDO Registrations
Communications	**MSPs to:** • Inform consumers of the upcoming changes to SMS	From Q3 2025 onwards	Customer care awareness/training, direct communications to consumers (e.g., emails, bill inserts, newsletters), social media campaigns
	OPAs (and Participating MSPs who are also OPAs) to: • Continue to inform SIDOs of the need to register Sender IDs	Now	Direct communications e.g., letters, emails, phone calls to SIDOs

Operation Phase			
Type	**What are the tasks?**	**Indicative Timeframe**	**Outputs/Resources**
	ComReg to: • Updated consumer focused communications campaign • Update consumer information on ComReg website • Continue SIDO targeted communication campaign	From Q3 2025	Media assets Updated website

Table 4: Implementation and Communications Tasks for the Operation phase

4 Next Steps

92. The next steps for the project are:

- ComReg and the SMS Technical Sub-Group to continue to progress the development and implementation of the Registry.

- ComReg to communicate with Aggregators and MSPs on engaging early in the Registry work (Q4 2024).

- Bulk Upload of existing Sender IDs and SIDOs to be completed by 20 December 2024. ComReg to check and validate Sender IDs and SIDOs as appropriate in Q1 2025.

- Sunrise phase provisionally expected to commence at the end of March 2025.

93. ComReg looks forward to industry's continued commitment and cooperation on this project.

Annex 1 - Definitions

"Participating Aggregator ("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 (Mobile Service Provider) 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;

"Securely Authenticated" means the process of verifying the identity of the SIDO using technical means such as a secure username/password combination or other cryptographic means;

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

"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 an PA rather than send them directly;

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

"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.

Annex 2 - Sender ID Format requirements

A.1. Sender IDs must be alphanumeric and in compliance with the following:

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

- contain only permitted characters:

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

- not contain any 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;[29]

- 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;

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

- be in any combination of upper and/or lower case;

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

- not be sensitive, offensive or obscene in nature;

- not contain leading or trailing spaces;

- not be likely to cause confusion.

A.2.   Permitted Network Dialable (short) Numbers, which are free to call and have already been assigned to the holder, that may be registered as a Sender ID are:

- Customer Support Short Codes (19XX);

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[29] See Section 6 of ComReg 15/136R4

- European Emergency Services (112) and National Emergency Services (999);

- Harmonised Codes of Social Value (116XXX).