

September 8, 2022

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Director-General (Telecoms & Post)

Deputy Chief Executive (Connectivity Development & Regulation)

Infocomm Media Development Authority

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Re: Alibaba Cloud (Singapore) Private Limited's Feedback Statement on the *Proposals to Strengthen Safeguards for SMS Messages to Singapore Users : Implementation of Anti-Scam Filter Solution Within Mobile Networks*

Contact details:

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1. Summary of major points

See point 3 below.

2. Statement of interest

Alibaba Cloud (Singapore) Private Limited (“Alibaba Cloud”) offers SMS aggregator services in Singapore and has been registered with IMDA/SGNIC in respect of the existing SMS SenderID regime. In general, Alibaba Cloud has concern for the Implementation of Anti-Scam Filter Solution Within Mobile Networks. Please see details below.

3. Comments

We understand that Implementation of Anti-Scam Filter Solution Within Mobile Networks (“Anti-Scam Regime”) is applicable to Mobile Network Operators (“MNOs”) only. We would like to know if an SMS aggregator, at its option, can implement anti-scam filter as well. Our concern is, if MNOs, which are the upper stream service provider of SMS aggregator, screen out unlawful data of a SMS aggregator, by implementing Anti-Scam Filter Solution, MNOs will terminate the whole SMS channel of such SMS aggregator. However, an SMS aggregator has many customers and not all customers are involved in the transmission of unlawful information, the termination of the transmission channel would adversely affect many of our lawful customers. So we propose to a) allow SMS aggregator, at its own option, to implement Anti-Scam Filter Solution as mentioned in this Anti-Scam Regime; or b) require MNOs to communicate with SMS aggregator and allow SMS aggregator to terminate the unlawful customer by itself, rather than terminate the whole transmission channel that is used by such SMS aggregator.