

**PUBLIC CONSULTATION ISSUED BY THE INFO-COMMUNICATION  
MEDIA DEVELOPMENT AUTHORITY**

**ON**

**PROPOSALS TO STRENGTHEN SAFEGUARDS FOR SMS MESSAGES  
TO SINGAPORE USERS: IMPLEMENTATION OF ANTI-SCAM FILTER  
SOLUTION WITHIN MOBILE NETWORKS**



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## **Introduction**

1. M1, a subsidiary of Keppel Corporation, is Singapore's first digital network operator, providing a suite of communications services, including mobile, fixed line and fibre offerings, to over two million customers. Since the launch of commercial services in 1997, we have achieved many firsts – becoming one of the first operators to be awarded one of Singapore's two nationwide 5G standalone network license, first operator to offer nationwide 4G service, as well as ultra high-speed fixed broadband, fixed voice and other services on the Next Generation Nationwide Broadband Network (NGNBN).
2. M1 welcomes the opportunity to review and submit our comments to the IMDA's public consultation on "Proposals to Strengthen Safeguards for SMS Messages to Singapore Users: Implementation of Anti-Scam Filter Solution Within Mobile Networks" ("Consultation"). We share the same concerns as IMDA on the threat of scams that the public is facing, which includes our subscribers.
3. As cited in IMDA's press release issued as part of IMDA's Consultation, the telcos (including M1) have been working with the authorities to implement various measures to offer greater protection against scams. Other initiatives include working with the authorities to suspend or terminate the service lines that are used for scam purposes, and establishing outreach to our customers, such as providing scam advisories on our website and a dedicated hotline for our customers to alert M1 of a scam incident.
4. Notwithstanding the above, M1 wishes to emphasize that any intended measures to combat scams must be proportionate and relevant, and not result in other unwarranted repercussions. As scams will continue to evolve with new tactics and techniques, a concerted response, including having a discerning and vigilant public, will build a more effective and sustainable protection against scams.
5. M1's views on the IMDA's Consultation are set out further below.

## **M1's views on the Consultation**

6. M1 notes that IMDA is proposing that an anti-scam filter solution be implemented by the telcos in Singapore in a phased approach given that, *inter alia*, technology to identify and filter potential scam SMS messages is now commercially available.

### **Deployment of anti-scam filter solution needs to be carefully managed**

7. While there is technology to support identification and filtering of scam messages, and such solutions are deployed in Australia and United Kingdom to block scam SMS messages at the



network level, we understand that the anti-scam filter capabilities are generally in their early stages of development.

8. The implementation of an anti-scam filter solution should not be seen as a straightforward, off-the-shelf solution deployment as such implementation will also require integration with other elements within the mobile network, hence the deployment needs to be carefully managed. Further, the scam threats and the counter measures are expected to vary between different countries. Therefore, it is also necessary for our implementation to account for local scam threats and the existing counter measures that are put in place.
9. M1 has been working with the authorities to implement, amongst others, measures to block scam SMS. Notwithstanding, we are also assessing the capabilities of anti-scam filter solutions and their implications. Given the large volume of SMS and its ubiquitous usage, the use of anti-scam filter solutions could degrade the SMS delivery performance.

Public concerns over data privacy and buy-in

10. Some members of the public may be concerned over the deployment of anti-scam filter solutions and scanning of SMS messages for suspicious content.
11. While we note that IMDA has explained in its Consultation paper that the anti-scam filter processes are generally machined-based, SMS messages will be anonymized, and that telcos are expected to comply with the Personal Data Protection Act, we are of the view that public awareness and support for such measure would still be necessary. This will also help to raise the overall awareness and vigilance of the general public to combat against scams.