



14 September 2022

Twilio Singapore PTE Limited  
regulatory-notices@twilio.com

Info-Communications Media Development Authority, Singapore

By Email

**Subject: Twilio response to the Public Consultation on Full SSIR Regime**

Dear Ms Aileen Chia,

This is with reference to the Public Consultation on Full SSIR Regime, released on 15 August 2022.

In this regard, please find enclosed, Twilio Singapore PTE Limited response to the proposed Full SSIR regime.

We hope our submission will merit your kind consideration and support.

Yours faithfully

A handwritten signature in blue ink, appearing to be "W/C", written over a white background.

Donald Connor  
Senior Director, Telecommunications Regulatory Compliance



*Confidential Version*

## ***Consultation: Full SSIR Regime***

*Twilio's Response to the Public Consultation by the Info-communications Media Development Authority of Singapore*

14 September 2022



## 1. About Twilio

- 1.1 As a leading global Communications Platform as a Service (**CPaaS**) provider, Twilio provides services to more than 235,000 enterprises globally and powers more than 1 trillion interactions between them and their customers every year.
- 1.2 Twilio's software allows customers to communicate with their customers over thanks to the communications feature that companies have added into applications across a range of industries, from financial services and retail to healthcare and non-profits.
- 1.3 For instance, Twilio powers the communications for New York City's contact tracing initiative. The services enable city authorities to communicate with COVID-19 patients, educate them on the virus, and identify their close contacts through self-reporting. The platform also provides messaging-based alerts using Twilio Voice, SMS, email or WhatsApp that prompt patients to fill out secure surveys on their symptoms.
- 1.4 In the Asia Pacific region, Twilio serves corporate customers as well as Government organisations and many of Twilio's customers are also small and medium-sized enterprises and Twilio's non-profit arm, [Twilio.org](https://www.twilio.org), supports charitable organisations to deliver their communications needs.

## 2. Executive Summary

- 2.1 Sender IDs are key to our customers and the communications platform as a service we provide them. Our customers rely on them to identify themselves to the persons they message. Parties receiving messages want to know that the person that is messaging them is who they say they are. Our customers view Sender IDs as an important identifier that supports their businesses and brands. Twilio is acutely aware that in order for our customers' businesses and brands to flourish, trust in Sender IDs is required by the entire ecosystem - businesses that send messages, persons that receive messages, and aggregators that facilitate these exchanges.
- 2.2 Twilio fully supports the Info-communications Media Authority's (**IMDA**) desire to protect the residents of Singapore from spoofed SMS using SenderIDs and is pleased to provide comments to the consultation on the proposed requirement of pre-registration of SenderIDs under the Full SSIR regime.
- 2.3 Please do not hesitate to refer any questions or remarks that may arise as a result of our comments to:

Twilio Singapore Pte. Ltd.  
8 Marina Boulevard #05-02  
Marina Bay Financial Centre  
Singapore 018981

**Attention:** Global Telecommunications Team  
**Email:** [regulatory-notices@twilio.com](mailto:regulatory-notices@twilio.com)



### 3. Twilio's Comments

3.1 Clause 9 of IMDA's proposal states that under the Full SSIR regime:

*only registered Sender IDs can be used, and all non registered Sender IDs will be blocked as a default.*

In this regard, we would request that IMDA clarify if only one list of protected Sender IDs (Whitelist) shall be provided by IMDA periodically to aggregators. Any Sender ID set out in the Protected List will be allowed while any other SenderID will be blocked and thereby there is no concept of a denied Sender ID list (blacklist).

Furthermore, considering that IMDA is proposing to make Sender ID registration a requirement for organisations that use Sender IDs, this will be a herculean task not only for organisations that will need to register their Sender IDs but also aggregators that will need to undertake manual document precheck. While we welcome the 2 months proposed transition period, we request IMDA to provide an adequate time for the participants in the Sender ID ecosystem to implement the provisions in the Full SSIR regime.

3.2 Clause 11 of the IMDA's proposal states that under the Full SSIR regime:

*registration requirement applies to any alphanumeric Sender ID chosen by Organisations to appear as headers in their SMS*

While we note that it is required for Organisations to register and protect their Sender IDs, we would like to submit that in order to ensure compliance to the registration of headers assigned to Organisations, it is also necessary to frame the rules for the assignment of headers uniformly across the system (e.g., one such rule could be the total length of a SMS Header will be 11 characters which will include alphabets or numbers or combinations as alphanumeric and preferably uppercase only). We request that IMDA provide clarity on the header specification proposed under the Full SSIR regime as this will be necessary for the development in the technical systems of aggregators.

3.3 Clause 15 of the IMDA's proposal states that under the Full SSIR regime:

*foreign-based businesses to set up local subsidiaries or foreign branch offices in Singapore by registering with ACRA.*

IMDA's proposal would require foreign businesses to either register as a local subsidiary or foreign branch office. We believe that limiting SenderID registration exclusively to locally registered companies will limit the impact of the Full SSIR regime on consumer welfare by shifting spoofed SMS from Sender IDs to international mobile telephone numbers. As such, Twilio suggests that IMDA should allow foreign companies to register Sender IDs. IMDA has implemented this approach in relation to



IP Telephony services that require a Licensee to use its best efforts to verify the identity of subscribers not based in Singapore through appropriate documents.<sup>1</sup>

Twilio, therefore, humbly requests that IMDA amend these provisions in order to allow foreign companies to register Sender IDs in Singapore.

- 3.4 Clause 17 of the IMDA's proposal states that organisations will pay a fee to register their Sender IDs. The current fees consist of: (a) one-time set up fee of \$500; and (b) \$1,000 a year for up to 10 Sender IDs. While such fees may be appropriate for large commercial organisations that were the subject of the original Sender ID registry, the Full SSIR regime will require the registration by charities, NGOs and SMEs. As such, the registration fee may be a deterrent to registration and may discourage organizations to adopt the Protected SenderIDs. Twilio, therefore, humbly recommends that the fees be reviewed by giving due consideration to the type of organizations that are registering a Sender ID and their annual revenue.

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<sup>1</sup> [Specific Terms and Conditions for IP Telephony Services](#) that states in section 4.3(b) that: *where the subscriber is not in Singapore, the Licensee shall use its best efforts to verify the identity of the subscriber through appropriate documents that are recognised by the authorised establishments in the country of purchase*