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Infocomm Security and Trust Division
Infocomm Development Authority of Singapore
8 Temasek Boulevard
#14-00 Suntec Tower Three
Singapore 038988

Dear Sir

Public Consultation on AO Framework

Please refer to the above dated 29 August 2008.

Thank you for the opportunity to participate in the public consultation on Proposed Enactment of Legislation Framework to Regulate Authentication Operators in Singapore.

Our views on the consultation paper are as follows:

1. Light-touch accreditation framework may restrict interconnectivity.

In our opinion, a light-touch accreditation framework where AOs may voluntarily subject themselves to comply with stipulated accreditation requirements and seek endorsement under the legislation may restrict interconnectivity on equitable basis amongst AOs and Service Providers.

We believe accredited AOs wishing to serve key economic sectors are likely to install tighter security platforms to perform higher standards of operations compared to AOs wishing to provide their services only to non-critical sectors or small pockets of demand. As such, interconnectivity between accredited and non-accredited AOs may be restricted to achieve that of the weakest link.

We believe a stronger regulatory regime requiring all AOs to be accredited will be more effective in creating a more harmonic and secured environment for the inter-exchange of information or credentials. Key economic sector regulators may still impose additional requirements on the accredited AOs accordingly.



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2. Prescribing a competition code to prevent anti-competitive behaviors.

As this is a new market, we believe there is a need to prescribe a competition code on the onset to achieve legal certainty in the accreditation scheme.

3. Face-to-face registration supports stronger authentication process.

On the issuance of credentials, we believe all AOs should provide means for face-to-face interaction and validation where end-users may submit proof of identities such as photo-identities plus any other relevant documentation to the AOs during the registration process.

We believe that this stipulated requirement will form a basis for a stronger authentication trust between the AOs as well as between the end-users and the AOs.

In summary, we believe regulating authentication operators via a strong accreditation process will achieve a balance between public confidence in using any AOs, tighter security interconnections between the AOs, and AOs wishing to undertake additional requirements to serve key economic sectors.

In addition, we also believe that a face-to-face registration process between the end-users and AOs will support a stronger authentication process and promote higher trust-equity between the end-users and AOs.

We hope that above comments and suggestions will assist IDA to formulate a fair and equitable framework for the use of two or more factors of authentication.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Lawrence Han".

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