



SINGAPORE TELECOMMUNICATIONS LTD

RESPONSE TO CONSULTATION PAPER: ENACTMENT OF A LEGISLATIVE FRAMEWORK TO REGULATE AUTHENTICATION OPERATORS IN SINGAPORE

1. COMMENTS

- 1.1. SingTel provides the following comments on the needs of central issuance and distribution of credential. SingTel submits that distributed management of credential would not meet the needs of the following:

Information System acquisitions, development and maintenance

- 1.2 The need for vulnerability scanning of Internet-facing system once every 3 months assumes that the Authentication Operator (AO) interfaces with the Service Provider at the Internet level. We note that in practice, these are dependent on the technology(s) deployed by the AO. Hence, the requirements outlined by the IDA in its Consultation could be rendered invalid or unnecessary.

Reporting

- 1.3 The format of reporting outlined in the Consultation requires information that pertains to central management of credential such as:
- number of end-users subscribed to AO;
 - number of active end-users; and
 - number of credentials issued etc
- 1.4 These are sensitive information that normally kept by the financial institutions themselves. AOs do not normally have access to such information and hence, it would not be feasible for the AOs to provide reports containing such information.

2. CONCLUSION

- 2.1 In summary, SingTel acknowledges the need to have a legislative framework to regulate AOs in Singapore. However, SingTel submits that the framework should be a guideline for operating the service, rather than dictating how the service should be carried out (eg central management of credential) and dictating the format of the report.