

Thanks for a comprehensive review of this problem.

Let me focus my comments on my disagreements with your proposed solution.

1. Enforcement. You are relying on ISPs to enforce against spam. This may leave an enforcement gap: many email users access the Internet through corporate networks, rather than ISPs. Further, relying on ISPs may lead to a "free rider problem". Smaller ISPs may rely on the larger ones to take civil action. I recommend that spam be made a criminal offence as well as subject to civil action.

2. Opt-Out. I've tried "opt-out" from Singapore sources on two occasions, and in both cases, the source just continued to spam me. Your proposal relies on education, civil action, etc. But, we are dealing with wily people, with whom "education" is not a solution. I recommend an "opt in" framework.

3. Foreign sources of spam. We should extend our law to foreign sources of spam. For the time being, enforcement may be difficult. But, this would provide an avenue for Singapore ISPs and other enforcers to cooperate with authorities in the U.S. and elsewhere.

Yours sincerely,

Ivan Png