

Hi,

I have some comments regarding the Anti-spam paper.

1. The right to sue for damages should not be limited to ISPs, as there are many other email service providers who may not be ISPs but are also victims of spams.
2. The definition "Unsolicited commercial email messages" is too wide. I think it should be limited to "unsolicited commercial bulk email messages" (which you have clarified in para 7) sent to unrelated parties. For instance, If an association send an sponsored emails to its members with which they have a relationship, it should not be considered as a spam, provided members can opt-out.
3. I support the proposed approach to allow legitimate marketer to send unsolicited emails as long as the comply with the opt-out and other requiremenets set up in the paper. This is necessary to promote e-commerce or other e-applications in Singapore.
4. I support all the requirements in para 11 and 12 except 12 (b) that requires the inclusion of [ADV] in the subject. As acknowledged, 77% of SPAMs originated from overseas. This requirement will put the local marketers in a disadvantaged position vs their overseas competitors. Most people will just use the filtering features e.g. in outlook to filter out these emails based on subject heading.
5. I do receive a lot of unsolicited emails from IDA, Spring Singapore, NUS, IBM, etc. to attend talks/seminars or to promote something, and I don't mind receiving some of them as they are relevant to me. So long as I have the option to click a workable unsubscribe button.
6. I think legislation should be in place to get the ISPs to scan outgoing mails for viruses (not as a paid option) and to detect spamming activities from them.
7. If a person exchange name card with another person and subsequently that other person include his name in his company's newsletter, this should not be considered as "unsolicited".
8. What should be considered "commercial"? In business, the communication is either commercial or personal. I will be thankful if someone tells me a "lobang" where I can avoid paying \$3 per minute to Singtel or Starhub for roaming in China (and yes I just found out this service from a friend where I only need to pay \$.35 per minute! And I "spam" this information to a group of business friends and they are all very thankful!).
9. SMEs do not have the mussels of the big guys in advertising, and email marketing is one effective way they can reach their customers as long as it is done professionally. So, don't kill SMEs!
10. Should it apply to emails sent from Singapore? It is irrelevant. You can send emails from anywhere in the world regardless of your physical location. However, the service providers in Singapore have to comply with the guidelines and requirements.
11. I certainly support opt-out regime for spam control. Very few people will opt in and commercial activities will be dead except those originated from overseas.

Regards,
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