

I highly applaud IDA's proposal on this Framework for the Control of E-mail Spam. For many of us who have had to deal with spam, we look forward to future spam-free days.

However, there is one major point that may dull the effectiveness of this legislature: That which requires the end-user to 'opt out' of receiving spam. As defined, spam is 'Unsolicited Commercial E-mail'. This first email received offering you an opt out, is in fact unsolicited - this makes it spam. The fact that the initial spam mail is already received is nuisance enough, not to mention the possibility of any malicious intent when the recipient attempts to opt himself out. Spammers will not use the same account to send spam repeatedly; they change accounts everytime they spam. This makes it possible to claim that each spam is the first. Not only that, opt out mechanisms can serve the exact opposite of its published intent - instead of opting you out of future emailings, it serves to confirm the currency of your email account, thus making you a potential target for future spam. This information is highly valuable to an entire parallel industry; email address harvesters, who will compile latest lists of valid email addresses for sale. This certainly does not bode well for those of us who diligently try to opt ourselves off every spam we receive.

Having the opt out philosophy will further encourage illegal harvesting of email addresses either from websites or other means, which correspondingly makes the spam problem worse, not better. Of course this does not mean illegal harvesting does not occur now, but if the converse philosophy were true - i.e. opt in, then spammers using illegally obtained email addresses will clearly be liable for prosecution when their spam email reaches non-opted-in persons. This will however not be the case in our currently proposed opt out scenerio.

I'd like to propose instead an opt in policy - one where email users can 'subscribe' to 'advisory' email according to their interests. This is surely target marketing for those wishing to send commercial email and involving much lower cost for everyone downstream from the sender - the ISP, the companies, the users. This registry can be hosted by the company or group of companies offering collective services, or by 'Yellow Pages' type organisations who may charge companies a small fee to use their database, or by ISPs (some already do) as a service to their subscribers. This gets the advisories to those who really want it, leaving the rest in relative peace (since there is spam from other countries we have to deal with).

This model certainly works as evidenced by companies who provide goods and services. They send you email after you register your product with them and agree to receive regular product updates. Best part is recipients will certainly not complain of having received spam, and will gladly review and even make future purchases based on these e-mailings. This is the certainly the preferred way email and web users wish to experience the internet.

I don't know if I have been persuasive enough, and I certainly lack hard facts. However, I do hope that together with the rest of my fellow Singaporean email users who wish a review of the opt out policy, we can persuade IDA-AGC to re-consider an opt in policy instead.

Best Regards
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