

**FEEDBACK ON THE PROPOSED SPAM CONTROL BILL AS
SUBMITTED BY THE SINGAPORE MANUFACTURERS'
FEDERATION (SMa)**

In general, from our experience, spam emails from Singapore companies are minimal. Most of the spam emails we get tend to be from overseas companies. The Spam Control Bill does not cover this. Below are our further comments on particular issues.

Unsubscribe feature

Comment: The unsubscribe feature is good. However, if by sending an unsubscribed mail means confirming that the recipient is a “live” account, it could subject the receiver to further spam through other loop holes or means. Many recipients would rather choose to delete rather than to unsubscribe.

Clause 3.11

Comment: The volume specified under (a), (b) and (c) should not apply to business organisations. Because such business organisations would not be able to send training seminar circulars to its members, if the limit is 100 per day, 1000 per 30 days, etc.

Clause 3.14 Clause 7 (1):

Comment: To apply the proposed Bill and law in Singapore only will subject Singapore to spam attacks from neighbouring countries such as Malaysia and Indonesia or even India and China. Because through out-sourcing, commercial spam can be sent from overseas.

Government Agencies are excluded from this law.

Comment: We would like business organisations like ours to be excluded from the spam law also. This is because the nature of our work requires us to communicate with our members and the public. Like IE Singapore, we also organise trade missions and trade fairs. Like EDB, we need to communicate with our members on industry issues such as industry safety, industry fire protection issues etc. Similarly, like IDA, we need to communicate with our members on eSCM, e-business, Cold Chain or RFID issues.

Person Liable for Spamming

Comment: We wonder how it is possible to ascertain who is responsible for the spamming? Most IT departments would be the culprits doing the broadcast. And they would be given instructions from another department. In the end, it may involve many members of a firm's staff.

Reference: Part 2.1 (a-d) Legislation as part of a multi-pronged approach

Comment: Industry self-regulation may prove to be far too broad within the multi-pronged platform. Perhaps we should consider breaking down to "Provider Co-operation" (ISP / Developer) and "Initiator Education" (Marketing / End-Users).

Reference: Part 3. Key features of proposed spam control bill 3.10 **Application of the proposed Bill**

Comment: Labelling will eventually be perceived as a de-facto acceptance for all kind of spam mail and users, which utilising auto-directing software in their mail handler software will have all <ADV> tag route to the bin including mail that is in their interest.

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