

To:

Mr Andrew Hairc
Deputy Director-General (Telecoms)
Infocomm Development Authority of Singapore
8 Temasek Boulevard
#14-00 Suntec Tower Three
Singapore 038988

Comments on IDA's public consultation for its draft Code of Practice for Provision of Premium Rate Services

Referring to Proposed Code of Practice, 2.8.2.

I refer to example B, where each chat SMS sent to the end-users need to include the charge in every SMS sent to the end-users. Having the charge on each chat SMS would seriously reduce the excitement of chatting experience. It would make end-users feel that the chat SMS comes from a machine, instead of a person-to-person chat.

The charge for SMS are already included in the confirmation message and the daily membership SMS. In this manner, end-users are already informed on a daily basis on the charges for SMS. I believe a once-a-day SMS to inform customer on the chat SMS charges would be sufficient, and serve to enable end-users to enjoy the chatting experience better.

Since 2004, we have not had a single end-user who complained not knowing that there will charges for each SMS sent and SMS received. It has been the "norm" in the Singapore SMS chat market that SBO charges for each SMS sent and SMS received.

From our experience in Malaysia, where MCMC established the same ruling as in 2.8.2, where the charges need to be included in every SMS sent to end-user. As a result, the SMS chat service performance dropped to levels, which led to terminate the service and the short-code as well. As far as we know, there is none active SMS chat service operator in Malaysia at this moment, which directly resulted from this ruling by MCMC.

All our SMS chat services are a 1-to-1 type, which means every 1 SMS sent in by the end-user, he/she will only receive 1 SMS in return.

Summary

Instead of having the charges stated in every SMS chat sent to the end-user, we would propose sending a daily message (this message is free of charge) to inform the end-user of the charges for the service.

Finally, if IDA insist of this ruling, it will definitely kill-off the entire SMS chat market in Singapore, which has no more than 4 active SMS chat SBO at this moment.

Sincerely,

Bob Tang
Truc Mobile Pte Ltd

