



**SINGNET PTE LTD AND  
SINGTEL MOBILE SINGAPORE PTE LTD**

**SUBMISSION TO THE MEDIA DEVELOPMENT AUTHORITY OF  
SINGAPORE**

**IN RESPONSE TO THE**

**PUBLIC CONSULTATION -  
REGULATORY OPTIONS TO FACILITATE THE ADOPTION OF INTERNET  
PARENTAL CONTROLS**

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**RESPONSE TO MDA PUBLIC CONSULTATION -  
REGULATORY OPTIONS TO FACILITATE THE ADOPTION OF INTERNET  
PARENTAL CONTROLS**

**1. INTRODUCTION AND STATEMENT OF INTEREST**

- 1.1. This submission sets out the response from SingNet Pte Ltd (“**SingNet**”) and SingTel Mobile Singapore Pte Ltd (“**SingTel Mobile**”) to the request for comments from the Media Development Authority of Singapore (“**MDA**”) consultation on the Regulatory Options to Facilitate the Adoption of Internet Parental Controls (“**Consultation**”).
- 1.2. SingNet is a leading Internet access service provider (“**IASP**”) in Singapore and has been at the forefront of Internet innovation since 1994, being the first IASP to launch broadband services in Singapore. SingTel Mobile is also an IASP in Singapore providing Internet services to its mobile customers.
- 1.3. As IASPs, SingNet and SingTel Mobile are required under the MDA’s Broadcasting (Class Licence) (“**Class Licence**”) to inform and offer optional Internet filtering services to its customers, and to provide technical support in relation to such optional Internet filtering services.
- 1.4. SingNet and SingTel Mobile’s submission in response to the MDA Consultation is structured as follows:

Section 1 – Introduction

Section 2 – Executive summary

Section 3 – Detailed Comments

Section 4 – Conclusion

## 2. EXECUTIVE SUMMARY

- 2.1. SingNet and SingTel Mobile support the MDA's decision to issue the Consultation for public comments. As IASPs, SingNet and SingTel Mobile appreciate the opportunity to provide our views and comments.
- 2.2. We support the MDA's view that public education and parental supervision should be the key tenets in addressing the challenges in relation to the protection of the young from potentially harmful content available over the Internet. We place great importance on Internet safety and we have actively sought to educate parents on adopting safe online practices for the protection of children. We regularly participate in annual events such as SmartKids Asia. We also offer a range of parental control and filtering services, which we promote in popular parenting magazines and online forums. Furthermore, SingNet and SingTel Mobile have also chosen cyber wellness as one of the core focal areas in our corporate social responsibility and community support programmes. We will be pleased to work with the MDA and other relevant bodies to create and strengthen the awareness for parents to protect their children from such harmful content.
- 2.3. SingNet and SingTel Mobile recognize the wish for safe Internet usage by customers. As such, we offer tools for our customers to filter undesirable content from their Internet usage, e.g. filter out adult content. We also comply with the MDA requirement to protect societal values by restricting public access to a limited number of mass impact websites which contain content that the community regards as offensive or harmful.
- 2.4. However, we are concerned that the MDA's latest proposed approach to the regulatory options to facilitate the adoption of Internet parental controls appears to place an overly onerous responsibility on IASPs. We would note that IASPs are licensed by the Info-communications Development Authority ("IDA") to provide Internet access services to customers. The current requirements under the Class Licence already require IASPs to inform and offer optional Internet filtering services to its customers, and to provide technical support in relation to such optional Internet filtering services. In our view, the MDA's proposed approach imposes additional regulatory requirements on IASPs which are not warranted and are onerous.

2.5. Our views are presented below. In summary,

- (a) Both SingNet and SingTel Mobile actively support any measure that is appropriate for the general well-being of the Internet community to the extent that they are feasible, practical and do not unreasonably shift the burden onto specific parties.
- (b) SingNet and SingTel Mobile propose that the MDA retains the use of Option 1.
- (c) Where the MDA intends to use Option 1A, we have presented our views and concerns. Given the level of concerns associated with this option 1A, we ask that the MDA consult further on the actual operation of this option 1A and to ensure that the option does not pose operational difficulties for the IASPs before it is implemented.
- (d) We do not support the use of Option 2. An opt-out framework is completely contrary to the changes that the regulatory authorities have put in place. The option also has the effect of confusing the offering of Internet parental control services by default with actual usage and of providing a sense of false security to parents and customers.
- (e) We believe that IASPs should be free to determine the features and functionalities of the Internet parental control service.
- (f) IASPs should be given the flexibility in deciding what solutions they want, whether a network-level solution, a device-based solution or in fact a combination of both (if such a combination works well and delivers the result needed).
- (g) Internet parental controls should remain as a chargeable value-added service to customers who genuinely wish to subscribe to such services. IASPs will have to recover the cost by increasing the prices of their Internet access services, which will be to the detriment of the majority of customers.
- (h) SingNet and SingTel Mobile propose that IASPs be allowed to continue providing the relevant technical assistance to all customers who require such assistance.

- (i) SingNet and SingTel Mobile would be pleased to work with the MDA and other relevant bodies to create and strengthen the awareness for parents to protect their children from harmful content. These programmes should help to educate children about the harm of accessing harmful content especially content on pirated sites which generally contain pornographic material.
- (j) SingNet and SingTel Mobile believe that, parents can support their child's Internet safety by sharing a positive experience of Internet use with them and teaching them the right behavior when going online.

### **3. DETAILED COMMENTS**

#### Subscription Process for Internet Parental Controls

- 3.1. SingNet and SingTel Mobile do not agree with the MDA's view that most parents are generally unaware of the availability of Internet parental control services, or that the subscription process for Internet parental controls is cumbersome or discourages take-up by customers.
- 3.2. Parents are well aware of the availability of Internet parental controls currently offered by SingNet and SingTel Mobile, e.g. SingNet currently offers its Security Suite service and its Family Protection service for its fixed-line broadband customers, SingTel Mobile offers its Mobile Internet Filter service for its mobile customers. We note that the take-up for these services has been encouraging over the past few months. The take-up for the Security Suite service has increased by approximately 5% over the last three (3) months, while the take-up for the Family Protection service and the Mobile Internet Filter service has increased by approximately 65% and 20% respectively. We also note that customers today can also avail themselves of other Internet parental controls that may be available on the Internet or via third-party service providers such as McAfee.
- 3.3. Both SingNet and SingTel Mobile actively support any measure that is appropriate for the general well-being of the Internet community to the extent that they are feasible, practical and do not unreasonably shift the burden onto specific parties. For example, both SingNet and SingTel Mobile already comply with the requirements under the Class Licence that requires IASPs to inform and offer optional Internet filtering services to its customers, and to provide technical support in relation to such optional Internet filtering services. We note that the

Class Licence itself requires that the IASPs inform and offer optional Internet filtering services but does not broach an approach that foists upon the customer the take-up of Internet parental controls where the customer, i.e. the parents, do not choose to take-up such Internet parental control services.

- 3.4. We believe therefore that there should not be any further change to the approach that is already in place vis-à-vis the current requirements under the Class Licence. Notwithstanding the above, we have reviewed the options put forth by the MDA and provide our views and comments as follows:

*Option 1: Inform and Offer*

- 3.5. We note that option 1 is the current requirement under the Class Licence. We propose that the MDA retains this option in relation to the offer of Internet parental controls by IASPs. In addition, we will be pleased to work with the MDA and other relevant bodies to create and strengthen the awareness for parents to protect their children from such harmful content.

*Option 1A: Required Decision*

- 3.6. This option 1A requires that consumers be asked whether they want Internet parental controls, and they will have to make an explicit decision at the point of subscription or renewal for fixed-line broadband service or mobile service. We note that this option 1A would not be feasible and practical for the following reasons:
- (a) First, every subscription for fixed-line broadband service and mobile service is already fairly detailed as customers have to sign-up for various items, including price plans, handset choice, value-added services, discuss any other charges that need to be settled as outstanding charges, etc. In some cases, customers could be interested in the relocation of their fixed-line broadband service to another location, whilst others are interested in taking up a fibre broadband service or a pay TV service along with the fibre broadband service. Option 1A will lead to a longer waiting time for customers as our staff will have to:
- Ask the customer whether he/she is interested in subscribing to the Internet parental control service;

- Explain the reason why the customer is being asked for his/her explicit decision on whether to subscribe to the Internet parental control service, i.e. it is an MDA requirement for IASPs to inform and obtain the customer's explicit decision;
  - Explain the Internet parental control service to interested customers;
  - Allow customers to consider whether they wish to subscribe to the Internet parental control service (since customers may have gone to the retail shop for other service requests and had not intended to subscribe to the Internet parental control service in the first place); and
  - Assist interested customers in subscribing to the Internet parental control service or proceed to obtain the customer's explicit decision not to subscribe to the Internet parental control service.
- (b) As the MDA would note, the sequence of events described above would increase the waiting time significantly for all customers. Even if some interested customers eventually subscribe to such services, other customers would have been greatly inconvenienced, especially customers who do not require such services at all, i.e. customers who do not have any young children or exercise their own parental supervision on their young children.
- (c) Furthermore, some customers may perceive this option to be an infringement of privacy, e.g. customers who are not married and/or do not have any children. Some customers may not be aware of or convinced that it is an MDA requirement to obtain the customer's explicit decision, our staff will have to engage such customers separately which will also lead to further delays in serving customers.

- 3.7. We would caution against taking such an approach which may only be beneficial (if at all) to a small group of customers. In fact, we note that only approximately 28% of households in Singapore have children aged 14 years and below. It is our view that it would be more effective and efficient to create and strengthen the awareness for parents rather than impose a regulatory requirement that affects all customers.
- 3.8. We note however, that the MDA is reviewing this option 1A. Given the level of concerns associated with this option 1A, we ask that the MDA consult further on the actual operation of this option 1A and to ensure that the option does not pose operational difficulties for the IASPs before it is implemented.

*Option 2: Opt-Out*

- 3.9. With this option 2, Internet parental controls will be switched on by default at the point of subscription or renewal unless instructed otherwise by the customer. We share the MDA's view on this option 2, i.e. there is a risk that such an approach will lull parents into a false sense of security without fully understanding the constraints of Internet parental controls.
- 3.10. SingNet and SingTel Mobile also do not support the MDA proposal to offer Internet parental control services as a default service where customers are required to opt-out as this is contrary to the prevailing regulatory and legislative changes put in place by various agencies.
- 3.11. In 2009, the Consumer Protection Act (Fair Trading) (Opt Out Regulations 2009) was implemented requiring service providers to obtain express consent from their customers for the services that they offer, including consent for prices, terms and conditions. The IDA's Telecom Competition Code also requires that telecommunication service providers obtain agreement from end-users for the charges they intend to impose on services offered. Section 3.4.2 of the Media Market Conduct Code 2010 also requires that Regulated Persons only charge subscribers for the specific service that the subscriber ordered. SingNet and SingTel Mobile comply with these requirements for subscription to services.
- 3.12. The MDA requirement to offer Internet parental control services by default and only permit customers to opt-out is completely contrary to the changes that the regulatory authorities have put in place. The option also has the effect of



confusing the offering of Internet parental control services by default with actual usage. There is no correlation with offering the service by default and actual usage. Customers who have been given a service by default may not have required it and may not make use of it, in contrast with customers who actively request for a service and choose to subscribe to it.

- 3.13. To offer an Internet parental control service by default without any usage is clearly a waste of resources and does not ensure that there is sufficient usage or awareness of the Internet parental control service.

#### Categories of Content To Be Filtered

- 3.14. In relation to the MDA's recommendation that "adult content" be filtered by default, it is unclear why the MDA has recommended this in view that there are other types of content available on the Internet which are also potentially harmful to the young, e.g. violence, substance abuse, addictions, etc.

- 3.15. For the MDA's information, our current service offerings are as follows:

- (a) SingNet Security Suite service and Family Protection service – these services allow customers to decide the content categories to be filtered.
- (b) SingTel Mobile Mobile Internet Filter service – this service allows customers to decide the content to be filtered based on age group. There are two (2) pre-defined age groups, both of which filter "adult content" by default.

- 3.16. It is our view that IASPs should be free to determine the features and functionalities of the Internet parental control service.

#### Mode by Which Content Is Filtered

- 3.17. In relation to the MDA's recommendation that IASPs be required to provide network-level Internet parental controls, it is also unclear why the MDA is prescribing the mode of the service offering.

- 3.18. SingNet and SingTel Mobile caution against dictating the type of solution for Internet parental controls. It is always the case that technological innovations happen often and what was regarded as optimal with one decision may actually

be outdated in a short while. Dictating a network-level solution now may actually leave IASPs without an option to offer a device-based solution which could in turn contain certain features that will not be delivered with a network-level Internet parental control solution.

- 3.19. To illustrate, it is reasonable that network-level solutions be required to be tested rigorously to ensure no interference with the network it works on, and to limit any degradation in service levels. Some of the features that are device-based may not be permitted on a network-level solution that is implemented at the IASPs network elements and gateways.
- 3.20. IASPs generally want to be given the flexibility in deciding what solutions they want, whether a network-level solution, a device-based solution or in fact a combination of both (if such a combination works well and delivers the result needed).
- 3.21. The decision to dictate a mandatory network-level solution is also contrary to the technology agnostic approach that has been adopted so far by the MDA. Furthermore, as IASPs are currently required to provide reasonable technical support to the relevant subscriber, it is unclear why the MDA has recommended a mandatory network-level service vis-à-vis a device-based service. A network-level service and a device-based service each have their own advantages and disadvantages. The network-level service and the device-based service offered by SingNet and SingTel Mobile are complementary in providing a complete Internet parental control service for customers.
- 3.22. It is therefore our view that IASPs should be left to determine the type of solution.

#### Cost To Consumers

- 3.23. SingNet and SingTel Mobile are concerned about the MDA's recommendation that IASPs be required to offer Internet parental controls at no charge. We highlight that such Internet parental controls are chargeable value-added services; it is not part of the Internet access service provided by IASPs. SingNet and SingTel Mobile had to make investments and enhancements to their networks and infrastructure in order to offer such Internet parental control services to its customers. It would not be reasonable for the MDA to require IASPs to offer such

services at no charge as there is clearly a cost for IASPs to provide such services. Furthermore, we note that third-party service providers (e.g. McAfee) charge customers for such Internet parental control services.

- 3.24 We would also caution against such an approach as there remains a significant group of customers who do not require such Internet parental control services. Should the MDA impose such a regulatory requirement on IASPs, this would effectively raise the cost of providing Internet access services. IASPs will have to recover the cost by increasing the prices of their Internet access services, which will be to the detriment of the majority of customers. This would be unfair and an unreasonable course of action in the eyes of the general public, many of whom may not require any Internet parental control services at all.
- 3.25 SingNet and SingTel Mobile also believe it is necessary to put in perspective the choices that customers have with regard to Internet parental control service(s).
- 3.26 First, SingNet and SingTel Mobile comply with the MDA requirements to protect societal values by restricting public access to a limited number of mass impact websites which contain content that the community regards as offensive or harmful; this provides a form of ‘protection’ for customers.
- 3.27 In addition, a SingNet customer has the option of taking-up additional filtering service, in the form of its Security Suite service and its Family Protection service for its fixed-line broadband customers at low and affordable subscription rates per month whilst SingTel Mobile offers its Mobile Internet Filter service for its mobile customers. The SingNet Security Suite offers more than Internet filtering; as the MDA can see in the attached slides, it is an anti-spam, anti-spyware, anti-virus, anti-phishing, offers firewall and network security features, and even rates websites for end-users. The parental control features, ie the Internet filtering option, is one of the many features built into this powerful tool. A reasonable cause of action would be for a customer who subscribes to the service it requires and then pay for that service. In this case, a customer who requires a filtering service should subscribe to it [instead of offering the filtering as a default to all end-users, regardless whether they have subscribed to it] and also pay the relevant charge for it.

- 3.28. Again, we caution the MDA against making assumptions that a free service will be more actively used. There is no co-relation with a free service and actual usage. Customers who have been given a service free may not have required it and may not make use of it, in contrast with customers who actively request for a service and subscribe to it.
- 3.29. We strongly urge the MDA not to impose such a requirement on IASPs. Such Internet parental controls should remain as a chargeable value-added service to customers who genuinely wish to subscribe to such services.

#### Provision of Technical Assistance

- 3.30. In relation to the MDA's recommendation on the provision of technical assistance, we note that customers are already able to subscribe to and turn on their Internet parental control services through various channels, e.g. via the web, mobile device and customer service hotline. Customers are also able to obtain technical assistance in relation to the use and configuration of their service via the same channels.
- 3.31. We also refer the MDA to our comments above in relation to option 1A. To complete the switch on of Internet parental controls will also result in a delay in the service provisioning time for customers. Furthermore, depending on the nature of the Internet parental control solution, that process may not necessarily take just a few minutes, e.g. there could be synching with the backend systems.
- 3.32. SingNet and SingTel Mobile propose that IASPs be allowed to continue providing the relevant technical assistance to all customers who require such assistance.

#### Creating and Strengthening Public Awareness

- 3.33. As indicated above, SingTel has chosen cyber wellness as one of the core focal areas in our corporate social responsibility and community support programmes. SingNet and SingTel Mobile would be pleased to work with the MDA and other relevant bodies to create and strengthen the awareness for parents to protect their children from such harmful content.

- 3.34. SingNet and SingTel Mobile believe that, parents can support their child's Internet safety by sharing a positive experience of Internet use with them and teaching them the right behavior when going online. We believe that Internet parental controls are only tools, they cannot replace the role of parents in mediating the use of the Internet especially by young children. By this, we mean using the Internet with the child, encouraging the child to look for safe and useful information, sharing online experiences with the child and even teaching the child the rights and wrongs of accessing pirated content.
- 3.35. Whilst the MDA has concentrated on only dictating the type of solution that IASPs must provide, the MDA has omitted mention that that online piracy in Singapore is most prevalent amongst youths and that the education and awareness programme that the MDA and government bodies should actively review would be one that educates the youth about the harm presented by online piracy, both on the user segment and on the industry. For in a recent study, illegal online piracy sites are cited as "a playground for advertisements that advocate scams, gambling and pornography."<sup>1</sup>

#### **4. CONCLUSION**

- 4.1 SingNet and SingTel Mobile submit its view and comments to the MDA for its consideration.

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<sup>1</sup>Survey shows online piracy in S'pore most prevalent among youths, 18 Mar 2014,  
<http://www.channelnewsasia.com/news/singapore/online-piracy-in/1039736.html>