



SINGTEL MOBILE SINGAPORE PTE LTD

RESPONSE TO PUBLIC CONSULTATION ON PROPOSAL TO STRENGTHEN SAFEGUARDS FOR SMS MESSAGES TO SINGAPORE USERS: IMPLEMENTATION OF ANTI-SCAM FILTER SOLUTION WITHIN MOBILE NETWORKS

1. INTRODUCTION

1.1. Singtel Mobile Singapore Pte Ltd (**Singtel Mobile**) welcomes the opportunity to respond to the public consultation on the proposal to strengthen safeguards for SMS messages to Singapore users: Implementation of anti-scam filter solution within mobile networks (**Consultation Paper**).

1.2. This submission is structured as follows:

Section 2 – Statement of Interest

Section 3 – Comments

Section 4 – Conclusion

2. STATEMENT OF INTEREST

2.1. Singtel Mobile has a comprehensive portfolio of mobile services that includes voice and data services over 3G, 4G and 5G networks. Singtel Mobile serves both corporate and consumer customers and is committed to bringing the best of global information communications to its customers in Singapore, Asia Pacific and beyond.

2.2. Singtel Mobile welcomes the opportunity to make this submission on the Consultation Paper.

3. COMMENTS

3.1. As the IMDA is aware, Singtel Mobile has been supporting various initiatives in the fight against scams and has cooperated with the IMDA to combat scam calls and SMS messages. Singtel Mobile has also undertaken its own consumer awareness



programmes to inform and educate consumers regarding the common tactics used by scammers to trick victims. Singtel Mobile regularly updates such information relating to these scams on our website¹ and social media accounts. Singtel Mobile has also produced several videos to educate consumers on how to protect themselves against scams.

- 3.2. As a general comment, Singtel Mobile supports the Info-comm Media Development Authority's (IMDA) proposal for the implementation of an anti-scam filter solution by mobile network operators (MNOs) in Singapore.
- 3.3. In this regard, Singtel Mobile notes that section 62(1)(b) of the Telecommunications Act 1999 states that "*...any officer, employee or agent of a public telecommunication licensee who, except in obedience to an order under the hand of the Minister or the direction of a court, wilfully omits to transmit or intercepts or acquaints himself or herself with or detains any message (or part of it) or deliberately causes a call or connection to be disconnected or not to be connected shall be guilty of an offense.*" In light of this provision, Singtel Mobile would request the IMDA's confirmation that the IMDA's proposed implementation of anti-scam filter solution by MNOs would not breach or violate the Telecommunications Act 1999. Singtel Mobile also requests the IMDA's confirmation that MNOs will be indemnified against any legal repercussions or liabilities arising from the unintentional blocking of legitimate SMS messages due to the implementation of the anti-scam filtering solution.
- 3.4. In relation to SMS messages flagged as potentially suspicious where further assessment is required to ascertain if these are indeed scam SMS messages, it may not be possible to undertake such assessments if the sender or recipient fields are anonymised before it is channelled to Singtel Mobile's technical personnel for a second layer of review. Singtel Mobile requests for more clarity from the IMDA on how Singtel Mobile will be able to undertake such an assessment if potentially suspicious SMS messages are anonymised.
- 3.5. In terms of implementation cost, the implementation of an anti-scam filtering solution by MNOs would incur considerable cost by the MNOs, both one-off and ongoing. Singtel Mobile requests that the IMDA considers providing funding support to the

¹ <https://www.singtel.com/personal/suport/scam-advisory>



MNOs for capital and operational costs related to the implementation of the anti-scams filtering solution which benefits all consumers.

- 3.6. With respect to the implementation timeline, the anti-scams filtering solution as specified by the IMDA in its consultation paper is highly dependent on whether such capabilities are available in Singtel Mobile's network. If such capabilities are not available, or if further modifications are required, in Singtel Mobile's network to meet IMDA's specifications for the anti-scams filtering solution, Singtel Mobile will require time to implement such anti-scams filtering solution to ensure that it does not adversely impact its ability to provide SMS service to its customers.

4. CONCLUSION

- 4.1. Singtel Mobile generally supports the IMDA's proposal for the implementation of an anti-scams filter solution by MNOs in Singapore.

- 4.2. Singtel Mobile requests that the IMDA:

- i. confirms that the implementation of anti-scams filter solution by MNOs would not breach or violate the Telecommunications Act 1999;
- ii. confirms that the MNOs will be indemnified against any legal repercussions or liabilities; and
- iii. provides clarity from the IMDA on how Singtel Mobile will be able to undertake assessment of potentially suspicious SMS messages if such SMS message are anonymised.

- 4.3. Singtel Mobile also requests the IMDA considers providing funding support to the MNOs for capital and operational costs related to the implementation of the anti-scams filtering solution which benefits all consumers.

- 4.4. Singtel Mobile will be pleased to clarify any of the views and comments made in this submission, as appropriate.