

Asia Internet Coalition (AIC) Submission on "Public Consultation on Full SSIR Regime", Singapore

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Subject: AIC Comments and Recommendations on the Public Consultation on Strengthening Safeguards for SMS Messages to Singapore Users 1) Full SMS Sender ID Regime; and 2) Implementation of Anti-Scam Filter within Mobile Networks

On behalf of the [Asia Internet Coalition](#) (AIC) and its members, I am writing to express our sincere gratitude to the IMDA and Singapore Police Force (SPF) for allowing the AIC to submit detailed comments on the **Public Consultation on Strengthening Safeguards for SMS Messages to Singapore Users 1) Full SMS Sender ID Regime; and 2) Implementation of Anti-Scam Filter within Mobile Networks**.

As an introduction, AIC is an industry association of leading Internet and technology companies in the Asia Pacific region with an objective to promote the understanding and resolution of Internet and ICT policy issues.

First and foremost, we commend the Government of Singapore's public consultation aimed to develop a multi-pronged fight against scams, with a need to build multiple layers of defence to further safeguard SMS as a communications channel. However, given the nature of the subject matter, the potentially wide variances in operational models and implementation considerations across the industry players makes the IMDA's proposed implementation timeline tight and infeasible. Given the provisions in the consultation document, many industry players have had to conduct fresh assessment exercises, to understand the latest extent of their aggregator agreements.

As responsible stakeholders in this policy formulation process, **please find appended to this letter detailed comments and recommendations which we would like to respectfully request IMDA to consider.** We sincerely hope IMDA can agree to the SMS sender ID registering entity proposal and the transition period can be extended to for another six months to June, 2023 before the commencement of the Full SSIR Regime.

Should you have any questions or need clarification on any of the recommendations, please do not hesitate to contact our Secretariat Mr. Sarthak Luthra at Secretariat@aicasia.org or at +65 8739 1490. Furthermore, we would also be happy to offer our inputs and insights on industry best practices, directly through discussions and help shape the dialogue for the advancement and strengthening safeguards for SMS messages to Singapore users.

Thank you

Sincerely,



Jeff Paine
Managing Director
Asia Internet Coalition (AIC)

Detailed Comments and Recommendations

The Asia Internet Coalition (AIC) appreciates the IMDA's efforts to curb the proliferation of SMS scams in Singapore. We would like to take this opportunity to bring to the IMDA's attention the following issues:

1. Proposal to make Sender ID registration a requirement for all Organisations that choose to use Sender IDs (i.e., the Full SSIR Regime)

While we understand and appreciate the requirement for allowing SMS from registered Sender IDs only, the requirement that all Organisations that send such SMS need to register with IMDA seems impractical.

Most Organisations send transactional SMS for login and authentication of their services, and route these SMS through carriers and SMS Aggregators, who may or may not already be listed entities under the List of Participating Aggregators under Singapore SMS Sender ID Registry (SSIR) (as per Annex A in the Consultation).

For some companies, these SMS messages are managed globally by a team based in the headquarter outside of Singapore and support various customer-related business activities which are actually offered by both their Singapore entity and foreign affiliate respectively.

As the Consultation also proposes that all SMS Aggregators are to be licensed by IMDA and participate in the SSIR, it would be most feasible to have these licensed SMS Aggregators register and bear responsibility for the various Sender IDs that they send on behalf of the Organisations they work with.

Similar arrangements have been made in numerous countries around the globe. For instance, in Indonesia, aggregators must register with the government but are not licensed. In Pakistan, aggregators need to seek a license from the regulator. In both instances (and numerous others globally), the aggregators, and not the senders, are solely responsible for the local registration.

Globally, registration of senders is nearly non-existent, particularly where the SMS are transactional (registrations, passwords) rather than when they are marketing in nature. The most common approach where such regulations exist is that third party organisations originating the SMS provide the necessary information and documentation to the SMS Aggregator or carrier, who then is responsible for ensuring the validity of the various Sender IDs. Thus to emphasise, the dominant approach is through aggregator registration and a Know Your Customer (KYC) requirement, particularly for marketing. Transactional SMS are often exempt from these requirements as they are necessary means of communications between businesses and their users.

By having the registered aggregator or carrier verify the identity of the sender, the risk of spoofing attacks is vastly reduced. Moreover, by focusing the requirements on entities sending marketing messages rather than transactional messages, the IMDA can align the requirements for the messages that create the greatest risk of spoofing, as a sender providing transactional information would be incentivized to make their identity clear. As such, instead of each Organisation registering separately with the IMDA, it would be far more efficient if they can provide all the necessary details such as managing the Sender IDs of their customers. As per Point 22 in the Consultation, the KYC procedures outlined for SMS Aggregators should suffice for the SSIR to address the issue of SMS scams and spoofed Sender IDs. Making Sender ID registration a requirement for all Organisations should not be necessary.

We strongly suggest IMDA to consider (a) allowing either foreign entity's qualified Singapore aggregator or its existing Singapore affiliate to register with the SSIR on behalf of the foreign entity; and, (b) providing sufficient time to adjust internal processes for the sending of SMS messages to Singapore mobile users, as well as the engagement of SMS aggregators / vendors in order to comply with the new requirements.

2. Implementation timeline

The timeline for implementation of this mandatory registration for all SMS Aggregators (and Organisations) is limited to a period of 3 months, from October to December 2022.

The proposed regulatory obligations will have significant implications on how companies structure their operations to send SMS messages to customers in Singapore. The current transition time frame provided in the Draft is insufficient to complete the transition. In addition, according to the Draft, foreign business entity is required to set up a local presence to obtain an UEN for sender ID registration, it will inevitably present challenges and increase unnecessary administrative and economic burden to such foreign business entity

Many Organisations have engaged SMS Aggregators in regional and global partnerships, and have contractual agreements that reflect this. Many leading regional and global SMS Aggregators are based outside of Singapore, and while they may make arrangements to register and be licensed in Singapore as per the requirements of this Consultation, there may be delays in transferring and revising existing regional and global contracts to local Singaporean registered entities. Even if this approach is feasible, it is likely to take more than the 3 months stipulated in the Consultation.

As aforementioned, most Organisations send SMS for login and authentication of their services. The IMDA's approach to block Organisations that are not ready by the proposed deadline, will affect the ability of users to secure their services.

Accordingly, we ask that the IMDA extends this deadline to ensure that the necessary arrangements can be made by both Organisations and SMS Aggregators so that they may be able to support the full SSIR model. A more reasonable timeframe, of at least 6 months or more, will be necessary to help ensure that various business functions and services that rely on SMS delivery remains intact for all users in Singapore. In addition, we request that the IMDA consider an exemption from registration of Sender IDs when the purpose of the SMS is transactional, rather than for marketing purposes.