

(a) cover page

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(b) summary of major points:

High fee structure impose on organisation is an extra cost burden on top of the current high inflation rate.

Current SSIR on voluntary basis is effective

(c) statement of interest;

We are an aggregator currently serving many organisations in the Asia Pacific region.

(d) comments;

We deal with many micro, small and medium organisation. The fee structure for of (a) one-time set up fee of \$500; and (b) \$1,000 a year for up to 10 Sender IDs is an addition expenses that will burden many micro, small and medium organisation.

There are quite a number of companies (micro, small & medium) operating in the neighbouring countries that do have clients in Singapore and they are using SMS as medium of communication to update their clients. With the implementation of full SSIR regime, on top of that additional expenses (SSIR & ACRA) incur for registration of Sender ID and other operational process (eg: ACRA registration), it will be a hindrance for them to register. As a result, customers in Singapore will be able to receive important updates / notices / reminders.

We have received feedback from some of our clients that the registration fee for Sender ID is on the high side and it is an expensive cost at their end. Thus, many decided not to register their Sender ID in order to maintain low operation cost.

(e) conclusion

In view that the current SSIR is effective, we of opinion, to continue with the current SSIR on voluntary basis.