



**M1 Limited**

14 September 2022

Ms Aileen Chia  
Director-General (Telecoms and Post)  
Deputy CE (Connectivity Development & Regulation)  
Infocomm Media Development Authority  
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By Email: [Consultation@imda.gov.sg](mailto:Consultation@imda.gov.sg)

Dear Ms Chia,

**PUBLIC CONSULTATION ON PROPOSALS TO STRENGTHEN SAFEGUARDS FOR  
SMS MESSAGES TO SINGAPORE USERS: FULL SMS SENDER ID REGIME**

1. We refer to the above public consultation paper issued by the IMDA on 15 August 2022.
2. M1 welcomes the opportunity to review and submit our comments to the consultation paper. Please refer to the enclosed document for M1's response to the consultation paper.
3. Please do not hesitate to contact us if you have any further queries.

Yours sincerely,

Mr Wee Keng Hoon  
Deputy Director  
Regulatory

Encl.

**PUBLIC CONSULTATION ISSUED BY THE INFO-COMMUNICATION  
MEDIA DEVELOPMENT AUTHORITY**

**ON**

**PROPOSALS TO STRENGTHEN SAFEGUARDS FOR SMS MESSAGES  
TO SINGAPORE USERS: FULL SMS SENDER ID REGIME**



**Consultation Submission by M1 Limited**

**14 September 2022**

This paper is prepared in response to IMDA’s public consultation document issued on 15 August 2022 and represents M1’s views on the subject matter. Unless otherwise noted, M1 makes no representation or warranty, expressed or implied, as to the accuracy of the information and data contained in this paper nor the suitability of the said information or data for any particular purpose otherwise than as stated above. M1 or any party associated with this paper or its content assumes no liability for any loss or damage resulting from the use or misuse of any information contained herein or any errors or omissions and shall not be held responsible for the validity of the information contained in any reference noted herein nor the misuse of information nor any adverse effects from use of any stated materials presented herein or the reliance thereon.



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## **Introduction**

1. M1, a subsidiary of Keppel Corporation, is Singapore's first digital network operator, providing a suite of communications services, including mobile, fixed line and fibre offerings, to over two million customers. Since the launch of commercial services in 1997, we have achieved many firsts – becoming one of the first operators to be awarded one of Singapore's two nationwide 5G standalone network license, first operator to offer nationwide 4G service, as well as ultra high-speed fixed broadband, fixed voice and other services on the Next Generation Nationwide Broadband Network (NGNBN).

2. M1 welcomes the opportunity to review and submit our comments to the IMDA's public consultation on "Proposals to Strengthen Safeguards for SMS messages to Singapore Users: Full SMS Sender ID Regime" ("Consultation"). We share the same concerns with IMDA on the scams that the public is facing, which includes our subscribers.

3. As cited in IMDA's press release issued as part of IMDA's Consultation, the telcos (including M1) have been working with the authorities to implement various measures to strengthen protection against scams. Other initiatives include working with the authorities to suspend or terminate the service lines that are used for scam purposes, and establishing outreach to our customers, such as providing scam advisories on our website and a dedicated hotline for our customers to alert M1 of a scam incident.

4. Notwithstanding the above, M1 wishes to emphasize that the efforts to combat scams must be proportionate and relevant, and not result in other unwarranted repercussions. As scams can continue to evolve with new tactics and techniques, a concerted response, including having a discerning and vigilant public, will build a more effective and sustainable protection against scams.

5. M1's views on the IMDA's Consultation are set out further below.

## **M1's views on IMDA's Consultation**

6. In its Consultation, IMDA has proposed to implement the full SSIR Regime for Singapore. This requires all organisations who use Sender IDs when they send SMS messages to Singapore mobile users to register and protect their Sender IDs. This also means that only registered Sender IDs can be used, and all non-registered Sender IDs will be blocked as a default.

### **Real possibility of genuine SMS being blocked**

7. Given that there are a very large number of organisations (both local and foreign-based businesses) that send SMS messages to Singapore mobile users for various purposes, we are concerned that many mobile users may not receive genuine SMS messages when organisations fail



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to register their Sender IDs with the SSIR. In particular, we note that IMDA proposed a transition period of only two months for all organisations to register their Sender IDs with SSIR. We are of the view the transition period would be insufficient to allow for all organisations to register their Sender IDs with the SSIR.

Potential public confusion and impact to telcos' frontline service

8. It is not clear to M1 how the authorities intend to prepare and educate the general public on the implications of implementing the full SSIR Regime, e.g., a genuine SMS message may not be received from an organisation and what should be the recourse for the affected Singapore mobile user.

9. The lack of public awareness and general understanding of the matter will create public confusion and misconception when a Singapore mobile user is unable to receive a genuine SMS message. Under such circumstances, there will be a tendency for the affected Singapore mobile users to approach a telco for resolution of the problem, which we may not be in the position to do so. If the impact to the public is severe, this will undermine our frontline operation to support our customers' service requirements.

10. Therefore, as part of the implementation of the full SSIR Regime, we believe that efforts to educate and raise general public awareness will be critical to prevent public confusion and misconception. It will also help to reinforce IMDA's efforts to encourage organisations to register their Sender IDs with the SSIR.