

Public Consultation on Full SSIR Regime

Comments by

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Dear Ms Aileen Chia,

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Summary of Major Points

While we support the full SSIR regime for all organisations in Singapore, we are of the view that the cost imposed exceeds the benefits for companies that are not significantly affected by scams. Such costs may deter these companies from using SMS in their business operation to improve productivity through digitalisation.

Hence it is proposed that the fees for these companies be lowered through a tiered fee structure with a registration fee of not more than \$50 and a subscription fee of not more than \$50/year for just 1 sender ID.

Statement of Interest

As a SMS aggregator, I am highlighting the impact of the implementation of the full SSIR regime on my customers.

Comments

Rationale for Tiered Fee Structure

a) Charging Based on Benefits from the Full SSIR

While having a mandatory sender ID regime will make the system more robust, not all companies will benefit from the implementation:

- Not all companies experience the same impact of a scam. For example, a scam involving a financial institution will have a higher impact on their finances and reputation as compared to a construction company that only provides noise alert sms. Hence the construction company may not derive as much benefit as the financial institutions from a full SSIR regime.
- Not all companies have the same attraction to scammers. A scammer will more likely target an entity that has financial reward or possibility of identity theft rather than one that has no possible financial gain with a very small user base. Paying the high annual fee would be viewed as excessive for such companies that are of very low risk of being the scammers' target.

Hence, a tiered fees structure would be more equitable so that companies that benefited more from such a regime will pay more and vice versa.

b) High Annual Fees

We are of the view that the one-time set up fee of \$500 and an annual fee of \$1000 are relatively high as compared to the following fees charged by other government agencies which a company has come to accept and benchmark against:

- A typical domain name costs less than S\$50 per year, with no setup fees.
- Registration of a company costs a one-time fee of \$300.
- A SIM card subscription only costs about \$300 / year
- A SBO Licence is a one-time cost of \$200.

For SMEs, or even larger companies, the fees to be incurred may not justify having their sender ID protected, depending on individual use cases. Imposing such a fee on companies that do not benefit substantially from the full SSIR will deter them from utilising technology like SMS solutions to digitalise their processes.

While it is difficult to quantify or measure a benefit, we can, in general, group companies based on the industry. For example:

- Government / Statutory boards
- Financial Institutions
- eCommerce Platforms
- Others

The first three groups will in general benefit more, and hence should contribute by paying a higher fee for the protection.

For the rest, rather than having a one-time setup fee of \$500 and \$1,000 per year for a block of 10 Sender IDs, a registration fee of \$50 and a subscription fee of \$50/year for just 1 sender ID will seem more affordable and reasonable.

Conclusion

As stated in the paragraphs above, making Sender ID mandatory benefits some companies more than others. If the objective is to protect the public in general, then the costs should be borne by the government. An example will be Cyber Security Agency of Singapore where services are provided without a fee.

However, if the stand is that the sender shall carry the burden of cost, the fee structure should be more equitable such that companies that benefit more should pay more.

Yours Sincerely

Tho Chin Yue / General Manager