

SENDQUICK PTE LTD
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**COMMENTS SUBMISSION ON
PROPOSALS TO STRENGTHEN
SAFEGUARDS FOR SMS MESSAGES TO
SINGAPORE USERS: FULL SMS SENDER
ID REGIME**

SUBMISSION BY

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AS A PARTICIPATING AGGREGATOR

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1. BACKGROUND

First, we would like to thank Infocomm Media Development Authority (IMDA) in your effort to combat scam and fraud that originated from the misuse of SenderID in SMS messages. This is an effort in the right direction to ensure all forms of communication channels remain trusted, useful and effective for all stakeholders in Singapore.

We are a Singapore company (founded in 2001) and has been doing mobile messaging business though predominantly SMS since then. We have seen the evolution and adoption in the industry and firmly believe in the vast potential of messaging for consumer and businesses in being an effective and efficient tool for daily transactions.

Today, we have served more than 2500 customers in Singapore and worldwide, with customers ranging from all industries including government, healthcare, education, enterprises and many others.

As a licensed operator (SBO under IMDA) and a Participating Aggregator (PA) under the Singapore Sender ID Registry (SSIR), we would like to present our comments from two perspectives:

1. As a Participating Aggregator (PA) and industry stakeholder
2. Represent views from our customers (enterprises)

These views are non-exhaustive and does not represent the industry as a whole.

We are open to further elaborate on the comments if IMDA deemed necessary.

2. COMMENTS AS PARTICIPATING AGGREGATOR

Background

We have been in discussion with MEF since August 2020 and subsequent development and implementation of MEF in Singapore and then, SSIR. As a Participating Aggregator (PA), we are supportive of IMDA actions to implement SSIR to strengthen the use of SMS for genuine applications and to reduce (if not eliminate) the exploitation of SMS weaknesses by unauthorised parties for their commercial gain.

Comments on Compulsory Implementation of SenderID

- i. We are **supportive in moving towards compulsory registration for all SenderIDs** in Singapore. Singapore is not the first country as there are many examples in Southeast Asia that had implemented similar approaches like The Philippines, Indonesia and Vietnam, which are known to have strict registration regime.
- ii. Given Application-to-Peer (A2P) SMS volume may still be in hundreds of millions messages a month in Singapore, there are many companies who are using SenderID today. These can be in thousands and these can be large companies (like Banks) or small companies, like single retail shop and enrichment centre. Given the current precedent of SSIR implementation which is inefficient, difficult to monitor and laborious, **we recommend that IMDA to implement an automated process for all companies (in Singapore) to register easily and efficiently via a portal.** This is in anticipation of thousands of applications when the rule is implemented.
- iii. The current approach of whitelist and blacklist is inefficient and demand too many hours/mandays (for IMDA, PA and companies) to implement and monitor. A more efficient method is required. Moving ahead with compulsory registration, **we are recommending to have only whitelist and any deviations from whitelist will be blocked/rejected.** Some formatting for whitelist to be fixed, eg 11 characters, all large caps and small caps, no space, no special characters. This is easier as all companies knows what they want, and do not require to guess what they do not want.
- iv. The fee levied for SSIR is excessive. While the fee may seem 'small' compared to MEF approach, it is important to note that MEF fee was not reasonable. As the compulsory registration impact both big and small companies, we are recommending that there is no registration nor annual fee to be levied. Do note that currently all fees go to SGNIC and not to PA. PA (all 40 of us) have been doing all the investment and implementation work and have not demanded to be remunerated. We believe this is an investment for the better of Singapore consumers. Hence, we hope SGNIC (a company fully owned by IMDA), will be gracious to **waive all fees for companies large and small to allow them to register.** Naturally, IMDA can implement some controls like free registration up to 10 SenderIDs (in the whitelist, no more blacklist) to avoid abuse. As a precedent, countries like Philippines and Indonesia does not levy any fee. Countries like Vietnam levy a \$50 one time fee. In comparison, IMDA fee of \$500 and \$1000 is seen as non-supportive of the industry.
- v. **Implement an API based system where all PA can query to receive updates for registered SenderIDs.** This portal system, owned by SGNIC is to be open (at no charge) to all PA and we will query to receive the newly updated whitelist SenderID and this can be automatically populated to all PA in a short time. Such synchronisation can be done once or twice a day. If SGNIC face any difficulties, we can assist in building the system and to be implemented by SGNIC.

- vi. How does SGNIC determine the registrable of a SenderID name? Generic terms like Alert, Notification and tradenames need to be protected and issued to the rightful owner. **SSIR needs to establish a process and criteria for approval of SenderID names for the companies.** There are situations where the same name can be applied by different PA as companies work with multiple PA for their projects (eg, SIA may have different agency or vendor to help them to send SMS).

3. COMMENTS ON BEHALF OF REGISTERING COMPANIES

Background

TalariaX and SendQuick has been offering SMS services for many years. We have hundreds of customers from all sectors and sizes. These are from various industries and they are using SMS for various applications.

Comments on Compulsory Implementation for Companies using SenderID

- i. Since the implementation of SSIR, we have many commercial companies asking us on the procedure and process for implementation. In short, the **interest is high and companies will be supportive** towards the compulsory implementation.
- ii. First concern is public education. The process, procedure and steps towards registration and implementation was not clear. It is understandable due to the initial urgency caused by the OCBC scam incident. Now with more planning and an expected high volume of applications, a better process and well executed plan is required. PA can play a role in providing information and education but IMDA/SGNIC needs to provide a clear direction and instructions. **PA and IMDA should collaborate to provide a unified message on the process and procedure for SenderID Registration.**
- iii. The fee levied in current SSIR implementation is too high. We have customers who use SenderID and only spend about \$500 per year on SMS services. Registering at \$1000 per annum for SSIR is not viable for such businesses. **The service should be inclusive regardless of business sizes.** The approach should be that all companies should be protected, regardless of size and background. As such, **we recommend that all fees are waived for SenderID registration for SSIR.**
- iv. A well communicated activation duration and service delivery is required. **Companies need to know how they can check for SenderID availability, protection, approval guidelines and how long before it is activated. Recourse process need to be established.** In short, a thorough customer experience journey needs to be designed and communicated to the companies. This process needs to be supported by the PA as partner in this implementation.
- v. There are foreign companies that do not have many Singapore users who needs to send OTP and other messages but they are not registered as a business entity in Singapore. This is true for companies that offer SAAS and cloud services who usually send an OTP for verification and password recovery. **There needs to be a process and ability for such companies to register SenderID without the need for ACRA UEN, using a company authorised letter for PA to register on their behalf.** Such practise is already implemented for Vietnam, Indonesia and The Philippines.