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TO: IMDA,
SGNIC

Whispir Pte Ltd.
1 Raffles Quay,
#27-12, Singapore,
048583

Subject: “[For Licensee's Attention] IMDA Consultation on Proposed Full SMS Sender ID Regime”

To Whom It May Concern:

Dear Sir/Ms,

We are responding to the notification that was sent by IMDA on the 15th of August 2022 titled: “[For Licensee's Attention] IMDA Consultation on Proposed Full SMS Sender ID Regime”.

We like to share our humble inputs and propose practical recommendations that will help create transparency, promote ease of use and ensure uniformity surrounding Sender ID registration and regulation within the Singapore A2P SMS market via SMS Sender ID Registry (“SSIR”). We heavily rely on our experience dealing with messaging regulations, mobile network operators, other aggregator partners, connection infrastructure and processes within various other markets (countries) internationally, who already have comparative measures in place, with some of these measures against malicious actors and practices within the A2P Messaging Market have already successfully been rolled out.

It is our concern that some of the proposed measures by IMDA, have not considered certain market factors and thus will have the following implications:

- 1.1) The charging of fees for mandatory Sender ID registration will affect many legitimate large, medium and small companies already using SMS as part of their business models.
- 1.2) Companies with intense procurement processes will find it problematic to onboard SGNIC as a supplier. SGNIC will need to comply with their supplier onboarding requirements. Have SGNIC considered this externality to enforce this and does SGNIC have the capacity to respond to such a procurement process considering the small dollar (\$) amount involved?
- 1.3) Over regulation, additional (unforeseen) costs being incurred as well as the complexity surrounding the management and registration of Sender IDs will directly affect (dilute) SMS as a core communication channel of business for many companies. This will drive companies to explore and move to ALTERNATIVE communication channels (i.e. diversified channels through a multitude of Mobile Applications) which in turn will result in and add to a larger complexity of regulation that would be needed across a multitude of channels.

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- 1.4) The proposal assumes that ALL the customers would have an ACRA to be able to register their Sender IDs using their UEN. Many international companies (Brands) sending valid SMS, (i.e. Airlines, Logistics Firms, Non-Profit-, and Government Bodies outside Singapore), will find it problematic to register their Sender IDs to terminate SMS only because they don't hold a local Singapore entity. This in turn will result in international companies ceasing to use SMS to support their business activities in Singapore.
- 1.5) Regulation surrounding Sender ID (whitelisting) registration should NOT result in a complete "Barrier of Entry" for *existing* as well as *new* businesses who want to use A2P SMS as part of their business model to communicate with their customers.

Our **recommendations** are as follows, even though in some instances this might need some additional context where these suggestions might be unclear or technical of nature:

- 2.1) All businesses should have the ability to send messages (A2P SMS) within Singapore, given they are either able to provide their official business registration in Singapore (UEN and ACRA) OR they are able to provide to provide their official business registration documents within the country of their where their Head Quarters is situated.
- 2.1) The responsibility of blocking unauthorized Sender IDs should ultimately also lie with each of the Singapore Mobile Network Operator, especially since the Mobile Network Operators is the "*last line of defence*" as well as the primary and final channel over which Messages (SMS) are being delivered from to each Mobile Handset Numbers (MSISDNs) which they own and service.
- 2.2) All Participating Aggregators in Singapore to also implement blocking of Sender IDs which contains irregular characters i.e. Special-, Chinese-, Numeric Characters-, Multiple Spaces ect. As already defined by "The Registry" (SGNIC).
- 2.3) Both Mobile Network Operators and Participating Aggregators should ONLY allow A2P Messages (SMS), using **registered** (Whitelisted) Alpha Numeric & Short-code and approved Long Numbers as Sender IDs. Every Message (SMS) being sent over an unregistered Sender ID (AlphaNumeric & Shorcodes or Long Numbers) should not be able to pass over the network connections of participating aggregators – given their available filtering and blocking methodologies.

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Filtering and blocking methodologies can further be simplified as follows:

3.1) To NOT allow any **Special Characters** (! @ # \$ % ^ & * () / \ ? > < . , ; : " [] { } | \) *within* AND *as part of* ANY and ALL Sender IDs;

3.2) To NOT allow any **Numerical Characters** (1, 2, 3, 4, 5, 6, 7, 8, 9, 0) *within* AND *as part of* ANY and ALL Sender IDs;

3.3) To NOT allow **Spaces** (of any amount) *before* AND *after* ANY and ALL Sender IDs;

3.4) 3.3) To NOT allow more than one (>1) **Spaces** (of any amount) *in between* ANY and ALL Sender IDs;

3.4) Whitelisted Sender IDs should strictly, ONLY be provisioned on each approved Participating Aggregator's platform's dedicated "Accounts (Connections)", to and from each other (including the Mobile Network Operators), over which ONLY the (Whitelisted) registered Sender IDs can be delivered successfully to mobile handsets.

3.5) Alternative connections can be used to deliver traffic from all other businesses and Sender IDs who is not part of "The Registry", but these connections SHOULD implement rules 3.1, 3.2 and 3.3 as part of their active blocking activity (firewall) AND DON'T allow the Sending of ANY Sender ID on BOTH the Whitelist as well as the Blacklists.

3.6) Sender IDs are limited to 11 characters ONLY (this should be standard as per protocols used to deliver SMS's to the MNO's).

**These recommendations (in 3) were already made in previous correspondence to the IMDA.*

4) Companies should be able to register (whitelist) their Alpha Numeric Sender IDs at zero cost and with as much ease as possible, in order to ensure business continuity and minimal disruption in the use of SMS as part of current business models, processes and operational activities of companies.

4.1) As part of **registration** (whitelisting) of Sender IDs at zero cost, companies would need to provide the following **customer information**:

a) *Registered Name of the Company within Singapore OR Registered Name of the Company in the country of their Head Quarters;*

b) *Country of Company's Office/HeadQuarters as per (a);*

c) *Registered Business Address of Company's Office/HeadQuarters as per (a);*

d) *ACRA (UEN) OR Business Registration Number (Certificate) of Company as per (a);*

e) *Companies Website Address (URL - Weblink);*

f) *Message Type Company intends to send i.e. Promotional, Notification, OTP;*

g) *List of the Sender IDs Company wants to Whitelist;*

h) *Name+Surname & Contact Details of main contact responsible for managing and approving the use of Sender ID(s).*

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It is crucial to note that a single company (entity) might own MULTIPLE brands and thus would require the registration (whitelisting) of multiple unique Sender IDs for each of their brands (business units) in order to clearly differentiate between the different services and products that they might deliver and/or offer in the market.

Please also refer to our feedback on real world examples where Sender ID registration has been rolled out and are currently in place:

Countries like Thailand, Saudi Arabia, Pakistan and the UAE are some examples where the mentioned customer information fields (a - h) are required in a combination with one another (not all), in order for business globally to have their Sender IDs registered (whitelisted) that will ensure the successful delivery of the A2P SMS that forms part of their business operations and setup. Indonesia, Philippines, China as well as other Middle Eastern and African countries have basic Sender ID registration processes in place to manage the Sender IDs that is allowed, to ensure successful delivery of SMS's to the Mobile Handset Numbers on their respective networks. The easiness of Sender ID registration in these countries where the processes can be seen as settled (not matured) can still be viewed as being complex and time consuming in nature. This is mainly due to complexities brought about flawed Sender ID registration processes and different requirements being enforced between Mobile Network Operators within each of the respective countries.

It is key to note that many of these countries still sit with bad actors finding ways to successfully send SMS to unsuspecting mobile handset users through their spam/phishing activities, despite the best efforts of Sender ID Registration requirements and filtering systems that is in place.

5.) A sufficient time period should be set out for ALL businesses to have their Sender IDs registered (whitelisted) with the regulator in order to allow for the entire market (all industries) to adjust to the proposed (new) regulations within the Singapore A2P SMS market that is not already in place. This would also allow the regulators as well as all stakeholders to help identify any snags that might arise in the process, which in turn might require additional tweaks and adjustments to be done in order to ensure that a smooth and easy to use process is in place across the market for all legitimate businesses, stakeholders, participating aggregators as well as the Mobile Network Operators.

Lastly, it is important that Sender ID Registration is uniform to- and applied similarly across all the Singapore Mobile Network Operators to ensure continuity and accuracy on how Sender IDs are being managed and accounted for by "The Registry".

I did try to cover most of the important items, but in the same breath might have missed other key points, which hopefully will be picked up by other Participating Aggregators and Mobile Network Operators, especially where it is of significant importance AND can have an influence to help improve the proposed regulation for all key parties and stakeholders involved.

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Thank you for your attention and time to assess the inputs and recommendations we've provided here and please feel free to let us know should you require any further clarity or elaboration here.

Yours Sincerely;

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