



WOODGROVE DENTAL SURGERY

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Aileen Chia (Ms)

Director-General (Telecoms & Post)
Deputy Chief Executive (Connectivity Development & Regulation)
Infocomm Media Development Authority
10 Pasir Panjang Road
#03-01 Mapletree Business City
Singapore 117438

Dear Ms Aileen Chia,

Public Consultation on Full SSIR Regime

Scams are an increasing menace in Singapore, with the latest mid-year crime statistic released recently by the Singapore Police Force showing that scams comprised more than half of the total number of reported crimes in Singapore for the first half of 2022. I am therefore encouraged to see that IMDA is taking proactive action against phishing scams by securing SMS Sender IDs to prevent spoofing. I agree with the policy that SMS Sender IDs should be protected and that a full SSIR regime will prevent Sender ID spoofing and thereby increase trust in SMS as a communication channel.

Despite the rise of alternative messaging platforms in the past decade such as WhatsApp and Telegram, SMS remains an important communication channel for organisations to connect with their end users. At our dental clinic, we primarily rely on SMS to remind our patients of their upcoming appointments. We also use SMS to remind patients when they are due for their bi-annual dental check-up. Our SMS messages include our Sender ID to ensure that our patients can easily identify our messages. We currently send no more than 10,000 SMS messages annually and spend less than \$500 a year on this.

My primary concern with the present proposal is the cost for small businesses like ours to continue using Sender IDs. The proposed one-time set up fee of \$500 and an annual fee of \$1,000 would mean that we will have to incur a cost of more than three times of our current annual expenditure on SMS messages for the first year. It will be untenable for us to continue using Sender IDs and we will have to drop the usage of Sender IDs. This will adversely affect the trust that patients have in our SMS messages as they will appear to be from a random overseas number.

I note that SGNIC also runs the registry for the .SG Country Code Top Level Domain. Similarly, a UEN is required to verify a commercial entity in order to register a .com.sg domain name. We pay roughly \$70 annually for our domain name which is significantly more palatable compared to the SSIR fees. I hope that IMDA can be forthcoming on how the SSIR fees were derived and why they are considerably higher than the domain registration fees.

Contrary to the point made in paragraph 17, the proposed fees are not accessible to all types of businesses. Such hefty fees would drive small businesses like ours away from using Sender IDs. Without Sender IDs, trust in our SMS messages will be negatively affected. I hope that IMDA can look into increasing the accessibility of SSIR for small businesses so that trust in SMS communication channels can be improved for the public at large.

Yours sincerely,

Dr Ryan Khaw
BDS (Otago)
Clinical Manager
Woodgrove Dental Surgery Pte Ltd