

Dear Sir,

I am writing in response to the public consultation on Full SSIR Regime.

I am in support of making this requirement mandatory. However, SMS is no longer the only way organization sends 2FA code or communicate with their clients based in Singapore. Increasingly, organization are also using Whatsapp, WeChat, Telegram to name a few.

Apart from having a central registry for SMS, IMDA could also make it an official requirement for organization to publish all their SMS Sender ID and also publish their other communication channel sender ID and establish a single communication channel for end individual to separately contact the organization for verification. And that this information must also be included in all their communication.

In many spoof cases, the victims are given a very short or unachievable deadline to meet or be subjected to a no-recourse penalty. By creating an artificial time pressure, victims are often led to act.

IMDA should also work with CASE and other agencies to set up a basic industry protocol. For example, having a dispute channel relating to payment or penalty fee such that there is sufficient time e.g. 7 working days for disputes to be resolved. And educate both the industry and the public on such protocol.

This will greatly reduce the chance of spoofing attack gaining a psychology foothold to push individuals to act with less due diligence.

Regards

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