Case Reference	R/E/I/063
Title	SingTel Mobile's Failure to Comply with Section 2.5 of the Premium Rate Services Code ("PRS Code")
Case Opened	14 March 2008
Case Closed	8 April 2008
Complainant	IDA-initiated enforcement proceedings
Respondent	Singapore Telecom Mobile Pte Ltd ("SingTel Mobile")
Case Summary	SingTel Mobile maintains the IDEAS web portal where a number of premium rate services are offered to its customers. On the IDEAS portal, customers need only complete a one-time registration, after which a password would be sent to the customer's mobile phone. The customer may then proceed to enter the password on the IDEAS portal and log in to request for any premium rate services available on the portal without any further authentication from their mobile phones.

SingTel Mobile had not ensured that the process for the subscription of premium rate services over the Internet required customers to send an SMS to SingTel Mobile containing the a specified subscription keyword, before SingTel Mobile began providing each of its premium rate service to customers. This is in breach of Section 2.5 of the PRS Code. |
| IDA's Determination | Section 2.5 of the PRS Code requires that a premium rate service provider who enables its premium rate service to be purchased or subscribed for via the Internet to be delivered to mobile phones must:

(a) designate a specific purchase keyword command for that service;
(b) send the specific keyword command to every person who seeks to purchase or subscribe for the service via Internet registration; and
(c) ensure that it receives an SMS message containing that purchase keyword command from the same mobile phone number that was provided or used in the Internet registration before delivering the service to that mobile phone.

IDA had introduced the PRS Code on 17 October 2007 and the PRS Code came into effect on 16 December 2007. SingTel Mobile had earlier approached IDA for an extension of time in order to comply fully with the PRS |

Code, including Section 2.5 and IDA had then granted SingTel Mobile an extension to 14 March 2008.

On 4 February 2008, SingTel Mobile provided its solution for compliance with Section 2.5. However, IDA rejected SingTel Mobile's proposal on 10 March 2008 as the proposed solution did not meet the requirements under the PRS Code.

Consequently, SingTel Mobile informed IDA on 19 March 2008 that they were not able to implement changes to their systems in order to comply with Section 2.5 by the end of the extension period granted by IDA.

In allowing customers to subscribe to its services via its IDEAS portal, without requiring customers to send an SMS message containing a designated keyword to SingTel Mobile, beyond the extension period granted by IDA, SingTel Mobile has breached Section 2.5.1 (c) of the PRS Code.

IDA had repeatedly informed SingTel Mobile of its obligations to comply with the PRS Code in IDA's correspondences with SingTel Mobile on the matter. Therefore, IDA found that a sufficient amount of time had been granted to SingTel Mobile to comply with the PRS Code since it was introduced on 17 October 2007, after consultations which had commenced as early as May 2007.

Nevertheless, IDA found that SingTel Mobile had taken the initiative to inform IDA of their inability to comply with Section 2.5. This is also the first time SingTel Mobile had committed a breach of the PRS Code and no complaints were received by IDA in relation to this breach.

Further, SingTel Mobile had also committed towards implementing a set of modifications to the purchase/subscription of its premium rate services which complies with Section 2.5 of the PRS Code.

Based on the above, IDA concluded that SingTel Mobile had breached Section 2.5 of the PRS Code and SingTel Mobile was issued a warning.