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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

Re: Alibaba Cloud (Singapore) Private Limited's Feedback Statement on the *Proposals to Strengthen Safeguards for SMS Messages to Singapore Users: Full SMS Sender ID Regime*

Contact details:
Alibaba Cloud (Singapore) Private Limited
Alibaba Cloud legal counsel
productlegal.cloud@list.alibaba-inc.com
51 Bras Basah Road #04-08 Lazada One, Singapore 189554

1. **Summary of major points**

See point 3 below.

2. **Statement of interest**

Alibaba Cloud (Singapore) Private Limited ("Alibaba Cloud") offers SMS aggregator services in Singapore and has been registered with IMDA/SGNIC in respect of the existing SMS SenderID regime. In general, Alibaba Cloud agrees the Full SMS Sender ID Regime.

3. **Comments**

  i.   Re para.11, "To be clear, the registration requirement applies to any alphanumeric Sender ID chosen by Organisations to appear as headers in their SMS. it will not apply to mobile phone users (including Organizations) sending SMS using mobile numbers registered with their telecommunication service providers"

        Alibaba Cloud comments: We interpret IMDA's position on the above to mean that A2P messages may be sent bearing a mobile phone number as the SenderID without being subject to the registration requirement. Please could IMDA confirm our understanding and also clarify its position in the following cases where the SenderID is a mobile phone number:

        A. must this number be allocated to the party on whose behalf the SMS is sent? For example, X sends a message to its customer C through an SMS aggregator P. Must the number appearing in the message be a number of a mobile phone line held by X, or may P use its own phone number upon X's consent?

        B. Can the number used be a random number e.g +65 988888888 or must it be a legitimate mobile number issued by a Singapore telco?

        C. In cases where the message originates from outside Singapore, can an overseas E.164 number/mobile number be used as the SenderID e.g +44 23234343434

        D. can a numeric short code such as 193232 be used as the SenderID?

  ii.   Re para.22, "The regulatory requirements will include, amongst others, verifying that the Organisations, the Aggregator is sending SMS with Sender ID to Singapore mobile users on behalf of, are bona fide. Aggregators will need to collect and verify the UEN of these Organisations as part of their Know Your Customer ("KYC") process, and ensure that the proper client onboarding process takes place."

        Alibaba Cloud comments: Verifying UEN is burdensome for us, which may involve many of our employees who will have to manually trace the UEN on the UEN website. Specifically, we will input the company name, check if the UEN number self-declared by such customer is consistent with the UEN as appearing on UEN website. Please let us know if there is any easier way to do so and if IMDA can provide an API to the UEN website, so that we may call the API to check it automatically and no manual employee checks would be involved.