



Our ref: 20220914/05/5B/STM/SSIR

14 September 2022

Director-General (Telecoms & Post)
Deputy Chief Executive (Connectivity Development & Regulation)
Infocomm Media Development Authority
Attention: Ong Tong San

Dear Mr Ong

**PUBLIC CONSULTATION ON PROPOSALS TO STRENGTHEN SAFEGUARDS
FOR SMS MESSAGES TO SINGAPORE USERS: FULL SMS SENDER ID REGIME**

1. Singtel Mobile Singapore Pte Ltd (**Singtel Mobile**) refers to the public consultation issued on 15 August 2022 by the Infocomm Media Development Authority (**IMDA**) on Proposals to Strengthen Safeguards for SMS Messages to Singapore Users: Full SMS Sender ID Regime (**Consultation Paper**).
2. Singtel Mobile provides its views and comments in the enclosed Annex 1.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Sean Slattery".

f Sean Slattery
Vice President
Regulatory and Interconnect
For and on behalf of Singtel Mobile Singapore Pte Ltd

SINGTEL MOBILE SINGAPORE PTE LTD

**RESPONSE TO PUBLIC CONSULTATION ON PROPOSAL TO STRENGTHEN
SAFEGUARDS FOR SMS MESSAGES TO SINGAPORE USERS: FULL SMS
SENDER ID REGIME****1. INTRODUCTION**

1.1 Singtel Mobile Singapore Pte Ltd (**Singtel Mobile**) welcomes the opportunity to respond to the public consultation on the proposal to strengthen safeguards for SMS messages to Singapore users: Implementation of full SMS Sender ID Regime (**Consultation Paper**).

1.2 This submission is structured as follows:

Section 2 – Summary of Major Points

Section 3 – Statement of Interest

Section 4 – Specific Comments

Section 5 – Conclusion

2. SUMMARY OF MAJOR POINTS

2.1 Singtel Mobile generally supports the IMDA's proposal to further secure the SMS channel by requiring all Organisations that use Sender IDs when they send SMS to Singapore mobile users to register and protect their Sender IDs (**Full SSIR Regime**). We note that the registration process will be robust to ensure that only verified bona fide Organisations are allowed to register with the SSIR and send SMS with the Protected Sender IDs. We further note that the registration requirement will only apply to alphanumeric Sender ID chosen by Organisations to appear as headers in their SMS and will not apply to mobile users.

2.2 As the Full SSIR Regime will govern all SMS sent to Singapore mobile users, Singtel Mobile submits that the IMDA should account for different situations under which SMS are sent to Singapore mobile users and refine the Full SSIR Regime to ensure that operational efficiency and regulatory obligations are balanced.

2.3 Singtel Mobile further submits that IMDA should also provide further clarity on the scope of the Full SSIR Regime, specifically, on the type of alphanumeric Sender IDs that are governed under the Full SSIR Regime.

3. STATEMENT OF INTEREST

3.1 Singtel Mobile has a comprehensive portfolio of mobile services that includes voice and data services over 3G, 4G and 5G networks. Singtel Mobile services both corporate and residential customers and is committed to bringing the best of global information communications to its customers in Asia Pacific and beyond.

3.2 Singtel Mobile welcomes the opportunity to make this submission on the Consultation Paper.

3.3 Singtel Mobile would be pleased to clarify any of the views and comments made in this submission, as appropriate.

4. SPECIFIC COMMENTS

4.1 Singtel Mobile requests clarity on the types of SMS traffic and scenarios that will be covered under the Full SSIR Regime. Specifically, please clarify if the following SMS traffic are covered:

- a. A mobile operator's (MNOs) own SMS to mobile users (e.g. service messages, inter-operator SMS);
- b. A2P traffic originating from overseas;
- c. P2P traffic originating from overseas; and
- d. Premium rate services SMS with prefix 1460 that are sent to the MNOs own mobile users only (e.g. 1460CNA_SG and 1460ReutSN).

4.2 Further, Singtel Mobile submits that the Full SSIR Regime should not cover shortcodes. We note that under the current Sender ID registry, shortcodes are included in some instances. However, this poses significant challenges in relation to the requirement under the Full SSIR Regime where only registered Sender IDs can be used and all non-registered Sender IDs will be blocked by default.

- 4.3 We would highlight that shortcodes are not necessarily common across all MNOs, i.e. the same shortcode can be used for different purposes on each network, and the same shortcodes could be used by different Organisations depending on the MNO that assigned the shortcode. This makes it operationally difficult for Organisations to uniquely register shortcodes as their Sender IDs, and for aggregators and MNOs to block all non-registered shortcodes.
- 4.4 In relation to the requirement to block all non-registered Sender IDs by default, this would result in scenarios where genuine services relying on SMS will no longer work if the Organisation (local or foreign) does not register their Sender IDs. This would potentially lead to disruption of legitimate services such as multi-factor authentication/verification for internet services and transaction notifications from overseas merchants and banks. In this regard, we request that the IMDA clarify its position on these scenarios and the actions that the IMDA will take to minimise such a situation from occurring, as well as the actions the IMDA will take to address the public's concerns when such a situation occurs.
- 4.5 In addition, as the Full SSIR Regime will govern all SMS sent to Singapore mobile users, Singtel Mobile recommends that the IMDA, as the industry regulator, take the lead in educating consumers in Singapore about the Full SSIR Regime and in handling public complaints and addressing consumers' concerns on issues such as why they may not receive their SMS and why services using SMS no longer work in some instances as described in paragraph 4.4 above.
- 4.6 Singtel Mobile would also like to highlight its concerns regarding the IMDA's approach to implementing scam protection measures for SMS service. The IMDA's approach thus far has been to issue directions reactively and in a piecemeal fashion to MNOs to deal with evolving scams. Such an approach does not take into consideration the entire ecosystem of SMS services, e.g. MNOs, mobile virtual network operators (MVNOs), major handset suppliers and equipment vendors and therefore fails to address the issue holistically.
- 4.7 As a result of the IMDA's approach to date, MNOs have had to divert their attention and resources from other operational issues to review, provide feedback and implement these piecemeal measures, affecting MNOs day -to-day operations. Further, such measures are not always feasible nor practical to implement with regards to MNOs systems and processes.



4.8 Singtel Mobile would therefore request clarity from the IMDA on the envisioned end-state of the overall scam protection measures in order to assist MNOs to better plan their resources to deal with the increasing resource requirement arising from these measures.

5. CONCLUSION

5.1 Singtel Mobile generally supports the IMDA's proposal to further secure the SMS channel by requiring all Organisations that use Sender IDs when they send SMS to Singapore mobile users to register and protect their Sender IDs.

5.2 Singtel Mobile looks forward to receiving the IMDA's response to our requests for clarity and our recommendations. We would be pleased to clarify any of the views and comments made in this submission, as appropriate.