

Written Representation 126

Name: Starhub Ltd

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**INVITATION FOR WRITTEN
REPRESENTATIONS**

**DELIBERATE ONLINE FALSEHOODS –
CAUSES, CONSEQUENCES AND
COUNTERMEASURES**

Submission by StarHub Ltd

7 March 2018

1. DESCRIPTION OF ORGANISATION AND STATEMENT OF INTEREST:

- 1.1 StarHub Ltd (“**StarHub**”) is a fully-integrated info-communications company offering a full range of information, communications and entertainment services for both consumer and corporate markets. StarHub is a Pay-TV operator (with over 450,000 households), a mobile operator (with 2.3 million customers), and a broadband internet service provider (with over 460,000 customers).
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2. STARHUB’S COMMENTS:

- 2.1 StarHub thanks the Select Committee for providing the opportunity to comment on the issue of “deliberate online falsehoods”.

- 2.2 The Government’s Green Paper on “*Deliberate Online Falsehoods: Challenges and Implications*”¹ has set out in considerable detail: (a) the phenomenon of deliberate online falsehoods; (b) the motivations and reasons for the spreading of such falsehoods; and (c) the consequences of the spread of such falsehoods.

- 2.3 As such, StarHub’s comments are focused on some of the technical and operational issues involved in preventing and combating deliberate online falsehoods.

2.4 Current Regulations:

- 2.4.1 The Government’s Green Paper has queried whether “*any specific measures, including legislation ... should be taken*”. As a Pay-TV operator, StarHub is very aware of the strong measures the Government has already taken to ensure that broadcast content in Singapore is accurate, reliable, and free from foreign influence. These measures include:

- The Broadcasting Act (Cap. 28), which has strict rules against foreign interference in broadcasting services. The Act includes specific measures against:
 - Foreign broadcasting services that prejudice the public interest / order / national harmony (Part VIII);
 - Foreign broadcasting services engaging in Singapore’s domestic politics (Part IX); and
 - Foreign ownership and control in broadcasting companies (Part X).
- Obligations on broadcasting companies to comply with content codes set by the Info-communications Media Development Authority (“**IMDA**”). These codes ensure that the content delivered by broadcasting companies complies with the Government’s requirements on racial and religious harmony, public order and Singapore’s community standards of good taste and decency.

¹ As presented to Parliament on 5-January 2018.

- Obligations on broadcasting companies to obtain regulatory approval for the launch of any new linear channels. Such approvals can be withdrawn (with a corresponding obligation on broadcasting companies to withdraw the channel), should the channel be found in breach of Singapore's content codes.

2.4.2 Given the measures that are in place, we respectfully submit that additional regulatory obligations on licensed broadcasters are unnecessary.

2.4.3 There are also regulatory obligations on internet service providers, in regard to the content that customers can access. These measures include:

- The Broadcasting (Class Licence) Notification, which automatically licenses Internet Content Providers, requiring them to comply with the Class Licence Conditions and the Internet Code of Practice.
- Obligations on particular groups of Class Licensees to register with IMDA, i.e.:
 - Political parties registered in Singapore providing any content on the World Wide Web through the Internet;
 - Groups, organisations and corporations engaged in providing any programme for the propagation, promotion or discussion of political or religious issues relating to Singapore on the World Wide Web through the Internet;
 - Individuals determined by IMDA to be engaging in providing any programme for the propagation, promotion or discussion of political or religious issues relating to Singapore on the World Wide Web through the Internet; and
 - Internet Content Providers who are in the business of providing an online newspaper through the Internet, for a subscription fee, or other consideration.
- The obligations on Individual News Broadcasting Licensees, who provide online news websites that meet two criteria (i.e. they report an average of at least one article per week on Singapore news / current affairs over a period of two months, and are visited by at least 50,000 unique IP addresses from Singapore each month over the same two-month period).

2.4.4 It has been suggested that one "solution" to the issue of deliberate online falsehoods is to "*give the authorities more teeth in directing telecommunication firms ... to thwart the deliberate spread of misinformation online*".² However, we would highlight that IMDA already has very wide powers (under the Class Licence Conditions) to require internet service providers to block identified sites. Blocking is used today against a range of

² Please see: "*Multi-prong approach needed to combat misinformation, say experts and MPs*" ("Today", 5-January 2018).

sites, primarily those that host pornographic, scam / cheating, or gambling content.

2.4.5 Nevertheless, it is critically important to understand the limitations on site-blocking as a “solution” to the problem of deliberate online falsehoods. In particular:

- Site-blocking, by its nature, is a “blunt instrument”. For example, StarHub could block standard access by its customers to (say) Twitter or Facebook. However, StarHub is not able to block customers’ access to individual tweets or posts. Similarly, site blocking of sub-domain levels is technically and operationally very challenging.
- It would be impractical to use site-blocking as a tool to contain the spread of deliberate online falsehoods, if users can simply disseminate those falsehoods across any number of websites and platforms.
- It is possible for customers to circumvent site-blocking. The methods for circumvention include the use of VPNs (or “Virtual Private Networks”) and user-established Domain Name Servers.³
- Internet search engines will frequently provide customers with lists of alternative and mirror sites to a blocked site (thereby allowing customers to bypass the blocking).
- There is a cost to internet service providers in implementing site blocking (in terms of setting-up and maintaining that block), and there are system limits on the number of sites that can be blocked.

2.4.6 The Government already has in place a range of tools that can be used to regulate Pay-TV operators and internet service providers in Singapore. We respectfully submit that additional regulatory measures are not needed in this area. If the Government believes that additional steps are needed, in regard to deliberate online falsehoods, StarHub’s suggestions are set out below.

2.5 Additional Measures:

2.5.1 StarHub would submit that the most effective counter to deliberate online falsehoods is a discerning and “savvy” population equipped with critical reasoning skills. Educated media consumers are likely to be far more effective in assessing the credibility of a news source than any automated filtering system.

2.5.2 StarHub participates in the Media Literacy Council (“**MLC**”), established in August 2012, with a vision of creating: *“discerning Singaporeans who are able to evaluate media content effectively, and to use, create and share content*

³ StarHub has highlighted to Government some of the risks involved in the unregulated sale of VPN services by third-parties in Singapore.

safely and responsibly". The MLC has already put in place various initiatives for the young and youths (ranging from primary school to tertiary levels) to build up their awareness of digital media literacy issues. In particular, the MLC provides guidance on how to assess the validity of online content.⁴

2.5.3 StarHub is of the view that continuous public education efforts are needed to build a "media literate" populace. Therefore, the Government may wish to review: (a) the resources it makes available to the MLC for public education; and (b) whether the MLC needs to make education in regard to deliberate online falsehoods a greater priority.

2.5.4 In addition, the Green Paper has rightly noted that: "*Efforts by technology companies are also important in addressing the challenges*" of deliberate online falsehoods. If the Government has concerns over the dissemination of deliberate online falsehoods via social media, the Government may wish to work with the technology companies to address how content posted on their platforms can be taken down, blocked, or flagged as potentially unreliable. We respectfully submit that the technology companies are likely to be best-placed to manage the content on their platforms.

3. CONCLUSION:

3.1 StarHub appreciates the opportunity to comment on this issue of deliberate online falsehoods. We welcome the opportunity to clarify the regulatory obligations that are already in place on Pay-TV operators and internet service providers.

3.2 If the Government is concerned about the proliferation of deliberate online falsehoods, we submit that the most effective solution would be found in increased promotion of media literacy. This solution is likely to be more effective in the longer-term than any technical or regulatory measures that could be implemented.

StarHub Ltd.
7-March 2018

⁴ Please see: <https://www.medialiteracycouncil.sg/Best-Practices/Authenticating-Information>