



Malaysian Communications and Multimedia Commission
Suruhanjaya Komunikasi dan Multimedia Malaysia

Public Inquiry Report

New Commission Determination on the
Mandatory Standards for the Registration of
End-Users of Prepaid Public Cellular Services

27 January 2026

This Public Inquiry Report was prepared in fulfilment of Sections 61 and 65 of the Communications and Multimedia Act 1998.

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1. Summary of the Public Inquiry

1.1 Introduction

- 1.1.1 The new Commission Determination on the Mandatory Standards for the Registration of End-Users of Prepaid Public Cellular Services ("Mandatory Standards"), is introduced to establish a clear and consistent framework for the Mandatory Standards. Once implemented, these standards will serve as a regulatory instrument under the Communications and Multimedia Act 1998 ("CMA 1998"), ensuring uniform compliance across the industry.
- 1.1.2 The proposed standards seek to address persistent concerns related to fraudulent prepaid SIM Registrations, identity misuse, and inconsistent Registration practices. By introducing a single, enforceable set of requirements, the proposed standards are intended to enhance consumer protection, promote fair competition among Service Providers and strengthen Dealers accountability.
- 1.1.3 Key elements of the proposed Mandatory Standards include:
- a) Prescribing requirements for the Mandatory Standards, for both Individual and Business Entity;
 - b) Setting out verification obligations by Service Providers and Dealers, including the adoption of secure and reliable authentication methods;
 - c) Clarifying the respective roles and responsibilities of Service Providers and Dealers; and
 - d) Providing the Commission with a stronger basis for oversight and enforcement in cases of non-compliance with the Mandatory Standards.

1.2 Public Inquiry Exercise

- 1.2.1 Pursuant to subsections 55(2), 55(4), and 61 of the CMA 1998, the Malaysian Communications and Multimedia Commission ("Commission") conducted a Public Inquiry ("PI") and issued the PI Paper on 14 October 2025. The proposed framework introduces enhanced requirements for the Registration of End-users of Prepaid

Services and the submission of relevant documentation, while further strengthening regulatory oversight, reinforcing consumer safeguards, promoting industry consistency, and supporting the development of a trusted and fraud-resilient communications ecosystem.

1.2.2 The PI invited feedback from the industry, members of the public, and relevant stakeholders on the Commission’s proposed standards. Specifically, the PI sought comments on each proposed standard and general views on the relevance and adequacy of current standards.

1.2.3 At the conclusion of the PI period, which ended at 12 noon on 28 November 2025, the Commission received fifteen (15) submissions from the following parties.

No.	Submitting Party	Submission Date
Industry Respondents		
1.	CelcomDigi Berhad (“CelcomDigi”)	28/11/2025
2.	Maxis Broadband Sdn Bhd (“Maxis”)	28/11/2025
3.	redONE Network Sdn Bhd (“redONE”)	27/11/2025
4.	Redtone Engineering & Network Services Sdn Bhd (“Redtone”)	27/11/2025
5.	TM Technology Services Sdn Bhd (“TM Tech”)	27/11/2025
6.	Tune Talk Sdn Bhd (“Tune Talk”)	27/11/2025
7.	U Mobile Sdn Bhd (“U Mobile”)	28/11/2025
8.	XOX Com Sdn Bhd (“XOX”)	28/11/2025
9.	YTL Communications Sdn Bhd (“YTLC”)	28/11/2025
10.	Service Provider #10 (“SP#10”)	27/11/2025
Public Respondents		
11.	Global System for Mobile Communications Association (“GSMA”)	27/11/2025
12.	Ezzam Mohlarom (“Ezzam Mohlarom”)	23/10/2025
13.	Herng Tun Kiat (“Herng Tun Kiat”)	28/11/2025
14.	JL Wong (“JL Wong”)	15/10/2025
15.	Mohammad Firas Faiq (“Mohammad Firas Faiq”)	31/10/2025

Table 1: Submission Received

- 1.2.4 The Commission wishes to highlight that all five (5) public respondents submitted only the soft copy of their responses; however, their submissions have been taken into account in this PI report for consideration.
- 1.2.5 The Commission has reviewed all fifteen (15) submissions, and a summary of the comments and suggestions received is outlined in this report.
- 1.2.6 The PI Report is presented within the thirty (30) day requirement from the conclusion of the PI, and the Commission may extend that period by not more than thirty (30) days, as stipulated under section 65 of the CMA 1998.
- 1.2.7 Pursuant to section 55(5) of the CMA 1998, within thirty (30) days from the publication of the PI Report, the Commission shall determine the matter by registering the new Commission Determination that will reflect the Commission's final views expressed in this PI Report in respect of the new Mandatory Standards.

1.3 Structure of the PI Report

- 1.3.1 The remainder of this PI Report is structured to provide context for the Commission's questions for comments, as follows:
 - a) Section 2 provides the summary of input received on the proposed requirements of the mandatory standards and the Commission's final views; and
 - b) Section 3 highlights the way forward.

No.	Question	Page No.
Question 1	The Commission seeks views on the proposed interpretations to be used in the Mandatory Standards.	10
Question 2	The Commission seeks views on the applicability of the Mandatory Standards, including to the Service Provider, Dealer, and any persons directed under section 51 of the CMA 1998.	18
Question 3	The Commission seeks views on the proposed requirements that prohibit the Registration of End-user for Prepaid Services by any party other than the Service Provider or an authorised Dealer.	21
Question 4	The Commission seeks views on the proposed requirements, including age restrictions and consent of End-user, in the Registration of End-user for Prepaid Services.	25
Question 5	The Commission seeks views on the proposed method of Registration for Assisted Registration and Self-registration, including the use of secure automated platforms, biometric authentication and MyDigital ID.	33
Question 6	The Commission seeks views on the proposed requirements for the Registration of Individual, including the type of information to be obtained and recorded, and the use of Identification Documents for authentication and the provision for the Commission to approve other forms of Identification Documents from time to time.	47
Question 7	The Commission seeks views on the proposed requirements for the Registration of Business Entity.	56
Question 8	The Commission seeks views on the proposed requirement of the Personal Data Protection Act 2010 in relation to Registration of Prepaid Services.	59
Question 9	The Commission seeks views on the proposed requirement for limitation of SIM Cards for Malaysian citizens/Permanent Residents/Temporary Residents.	62
Question 10	The Commission seeks views on the proposed requirement for limitation of SIM Cards for Non-Malaysian.	70
Question 11	The Commission seeks views on the proposed requirements for an Effective Registration.	77

No.	Question	Page No.
Question 12	The Commission seeks views on the proposed requirements of notification of successful Registration.	79
Question 13	The Commission seeks views on the proposed requirements of service validity for Non-Malaysian (tourists).	82
Question 14	The Commission seeks views on the proposed requirement for a record of Registration for active End-users of Prepaid Services.	88
Question 15	The Commission seeks views on the proposed requirement for a record of Registration for terminated End-users of Prepaid Services.	91
Question 16	The Commission seeks views on the proposed requirements of confidentiality and security of End-user's information.	94
Question 17	The Commission seeks views on the proposed requirements for suspension of Prepaid Services.	97
Question 18	The Commission seeks views on the proposed requirements for termination of Prepaid Services.	101
Question 19	The Commission seeks views on the proposed requirement for Registration of SIM Cards in bulk during special event.	105
Question 20	The Commission seeks views on the proposed requirements for the obligations relating to Dealer appointment and compliance.	107
Question 21	The Commission seeks views on the proposed Common Code of Conduct (Appendix B of Annexure 2).	111
Question 22	The Commission seeks views on the requirements for audit report submission and the reporting timelines.	117
Question 23	The Commission seeks views on the percentage of inaccuracy of audited verified End-user data with the Identity Authority.	122
Question 24	The Commission seeks views on the requirement for the Identification of SIM Card registered.	127
Question 25	The Commission seeks views on the requirement for the use of Watermark to secure Identification Document during Registration.	131

No.	Question	Page No.
Question 26	The Commission seeks views on the requirements for the SIM Card replacement process.	133
Question 27	The Commission seeks views on the delivery methods of SIM Cards, including Mail Delivery and Self-Collection.	140
Question 28	The Commission welcomes additional feedback, concerns, or suggestions that stakeholders or respondents believe should be taken into consideration for improving the proposed Mandatory Standards.	144

Table 2: Summary of Questions

2. Public Inquiry Input and the Commission’s View

2.1 Interpretation used in the Mandatory Standards

QUESTION 1: THE COMMISSION SEEKS VIEWS ON THE PROPOSED INTERPRETATIONS TO BE USED IN THE MANDATORY STANDARDS.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi disagrees with the proposed definitions of “False Registration” and “Unauthorised Registration” and proposes refinements to the definitions, as follows: <ul style="list-style-type: none"> ○ “False Registration”, remove references to errors in Registration data, such as missing records or invalid or inaccurate information. CelcomDigi indicates that such discrepancies do not, on their own, constitute False Registration and should not be treated as such without further verification. CelcomDigi is of the view that “False Registration” should be confined to circumstances where the Registration process is undertaken in a manner that is not compliant with Part A of the proposed Mandatory Standards: Registration. ○ “Unauthorised Registration”, remove the phrase “or replacement of an existing SIM Card”. CelcomDigi indicates that the definition should apply only to instances involving the use of another Individual’s Identification Document or Business Entity Document without consent for the purpose of registering a new SIM Card. • CelcomDigi further indicates that SIM Card replacement is an established operational process undertaken for legitimate reasons, such as loss or theft of the SIM Card, hardware faults, or upgrades. CelcomDigi asserts that SIM Card replacement is distinct from new SIM Card Registration and should not be categorised under

Submitting Party	Comments
	"Unauthorised Registration".
Maxis	<ul style="list-style-type: none"> • Maxis proposes that the phrase "(as defined below)" be removed from several defined terms, namely Assisted Registration, Business Entity Document, Dealer, End-user, False Registration, Identification Document, Pre-activated SIM Card and Self-Registration. • Maxis proposes refinements to several definitions, as follows: <ul style="list-style-type: none"> ○ "Assisted Registration", revise as the Registration process in which an End-user is unable to complete the SIM Card Registration independently via online or other automated platforms and therefore requires assistance from the Service Provider or Dealers. ○ "False Registration", remove reference to "missing records", Maxis states that Registration without corresponding records should not occur. Maxis also seeks clarification on the scope of "invalid or inaccurate information", particularly with respect to Identification Document, noting that Service Providers are not able to independently verify the authenticity or accuracy of information contained in the Identification Document. ○ "Unauthorised Registration", exclude SIM Card replacement from the definition, as SIM Card replacement does not involve the Registration of a new SIM Card but is a service recovery process for existing users, typically subject to verification requirements. • Maxis further recommends that "Unauthorised Registration" be limited to new SIM Registrations carried out without the End-user's knowledge or consent and further proposes that SIM Card replacement processes be addressed separately under customer service or fraud management procedures.
redONE	<ul style="list-style-type: none"> • redONE supports the proposed interpretations and considers them clear and consistent with current industry

Submitting Party	Comments
	practice.
Redtone	<ul style="list-style-type: none"> • Redtone indicates that they have no comments on the proposed interpretations.
TM Tech	<ul style="list-style-type: none"> • TM Tech supports the introduction of new and refined interpretations, noting that the proposed definitions provide greater clarity and reflect current industry practices and technological developments, including implementation by Service Providers and Dealers. • TM Tech agrees with most of the proposed interpretations and indicates support for the definitions of: <ul style="list-style-type: none"> i. Business Entity Document; ii. Prepaid Services End-user System; iii. Pre-activated SIM Card; iv. Self-Registration; v. Subscriber Identity Module Card or SIM Card; vi. Unauthorised Person; and vii. Watermark. • TM Tech also notes that the definition of “Subscriber Identity Module Card or SIM Card” sufficiently accommodates both physical SIMs and embedded SIMs (eSIMs). TM Tech further supports the expanded interpretation of “Dealer”, which includes persons appointed by the Service Providers as well as persons directed under Section 51 of the CMA 1998. TM Tech notes that this broader scope is relevant for entities involved in prepaid Registration activities. • TM Tech proposes refinements to several definitions, as follows: <ul style="list-style-type: none"> ○ “Termination”, revise as the permanent disabling of access to Prepaid Services, including outbound and inbound calls, SMS and data services. TM Tech notes that this distinction ensures differentiation from “Suspension”, which is temporary.

Submitting Party	Comments
	<ul style="list-style-type: none"> ○ "Unauthorised Registration", exclude SIM Card replacement and instead apply only to the Registration of a new SIM Card or the establishment of a new Prepaid Services account. TM Tech states that SIM Card replacement is a service restoration process for existing verified users, subject to operational verification parameters such as frequently dialled numbers, last reload information and proof of ownership. • TM Tech proposes the addition of one new definition, "Registered Person" to distinguish between the Individual responsible for completing the Registration and the End-user. TM Tech states that this distinction is relevant in circumstances such as Registrations for minors. TM Tech asserts that this definition supports accountability, SIM limit tracking and traceability within the prepaid ecosystem.
Tune Talk	<ul style="list-style-type: none"> • Tune Talk takes note of the proposed interpretations.
U Mobile	<ul style="list-style-type: none"> • U Mobile does not object to the proposed interpretations.
XOX	<ul style="list-style-type: none"> • XOX does not object to the proposed interpretations.
YTLC	<ul style="list-style-type: none"> • YTLC expresses support for the proposed interpretations. • YTLC proposes that the definition of "Business Entity", be expanded to include organisations registered under the Societies Act 1966, noting that such entities are legally constituted bodies under Malaysian law. • YTLC proposes the addition of one new definition, "Legal Guardian", to support circumstances in which Registration may be undertaken on behalf of minors or dependants.
SP#10	<ul style="list-style-type: none"> • SP#10 acknowledges the proposed interpretations.

Submitting Party	Comments
GSMA	<ul style="list-style-type: none"> GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> All the public respondents do not provide any feedback for this question.

Table 3: Responses to the proposed Interpretation used in Mandatory Standards

Summary of Feedback

- 2.1.1 The Commission acknowledges that five (5) out of fifteen (15) respondents, namely redONE, TM Tech, U Mobile, XOX and YTLC, agreed with the proposed interpretations under the Mandatory Standards. Two (2) respondents, CelcomDigi and Maxis, disagreed with certain proposed definitions and submitted refinements, while Tune Talk took note of the proposed interpretations without expressing direct agreement or objection. SP#10 acknowledged the proposed interpretations and Redtone has no comments on the proposed interpretations. The remaining five (5) respondents, including GSMA and members of the public did not submit any feedback for this question.
- 2.1.2 Respondents who agreed with the proposed interpretations generally considered the definitions clear and aligned with current industry practice. Several respondents also expressed support for specific terms proposed by the Commission, including “Prepaid Services End-user System”, “Self-Registration”, “Watermark” and “Unauthorised Person”. These respondents noted that the proposed interpretations would enhance clarity and support operational implementation.
- 2.1.3 The two (2) respondents disagreed with definitions of “False Registration”, “Unauthorised Registration” and “Assisted Registration”, thus proposed their refinements. These respondents emphasised the importance of distinguishing between new SIM Registration and SIM Card replacement processes, noting that SIM Card replacement is an operational servicing process for existing users.
- 2.1.4 YTLC recommended introducing a definition for “Legal Guardian” and expanding the definition of “Business Entity” to include organisations registered under the Societies Act 1966.

Commission's View

Phrase of "as defined below"

- 2.1.5 The Commission notes the proposal to remove the phrase "as defined below" from several defined terms. The Commission is of the view that the current drafting provides clarity by signalling that the referenced terms have their interpretation set out in the Mandatory Standards.
- 2.1.6 Accordingly, the Commission is to retain this phrase in its present form.

Definition of False Registration

- 2.1.7 The Commission notes the concerns raised regarding the reference to "missing records" in the definition of "False Registration". The Commission clarifies that the intent of the definition is to capture Registrations that cannot be validated against authoritative Identification Documents, rather than internal system or operational issues in isolation.
- 2.1.8 The Commission further clarifies that Service Providers and Dealers are not expected to independently verify the authenticity or accuracy of information contained in Identification Documents beyond the prescribed verification mechanisms, and that determinations of invalidity are based on verification outcomes from the relevant Identity Authority.
- 2.1.9 Accordingly, the Commission agrees to refine the wording by replacing the phrase "missing records" with "no record found", and maintains that where verification confirms that an Identification Document is invalid, no record is found, or Registration data cannot be validated against authoritative records, the Registration shall be deemed invalid under the Mandatory Standards, irrespective of intent. The Commission is to **revise** the definition of "False Registration" as follows:

"False Registration" means a Registration (as defined below) that is deemed invalid, due to, but not limited to, invalid Identification Document (as defined below), errors in the Registration data, including no record found, invalid or inaccurate information.

Definition of Assisted Registration

- 2.1.10 The Commission notes the proposal to limit the definition of "Assisted

Registration” to situations where an End-user is unable to complete Registration independently via online or secured automated platforms.

- 2.1.11 The Commission observes that the existing drafting appropriately captures all Registration activities undertaken with the assistance of a Service Providers or Dealers, including scenarios where End-user may choose or require in-person assistance regardless of their ability to self-register.
- 2.1.12 Accordingly, the Commission does not agree to narrow the scope and is to retain the current proposed definition, which provides sufficient regulatory clarity and flexibility across different Registration channels.

Definition of Unauthorised Registration

- 2.1.13 The Commission notes the feedback in distinguishing SIM Card replacement from the Registration of a new SIM Card and acknowledges that SIM Card replacement is generally undertaken as an operational servicing process for an existing End-user.
- 2.1.14 The Commission is of the view that the definition of “Unauthorised Registration” should be confined to conduct occurring for the purpose of Registration, and should not extend to operational processes that are distinct from the Registration of a new SIM Card.
- 2.1.15 Accordingly, the Commission agrees to amend the definition of “Unauthorised Registration” by removing the reference to the replacement of an existing SIM Card, and confine its application to unauthorised use of Identification Documents in connection with Registration. The Commission is to **revise** the definition of “Unauthorised Registration” as follows:

“Unauthorised Registration” means the use of another End-user’s Identification Document or Business Entity Document without consent by any third party, which may include, but is not limited to, disclosing the Identification Document or Business Entity Document, for the purpose of Registration of a new SIM Card.

Definition of Termination

- 2.1.16 The Commission notes the feedback seeking further clarification on the definition of “Termination”.
- 2.1.17 Having considered the feedback submitted, the Commission is of the

view that the existing definition is sufficiently clear and is therefore to be retained without amendment.

Definition of Legal Guardian

2.1.18 The Commission recognises that minors may not have full legal capacity to assume responsibility for the Registration and use of Prepaid Services, and that a parent or legal guardian may act on the minor's behalf.

2.1.19 For clarity, the Commission is to **revise the term** "legal guardian" to "guardian", refer as an adult who registers on behalf of a minor for the purposes of Registration, and who assumes responsibility for the accuracy of the Registration information and compliance with the applicable requirements under the Mandatory Standards.

Definition of Multi-Factor Authentication

2.1.20 The Commission notes that clarification has been sought on the application and scope of "Multi-Factor Authentication" for the purposes of Registration.

2.1.21 For clarity, the Commission explains that Multi-Factor Authentication, as defined under the Mandatory Standards, refers to the use of at least two (2) authentication factors during Registration. Such factors may comprise different forms of authentication, including biometric factors, system-verified or possession-based factors (such as MyDigital ID, NRD-certified chip content, IMM13 certification or financial account verification), and knowledge-based factors (such as a PIN or verification code). The Commission may recognise additional authentication methods from time to time.

Definition of Business Entity

2.1.22 The Commission notes the proposal to expand the definition of "Business Entity" to include organisations registered under the Societies Act 1966 and acknowledges that such organisations are legally constituted bodies under Malaysian law.

2.1.23 However, the Commission observes that entities registered under the Societies Act 1966 differ from commercial entities in governance, accountability and identity-verification structures, and that the fluidity of office bearers may pose challenges to traceability and enforcement.

2.1.24 Accordingly, the Commission is to retain the initial proposed definition of “Business Entity” and does not include organisations registered under the Societies Act 1966 at this stage.

2.2 Licensees and persons subject to the Mandatory Standards

QUESTION 2: THE COMMISSION SEEKS VIEWS ON THE APPLICABILITY OF THE MANDATORY STANDARDS, INCLUDING TO THE SERVICE PROVIDERS, DEALERS, AND ANY PERSONS DIRECTED UNDER SECTION 51 OF THE CMA 1998.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi agrees with the proposed applicability of the Mandatory Standards and supports extending the obligations to Service Providers, Dealers, and any persons directed under section 51 of the CMA 1998.
Maxis	<ul style="list-style-type: none"> • Maxis supports the inclusion of Dealers within the scope of the Mandatory Standards. Maxis notes that this alignment enables the Commission to take direct enforcement action against non-compliant Dealers rather than relying solely on Service Providers to implement corrective measures. Maxis considers this approach to enhance accountability across the value chain and strengthen the integrity of the prepaid Registration process.
redONE	<ul style="list-style-type: none"> • redONE indicates that the Mandatory Standards are applicable appropriately and comprehensively to all Service Providers.
Redtone	<ul style="list-style-type: none"> • Redtone indicates that they have no comments on the applicability of the Mandatory Standards.
TM Tech	<ul style="list-style-type: none"> • TM Tech agrees with the proposed applicability of the Mandatory Standards to Service Providers, Dealers and any person directed under section 51 of the CMA 1998. TM

Submitting Party	Comments
	<p>Tech supports extending regulatory obligations to Dealers as they play a direct role in the Registration process and should therefore be subject to clear and enforceable requirements.</p> <ul style="list-style-type: none"> • TM Tech emphasises that each party’s responsibility should correspond to its level of operational control. Service Providers should remain accountable for governance measures such as Dealer appointment, training, system controls and audits, while Dealers should bear direct responsibility for their own conduct, data-handling practices and compliance with the Mandatory Standards. TM Tech further proposes that Service Providers should not be held liable for actions or omissions by Dealers that fall outside their operational control or occur contrary to established procedures. TM Tech considers this delineation essential to ensure proportional, transparent and enforceable accountability across the prepaid Registration ecosystem.
Tune Talk	<ul style="list-style-type: none"> • Tune Talk takes note of the proposed applicability of the Mandatory Standards to Service Providers, Dealers and any persons directed under section 51 of the CMA 1998.
U Mobile	<ul style="list-style-type: none"> • U Mobile does not object to the proposed applicability of the Mandatory Standards to Service Providers, Dealers and any persons directed under section 51 of the CMA 1998.
XOX	<ul style="list-style-type: none"> • XOX does not object to the proposed applicability of the Mandatory Standards to Service Providers, Dealers and persons directed under section 51 of the CMA 1998.
YTLC	<ul style="list-style-type: none"> • YTLC supports the inclusion of both Service Providers and Dealers under the scope of the Mandatory Standards.
SP#10	<ul style="list-style-type: none"> • SP#10 acknowledges the proposed requirement.

Submitting Party	Comments
GSMA	<ul style="list-style-type: none"> GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> All the public respondents do not provide any feedback for this question.

Table 4: Responses on Licensees and persons subject to the Mandatory Standards

Summary of Feedback

- 2.2.1 The Commission notes that seven (7) out of fifteen (15) respondents, namely CelcomDigi, Maxis, redONE, TM Tech, U Mobile, XOX and YTLC, agreed with the proposed applicability of the Mandatory Standards to Service Providers, Dealers and persons directed under section 51 of the CMA 1998. These respondents generally support the extension of regulatory obligations to the Dealers, recognising their direct role in the prepaid Registration process.
- 2.2.2 Several respondents also highlighted that subjecting Dealers to the Mandatory Standards will enhance accountability across the distribution chain and support more effective enforcement. Maxis in particular emphasised that direct enforceability against the Dealers strengthens oversight and reduces reliance on the Service Providers to implement corrective actions.
- 2.2.3 The Commission further notes that Tune Talk took note of the proposed applicability without expressing direct agreement or objection. SP#10 acknowledged the proposed requirement. Redtone has no comment on the proposed requirement. The remaining respondents, including GSMA and members of the public, did not submit any feedback on this question.
- 2.2.4 TM Tech proposed that responsibilities under the Mandatory Standards should correspond to each party's operational control. TM Tech submitted that the Service Providers should remain accountable for governance functions such as Dealer's appointment, training, system controls and audits, while Dealers should bear responsibility for their own conduct and compliance with the Mandatory Standards. TM Tech also recommended that the Service Providers should not be held liable

for actions or omissions by the Dealers that fall outside their control.

Commission's View

- 2.2.5 The Commission notes support for the proposed scope of applicability, recognising that extending the Mandatory Standards to the Dealers strengthens regulatory consistency, enhances Registration integrity and supports proportionate enforcement.
- 2.2.6 The Commission emphasises that responsibilities under the Mandatory Standards shall align with each party's level of operational control to ensure clear accountability.
- 2.2.7 Accordingly, the Commission is to implement the proposed applicability of the Mandatory Standards to Service Providers, Dealers, and any persons directed under section 51 of the CMA 1998 through a Commission Direction.

2.3 Requirement for Registration

QUESTION 3: THE COMMISSION SEEKS VIEWS ON THE PROPOSED REQUIREMENTS THAT PROHIBIT THE REGISTRATION OF END-USER FOR PREPAID SERVICES BY ANY PARTY OTHER THAN THE SERVICE PROVIDER OR AN AUTHORISED DEALER.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> CelcomDigi agrees with the proposed requirement prohibiting the Registration of End-user for Prepaid Services by any party other than the Service Providers or an authorised Dealer.
Maxis	<ul style="list-style-type: none"> Maxis disagrees with the proposed requirement, indicating that all prepaid Registrations are already strictly performed through Maxis' registered and authorised Dealer operating under formal agreements. Its Registration systems only permit authorised Dealer logins, ensuring complete traceability and accountability for each transaction.

Submitting Party	Comments
	<ul style="list-style-type: none"> • Therein, Maxis is of the view that the proposed requirement under paragraph 6.5, which stipulates that the Registration of Prepaid Services must not be carried out by an Unauthorised Person is duplicative of existing operational safeguards and may introduce unnecessary ambiguity or overlapping liability for processes already well-controlled within its current Dealer governance framework.
redONE	<ul style="list-style-type: none"> • redONE agrees with the proposed requirement that prohibits the Registration of End-user for Prepaid Services by any party other than the Service Providers or an authorised Dealer. redONE considers that such a restriction is essential to maintaining Registration integrity and accountability, and notes that Service Providers, including MVNOs, must ensure that adequate controls are implemented to prevent Registration activities by unauthorised parties.
Redtone	<ul style="list-style-type: none"> • Redtone indicates that they have no comments on the proposed requirement that prohibits the Registration of End-user for Prepaid Services by any party other than the Service Providers or an authorised Dealer.
TM Tech	<ul style="list-style-type: none"> • TM Tech supports the proposed requirement prohibiting the Registration of End-user for Prepaid Services by any party other than the Service Providers or an authorised Dealer. TM Tech agrees that restricting Registration activities to authorised entities is necessary to safeguard consumer information, prevent fraudulent Registrations, and preserve traceability across the prepaid ecosystem. • TM Tech highlights that the requirement should be applied in a manner that reflects the distinct operational roles of Service Providers and Dealers. According to TM Tech, the Service Providers should be responsible for establishing secure systems, governance protocols and access controls that limit Registration capabilities to authorised Dealer, while Dealers should be accountable for the proper

Submitting Party	Comments
	<p>execution of Registration activities, including identity verification, data accuracy and compliance with operational requirements.</p> <ul style="list-style-type: none"> • TM Tech further notes that the Service Providers should not be held liable for unauthorised actions occurring outside their knowledge or control, such as attempts by third parties or Dealer personnel acting beyond approved authorisation. TM Tech proposes that obligations on the Service Providers should reasonably focus on governance, monitoring and corrective measures when non-compliance is identified. • TM Tech considers that the proposed requirement complements broader regulatory objectives by ensuring that Registration processes remain secure, auditable and fully traceable, while maintaining proportionate and practical accountability across Service Providers and Dealers.
Tune Talk	<ul style="list-style-type: none"> • Tune Talk agrees with the proposed requirement prohibiting the Registration of End-user for Prepaid Services by any party other than the Service Providers or an authorised Dealer. Tune Talk states that limiting Registration activities exclusively to authorised entities is essential to safeguard the integrity and accountability of the Registration process. Tune Talk further notes that Service Providers must implement robust controls to prevent any unauthorised Registration activities.
U Mobile	<ul style="list-style-type: none"> • U Mobile does not object to the proposed requirement.
XOX	<ul style="list-style-type: none"> • XOX does not object to the proposed requirement.
YTLC	<ul style="list-style-type: none"> • YTLC supports the proposed requirement, noting that the requirement is aligned with existing industry and operational practice.

Submitting Party	Comments
SP#10	<ul style="list-style-type: none"> • SP#10 acknowledges the proposed requirement.
GSMA	<ul style="list-style-type: none"> • GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> • The respondents did not provide any feedback for this question.

Table 5: Responses to the proposed requirements that prohibit the Registration of End-user for Prepaid Services by any party other than the Service Provider or an authorised Dealer

Summary of Feedback

- 2.3.1 The Commission notes that seven (7) out of fifteen (15) respondents, namely CelcomDigi, redONE, TM Tech, Tune Talk, U Mobile, XOX and YTLC, agreed with the proposed requirement under paragraph 6.5 that the Registration of Prepaid Services for any End-user shall not be carried out by an Unauthorised Person. These respondents generally consider the requirement necessary to safeguard Registration integrity, prevent fraudulent Registrations, and ensure accountability and traceability within the prepaid Registration ecosystem.
- 2.3.2 Maxis, on the other hand, expressly disagreed with this requirement and proposed the deletion of paragraph 6.5, indicating that this restriction is duplicative. Maxis explained that their existing Registration systems already restrict access exclusively to authorised Dealer through controlled system logins, ensuring full traceability and accountability without the need for an additional regulatory requirement.
- 2.3.3 Redtone has no comment for the proposed requirement. SP#10 acknowledged the proposed requirements. The Commission further notes that the remaining five (5) respondents, namely GSMA and members of the public did not submit any feedback for this question.

Commission's View

- 2.3.4 Overall, feedback received reflects strong industry support for restricting prepaid Registration activities to authorised Service

Providers and Dealers, with concerns raised primarily by a single respondent on potential duplication and operational overlap, rather than opposition to the underlying policy objective of preventing unauthorised Registrations.

2.3.5 The Commission notes broad support for the proposed requirement, with only one respondent raising concerns on operational grounds rather than principle, indicating strong industry alignment with the Commission’s objective of strengthening governance over prepaid Registration.

2.3.6 Having considered the feedback, the Commission is to **retain** the proposed requirement, as limiting Registration to Service Providers and authorised Dealers is necessary to ensure Registration integrity, accountability and to prevent unauthorised or fraudulent Registrations.

QUESTION 4: THE COMMISSION SEEKS VIEWS ON THE PROPOSED REQUIREMENTS, INCLUDING AGE RESTRICTIONS AND CONSENT OF THE END-USER, IN THE REGISTRATION OF END-USER FOR PREPAID SERVICES.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi agrees with the restriction that neither the Service Providers nor the Dealers may register an End-user who is below twelve (12) years of age. • CelcomDigi proposes that the requirement on End-user consent be aligned with guidelines issued by the Personal Data Protection Commissioner or the Personal Data Protection Department under the Personal Data Protection Act 2010 (“PDPA 2010”). • CelcomDigi proposes that Service Providers be allowed to record the consent of the parent or legal guardian who registers on the minor’s behalf, as part of the Service Provider’s business processes. • CelcomDigi requests that the maximum SIM Card limit applicable to minors (as End-user) be clearly stated in the Mandatory Standards and aligned with the limits

Submitting Party	Comments
	<p>applicable to adults.</p> <ul style="list-style-type: none"> • CelcomDigi proposes revised wording for paragraph 6.4 of the Mandatory Standards to clarify that: <ul style="list-style-type: none"> ○ No End-user below twelve (12) years old may be registered; ○ Minors aged twelve (12) to seventeen (17) must have a parent or legal guardian register on their behalf, with the minor listed as the End-user; ○ The maximum number of SIM Cards for the minor must be recorded separately from the parent’s or legal guardian’s maximum SIM Card limit.
Maxis	<ul style="list-style-type: none"> • Maxis supports the proposal that minors aged twelve (12) to seventeen (17) must have a parent or legal guardian register on their behalf, with the minor listed as the End-user.
redONE	<ul style="list-style-type: none"> • redONE proposes that if Registration under a minor’s name is permitted, capturing the name and ID of the legal guardian in the system should be sufficient as supporting information. • redONE favours the option of snapping a photo of the parent’s or legal guardian’s IC and storing their name and IC number in the system as acceptable documentation of consent. • redONE notes that Service Providers and Dealer currently face challenges in identifying and verifying who the legal guardian is. • To protect minors, redONE supports age restrictions that disallow Registration for children below twelve (12) years old and require parental consent for minors aged twelve (12) to seventeen (17) years old. • redONE emphasises that these safeguards should be applied consistently across all Service Providers and

Submitting Party	Comments
	Dealers, including MVNOs.
Redtone	<ul style="list-style-type: none"> Redtone indicates that they have no comments on the proposed age restrictions, as the company only accepts Registrations from Individuals aged eighteen (18) and above.
TM Tech	<ul style="list-style-type: none"> TM Tech supports the Commission’s objective of ensuring minors are registered responsibly under parental or guardian oversight, acknowledging that minors cannot legally enter contracts and that parental responsibility must be clearly established. TM Tech’s position is that parental responsibility can be achieved without requiring system-level separation between “Registered Person” and “End-user,” proposing that the parent remain the Registered Person while the minor is recognised as the user at the policy level. TM Tech highlights that treating the parent as both Registered Person and End-user creates factual inaccuracies in subscriber records, undermining database integrity for verification, lawful interception, safety escalation, and fraud investigations. TM Tech notes that responsibility and identity are distinct, and accurate system records should reflect the actual user, the minor, while parental responsibility derives from consent, similar to banking sector models where minors hold accounts with parental authorisation. TM Tech emphasises that Malaysia’s move toward MyDigital ID requires accurate identification of actual End-user, including minors, to ensure compatibility with digital identity verification as the ecosystem evolves. TM Tech reiterates that minors must be recognised as End-user to ensure the SIM limit framework functions correctly, as registering minors under parents’ identities would cause parents to appear to exceed their SIM limit

Submitting Party	Comments
	<p>while the minor’s entitlement is never activated.</p> <ul style="list-style-type: none"> • TM Tech raises concerns about unnecessary data collection if minors’ SIMs are registered under parents, noting this would require storing parental identification data that is not necessary for identifying the actual user, conflicting with PDPA 2010 principles. • TM Tech proposes adopting a clear definition of “Registered Person” to distinguish between the person authorising the service and the person actually using it, enabling accurate subscriber records while retaining parental legal responsibility. • TM Tech recommends clarifying that SIMs authorised for minors do not count toward the parent’s SIM limit and that minors are entitled to their own SIM limit of two prepaid SIMs, ensuring proper enforcement of the Determination. • TM Tech proposes operational requirements such as restricting minor Registrations to physical channels for proper verification, avoiding mandatory collection of guardian’s Identification Documents, and allowing Service Provider's flexibility in capturing parental consent. • TM Tech concludes that recognising the minor as the End-user while retaining parental responsibility ensures database accuracy, supports SIM-limit enforcement, aligns with PDPA 2010 principles, and is consistent with practices in other sectors and with the government’s MyDigital ID direction.
Tune Talk	<ul style="list-style-type: none"> • Tune Talk states that since Registration is only permitted for minors aged 12 to 17 years, Service Providers should be required only to sight the parent or legal guardian’s details for verification prior to Registration, and such information should not be retained once verification is completed.

Submitting Party	Comments
	<ul style="list-style-type: none"> • Tune Talk emphasises that Service Providers should not be held responsible for Registrations of minors that have been verified through sighting, as Service Providers are unable to confirm guardianship relationships. Tune Talk notes that verification through sighting of a birth certificate may be conducted when parent details are provided.
U Mobile	<ul style="list-style-type: none"> • U Mobile acknowledges the Commission’s proposed age restriction requiring parental or legal guardian Registration for minors aged twelve (12) to seventeen (17) years. • U Mobile highlights a practical limitation, noting that Service Providers must accept guardian declarations at face value during Registration, as no mechanism currently exists to independently verify the legitimacy of claimed guardianship relationships.
XOX	<ul style="list-style-type: none"> • XOX does not object to the proposed age restrictions. • XOX states that End-user consent is deemed to be given since a parent or legal guardian is required to register on behalf of the minor. • XOX notes that Service Providers are unable to verify whether the parent or legal guardian is an authorised person. • XOX seeks clarity from the Commission on how such verification is expected to be carried out.
YTLC	<ul style="list-style-type: none"> • YTLC reiterates that significant challenges arise when requiring YTLC staff or Dealer to determine the actual relationship between a minor and a parent or legal guardian, particularly in the absence of a clear definition of “Legal Guardian.” • YTLC highlights that under Malaysian laws including the Adoption Act 1952, the Guardianship of Infants Act 1961,

Submitting Party	Comments
	<p>and the Law Reform (Marriage and Divorce) Act 1976, legal guardianship typically requires formal court orders, which Service Providers are not equipped to assess or validate without official certification or supporting systems.</p> <ul style="list-style-type: none"> • YTLC notes that inconsistencies between names on NRICs and birth certificates (e.g., omission of bin/binti, A/P, A/L, or typographical errors) can obstruct the verification process. • YTLC observes that the Mandatory Standards do not distinguish between Malaysian and foreign minors, and explains that verification for foreign minors is even more complex due to the variety of foreign-issued documents, differing formats and languages, and the fact that foreign guardians may not be recognised as “Legal Guardians” under Malaysian law without formal court appointments. • YTLC states that Service Providers may also be unable to validate the authenticity of documents issued outside Malaysia, especially in situations where embassies or formal government support are unavailable. • YTLC proposes that MCMC provide a clear definition of legal guardianship and specify the list of acceptable documents for verification to ensure consistent and practical implementation. • YTLC requests that MCMC take these real-world complexities into consideration and avoid placing the burden of legal interpretation on Service Providers or Dealer.
SP#10	<ul style="list-style-type: none"> • SP#10 seeks clarification on the proposed requirements.
GSMA	<ul style="list-style-type: none"> • GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> • Ezzam Mohlarom supports age-based restrictions and endorses limiting minors’ use of devices and social media

Submitting Party	Comments
	for safety and protective purposes.

Table 6: Responses to the proposed requirements, including age restrictions and consent of the End-user, in the Registration of End-user for Prepaid Services

Summary of Feedback

- 2.3.7 The Commission notes that three (3) out of fifteen (15) respondents, namely CelcomDigi, Maxis and XOX, agreed with the proposed requirement under paragraph 6.4, which prohibits the Registration of an End-user below twelve (12) years of age and requires minors aged twelve (12) to seventeen (17) to be registered by a parent or legal guardian, with the minor listed as the End-user. These respondents support the policy intent to safeguard minors and prevent unauthorised or irresponsible Registrations.
- 2.3.8 While agreeing with the policy intent, CelcomDigi proposed refinements relating to implementation. CelcomDigi sought alignment with the PDPA 2010, clarification on the SIM Card limit applicable to minors, and confirmation that a minor’s SIM Card entitlement should be recorded separately from the parent’s or legal guardian’s SIM Card limit. RedONE supported capturing parental or guardian details as evidence of consent, but highlighted practical challenges faced by Service Providers and Dealers in verifying guardianship relationships and emphasised the need for consistent application across all Service Providers and MVNOs.
- 2.3.9 The Commission further notes that four (4) respondents, namely TM Tech, Tune Talk, U Mobile and YTLC, took note of the proposal without expressing direct agreement or objection with some of them sought clarification or proposed implementation refinements. These respondents broadly acknowledged the intent of the age restriction but highlighted operational limitations, including the inability of Service Providers and Dealers to independently verify legal guardianship, uncertainty over acceptable proof of relationship, treatment of SIM Card limits for minors, and concerns over PDPA 2010 compliance and subscriber record accuracy.
- 2.3.10 In particular, TM Tech supported the objective of responsible minor Registration but raised substantive concerns regarding system-level accuracy, database integrity and SIM Card limit enforcement if minors

are not clearly distinguished as End-user. Tune Talk and U Mobile highlighted that guardianship declarations would necessarily be accepted at face value due to the absence of authoritative verification mechanisms.

- 2.3.11 The Commission also notes that one (1) respondent, namely Redtone, provided no comments on the proposed requirement, as it only accepts Registrations from Individuals aged eighteen (18) and above. Meanwhile, SP#10 sought few clarifications on the proposed requirements.
- 2.3.12 One (1) public respondent, Ezzam Mohlarom, expressly supported age-based controls as part of broader child-protection measures. The remaining four (4) respondents, namely GSMA and three (3) other members of the public, did not submit any feedback for this question.

Commission's View

- 2.3.13 The Commission observes that no respondent objected to the age-based restriction or the requirement for parental or guardian involvement. Feedback focused on implementation clarity and operational practicality rather than opposition to the policy objective of safeguarding minors.
- 2.3.14 The Commission clarifies that Service Providers and Dealers are not required to adjudicate guardianship beyond reasonable verification/sighting of documents. Registration may proceed based on parental or guardian declaration and prescribed verification measures, without imposing obligations beyond reasonable verification.
- 2.3.15 The Commission acknowledges concerns relating to data minimisation, PDPA 2010 compliance, subscriber record accuracy and enforcement effectiveness. For the purpose of clarity, further provisions will be incorporated in the Mandatory Standards to stipulate that minors shall be recorded as End-user, that only necessary information shall be collected, and that acceptable verification approaches shall be specified, including for foreign minors. In line with this, the SIM Card limit shall be applied under the said End-user and shall not be counted towards the parent's or guardian's SIM Card limitation.
- 2.3.16 From an enforcement perspective, strengthened age-based controls and clear consent requirements remain necessary and proportionate measures to mitigate misuse of prepaid SIM Cards.

2.3.17 Accordingly, the Commission is to **revise paragraph 6.4** as follows:

"6.4 The Service Provider or Dealer shall not register any End-user who is below the age of twelve (12).

6.5 Registration for any minor who is between the ages of twelve (12) and seventeen (17) years old shall be carried out by a parent or guardian on behalf of the minor, subject to the following:

- (a) The Registration of the minor as the End-user shall be carried out in accordance with paragraph 7; and*
- (b) The Service Provider or the Dealer shall obtain the parent or guardian's information including, but not limited to, name, identification number, and address as per the Identification Document, contact number, relationship with the minor, and the parent's or guardian's consent to complete the Registration of the minor."*

2.4 Method of Registration for Individual and Business Entity

QUESTION 5: THE COMMISSION SEEKS VIEWS ON THE PROPOSED METHOD OF REGISTRATION FOR ASSISTED REGISTRATION AND SELF-REGISTRATION, INCLUDING THE USE OF SECURE AUTOMATED PLATFORMS, BIOMETRIC AUTHENTICATION AND MYDIGITAL ID.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi supports the proposed method of verification for Assisted Registration for Malaysians, Permanent Residents and Temporary Residents, which requires verification of the Identification Document via MyKad reader with biometric authentication (fingerprint). CelcomDigi refers to recent announcements on amendments to the National Registration Act 1959, noting that future identity cards are expected to include enhanced biometric features. • CelcomDigi highlights several operational considerations relating to biometric collection, including uncertainties in the National Registration Department's roadmap for collecting ten fingerprints, the current recording of

Submitting Party	Comments
	<p>thumbprint only and the possibility of two segments of MyKad holders during the transition period. CelcomDigi notes that this may require Service Providers to procure different sets of biometric scanners.</p> <ul style="list-style-type: none"> • CelcomDigi proposes that the implementation of biometric authentication (fingerprint) be aligned with the National Registration Department’s confirmed roadmap for the issuance of the new identity card. In the interim, CelcomDigi proposes that Service Providers be allowed to continue using the MyKad reader for prepaid SIM Registration. • Self-Registration (Malaysian) <p>CelcomDigi notes the government’s stated targets for MyDigital ID adoption. CelcomDigi supports MyDigital ID as a verification mechanism but highlights that mandatory use of MyDigital ID for Self-Registration may pose challenges for customers who have not yet registered for MyDigital ID or who lack flexibility to visit physical outlets. CelcomDigi proposes that customers be given options and considers facial recognition to be an adequate measure for Malaysian Self-Registration.</p> • Self-Registration (Non-Malaysian) <p>CelcomDigi is of the view that Non-Malaysian End-users should be allowed to self-register. CelcomDigi notes that many Non-Malaysian users rely on online Self-Registration due to limited access to physical outlets during business hours. CelcomDigi considers that the current online Registration process provides adequate safeguards.</p> • Implementation Period and Operational Requirements <p>CelcomDigi proposes an implementation period of 18 months for the required procurement, customer-facing and back-end systems assessment, and deployment of biometric scanners and passport readers across all channels.</p>

Submitting Party	Comments
	<ul style="list-style-type: none"> • Other Considerations <p>CelcomDigi highlights that passport Registration for Non-Malaysian users is dependent on chip readability and seeks the Commission’s guidance on handling cases involving non-chip-based passports.</p>
Maxis	<ul style="list-style-type: none"> • Maxis supports with certain elements of the proposed methods of Registration, particularly the requirement to use passport readers for the Registration of Non-Malaysian End-users. Maxis states that passport readers with machine-readable zone (“MRZ”) capabilities and chip authentication can support the intended verification objectives. Maxis also agrees with the allowance for Self-Registration by Non-Malaysian End-users. • Maxis notes the Commission’s proposal to require the use of MyKad readers equipped with fingerprint biometric capability for Malaysian Registrations. However, Maxis highlights that implementation of this requirement will involve significant end-to-end operational planning, including the procurement of a large volume of biometric scanners for nationwide deployment, software development, backend system integration, quality assurance and testing, and Dealer training. Maxis states that these activities, taken collectively, would require an estimated eighteen (18) months to complete. Maxis further notes that logistical constraints, especially in rural and remote areas, may affect timely deployment. • Maxis does not support the proposal to mandate the use of MyDigital ID as the sole method of Self-Registration for Malaysians at this stage. Maxis highlights that MyDigital ID certificates are subject to annual renewal and considers that Service Providers should not be held accountable for failed Registrations due to expired certificates. Maxis proposes that the existing eKYC method, which uses facial recognition matched against the NRIC photograph, continue to be permitted as an alternative verification mechanism.

Submitting Party	Comments
	<ul style="list-style-type: none"> • Maxis proposes that the Commission consider implementation flexibility in situations where infrastructure limitations impede the effective use of biometric devices or passport readers. Maxis further recommends that industry-wide technical standards or accuracy thresholds for passport readers be developed through consultation with Service Providers to ensure consistent performance and minimise discrepancies during verification.
redONE	<ul style="list-style-type: none"> • redONE takes note of the Commission’s proposal under paragraph 7.1, which requires Service Providers and Dealers to use secured automated platforms with Multi-Factor Authentication to verify the authenticity of Identification Document. • In relation to paragraph 7.1.1(a) on Assisted Registration for Malaysian citizens, Permanent Residents and Temporary Residents using a MyKad reader with fingerprint biometric authentication, redONE takes note of the requirement and assumes that MyDigital ID may serve as an alternative verification mechanism where applicable. • For paragraph 7.1.1(b) on Assisted Registration for Non-Malaysians using a passport reader with biometric facial authentication, redONE highlights that its current systems do not support passport reader capability. redONE further notes that not all passports contain embedded NFC chips, which limits the feasibility of NFC-based verification. As an alternative, redONE proposes the use of Optical Character Recognition (“OCR”) technology combined with facial recognition for Non-Malaysian Registrations. • redONE takes note of the Commission’s proposal under paragraph 7.1.1(c) for IMM13 holders. • redONE additionally seeks clarification on the verification process applicable to MyKAS and MyPR holders and reiterates that OCR combined with facial recognition is its preferred verification approach for these user categories.

Submitting Party	Comments
	<ul style="list-style-type: none"> • redONE proposes the use of OCR based document capture paired with facial recognition as an enhanced verification method for Non-Malaysian Registrations to improve accuracy and streamline onboarding.
Redtone	<ul style="list-style-type: none"> • Redtone indicates that they have no comments on the Commission’s proposed methods of Registration for Assisted Registration and Self-Registration.
TM Tech	<ul style="list-style-type: none"> • TM Tech supports the Commission’s intention to strengthen the security and integrity of prepaid SIM Registration through enhanced identity verification, secure automated platforms and Multi-Factor Authentication (“MFA”). TM Tech notes that these measures are important in addressing fraud risks and improving traceability across the prepaid ecosystem. TM Tech, however, proposes that implementation remain flexible, practical and technology-neutral to allow Service Providers to adopt MFA enabled methods suited to their respective systems and operational environments. • TM Tech agrees with the requirement for secured automated platforms supported by MFA, but notes that prescribing specific hardware based verification methods may not be operationally feasible across all Service Providers and Dealer environments. TM Tech highlights that identity verification architectures vary across the industry, Dealers infrastructure and device capabilities differ widely, and a rigid hardware specific mandate may limit the ability to deploy strengthened verification methods consistently at scale. TM Tech notes that secure alternatives such as eKYC with liveness detection or device-based biometric authentication can provide equivalent verification assurance while supporting broader operational flexibility. • TM Tech acknowledges the Commission’s direction to position MyDigital ID as the primary verification channel for Self-Registration and supports the long term national strategy to strengthen digital identity assurance.

Submitting Party	Comments
	<p>However, TM Tech highlights several practical considerations, including the potential for service interruptions, evolving ecosystem maturity, and the risk that legitimate Registrations may be disrupted if no fallback mechanism is available when MyDigital ID is temporarily inaccessible or undergoing updates.</p> <ul style="list-style-type: none"> • TM Tech notes that limiting Non-Malaysians to Assisted Registration channels may create operational challenges and reduce customer experience quality. TM Tech highlights that many foreign workers, students, long term residents and travellers expect digital onboarding and require immediate activation, and that mature regulatory environments internationally allow foreigners to self-register using secure MFA enabled eKYC processes. TM Tech considers that similarly flexible approaches may be required to support accessibility and competitiveness. • TM Tech proposes that MFA secured verification be maintained as the core requirement, while allowing Service Providers the flexibility to adopt any verification method that achieves the required security outcome. TM Tech considers that this ensures strong identity assurance without prescribing specific devices or modalities. • TM Tech proposes removing the requirement for front and back MyKad scanning in Self-Registration channels where identity verification is already performed securely within the MyDigital ID ecosystem, noting concerns about unnecessary personal data capture and increased processing burdens. • TM Tech proposes allowing Service Providers to use secure MFA based fallback verification processes when MyDigital ID is unavailable, unstable or otherwise unable to support Registration workflows, to ensure continuity of onboarding. • TM Tech proposes allowing foreigners to self-register using MFA enabled verification methods supported by Service Providers, noting that such flexibility aligns with international practice and supports operational practicality

Submitting Party	Comments
	without compromising verification standards.
Tune Talk	<ul style="list-style-type: none"> • Tune Talk takes note of the proposal for Assisted Registration using MyKad reader verification and understands that MyDigital ID with thumbprint verification may serve as an alternative option. • Tune Talk highlights that its current systems do not have passport reader capability and notes that not all passports contain embedded NFC chips, which may limit the feasibility of the proposed verification approach. Tune Talk proposes the use of OCR combined with facial recognition as an alternative verification method. • Tune Talk acknowledges the requirement for Assisted Registration involving IMM13 document holders. • Tune Talk requests clarification on the verification process for MyKAS and MyPR holders and proposes OCR combined with facial recognition as a feasible solution (additional Assisted Registration requirement). • For Self-Registration, Tune Talk proposes enabling passport holders to self-register through Service Providers' Application Programming Interface ("API") integration with the Immigration Department of Malaysia ("IDM") to allow real-time passport validity and authenticity verification.
U Mobile	<ul style="list-style-type: none"> • U Mobile notes the Commission's proposed enhancements to the methods of Registration and provides several observations relating to feasibility, operational readiness and implementation practicality under the strengthened verification framework. • U Mobile requests a 24-month transitional period for full implementation of the proposed requirements, emphasising that a longer timeline is necessary to support comprehensive system development, biometric integration and end-to-end readiness across all

Submitting Party	Comments
	<p>Registration channels.</p> <ul style="list-style-type: none"> • U Mobile proposes that the Commission allow alternative Registration methods for Individuals who may be unable to complete biometric authentication due to physical limitations, including faded fingerprints, occupational wear, disabilities or dermatological conditions. • U Mobile recommends extending Self-Registration to Non-Malaysian users, noting that restricting foreigners to Assisted Registration may result in accessibility gaps during non-business hours, weekends and public holidays, increased congestion at physical service points, and reduced user convenience compared to regional practices. • While U Mobile supports the integration of MyDigital ID for Self-Registration, they emphasise that the technical requirements under the Mandatory Standards must remain aligned with the existing MyDigital ID implementation framework to avoid conflicting system obligations or inconsistent technical specifications. • U Mobile further requests that the Commission allow fallback identity verification methods to ensure service continuity in circumstances where MyDigital ID is unavailable or inaccessible, including periods of platform downtime or situations where customers cannot access MyDigital ID. • U Mobile also highlights that transitioning from current practices to the strengthened mandatory framework will require substantial financial investment and accordingly requests the Commission’s consideration for financial support to facilitate nationwide implementation across Service Providers and Dealer networks.
XOX	<ul style="list-style-type: none"> • XOX agrees with the proposed approach for Assisted Registration and supports the use of MyDigital ID with facial recognition as the biometric authentication method for Malaysian citizens, Permanent Residents and Temporary Residents.

Submitting Party	Comments
	<ul style="list-style-type: none"> XOX notes that introducing fingerprint authentication in addition to MyDigital ID would result in duplication, as MyDigital ID verification is already linked to the National Registration Department (“NRD”) database, which contains fingerprint information and provides the necessary assurance for identity authentication.
YTLC	<ul style="list-style-type: none"> YTLC generally supports the Commission’s proposed methods for Assisted Registration and Self-Registration, including the use of secure automated platforms, biometric authentication and MyDigital ID, noting that these measures enhance the integrity and accuracy of the Registration process. YTLC proposes that the Commission allow additional Assisted Registration options to accommodate operational realities and improve customer experience, particularly for customers who may be unfamiliar with digital platforms or face challenges using the prescribed verification methods. YTLC recommends that Service Providers’ retail outlets and authorised Dealers be permitted to assist customers using MyKad scanning (front and back) with e-verification through MyDigital ID, as an alternative Assisted Registration option. This method, in YTLC’s view, maintains secure authentication requirements while supporting assisted onboarding. YTLC further proposes that facial recognition using MyKad scanning through the Service Providers’ mobile application (e-KYC process) be accepted as an alternative verification method. YTLC highlights that this option reduces operational complexity, avoids the substantial cost of deploying biometric fingerprint devices to all Dealers, and offers flexibility for users who may not have, or be able to use, MyDigital ID. YTLC seeks clarification on the legal basis for mandating integration with MyDigital ID, given that the platform is not established under statute. YTLC also requests that the Commission define the scope of responsibility, liability and

Submitting Party	Comments
	<p>compliance obligations associated with MyDigital ID to avoid operational ambiguity.</p>
SP#10	<ul style="list-style-type: none"> SP#10 seeks clarification on the proposed requirements.
GSMA	<ul style="list-style-type: none"> GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> Ezzam Mohlarom does not support the proposal to mandate the use of MyDigital ID for SIM Card Registration. He is of the view that verification using the MyKad is sufficient and that the mandatory implementation of MyDigital ID may create additional complexity for users. Ezzam Mohlarom proposes that the Commission review the requirement for MyDigital ID for prepaid SIM Registration and reconsider its necessity in light of the existing MyKad-based verification process. JL Wong expresses full support for the Commission’s proposal requiring the exclusive use of MyDigital ID for identity verification under Self-Registration. JL Wong proposes that, for Assisted Registration, Dealers staff should also be required to verify their own MyDigital ID concurrently during the Registration process. This measure is intended to strengthen accountability and enable Individual level traceability in cases involving identity misuse or improper handling of Registration activities. JL Wong further recommends that MyDigital ID be made accessible to all Malaysian residents, including citizens, Permanent Residents, and holders of various entry or employment passes, to support inclusivity and streamline the Registration process. Mohammad Firas Faiq expresses strong support for the implementation of MyDigital ID verification under the proposed Registration framework, noting that this

Submitting Party	Comments
	measure will strengthen safeguards against fraud.

Table 7: Responses to the proposed method of Registration for Assisted Registration and Self-Registration, including the use of secure automated platforms, biometric authentication, and MyDigital ID

Summary of Feedback

- 2.4.1 The Commission acknowledges that five (5) out of fifteen (15) respondents, namely CelcomDigi, TM Tech, XOX, JL Wong and Mohammad Firas Faiq, expressly agreed with the proposed methods of Registration for Assisted Registration and Self-Registration. Maxis generally supported the proposed requirements but objected to the mandatory use of MyDigital ID, while Ezzam Mohlarom expressly disagreed with the mandatory use of MyDigital ID. Four (4) respondents, including redONE, Tune Talk, U Mobile and YTLC took note of the proposed requirements without expressing direct agreement or objection. Meanwhile, SP#10 sought clarifications on the proposed requirements. Redtone has no comment for the proposed requirement. The remaining two (2) respondents, GSMA and Heng Tun Kiat, did not submit any feedback for this question.
- 2.4.2 Respondents who agreed with the proposed methods generally support the strengthened verification framework, including the use of secure automated platforms, biometric authentication and MyDigital ID. Several respondents consider these measures important to enhance identity assurance, reduce fraud risks and strengthen the overall integrity of prepaid SIM Card Registration processes.
- 2.4.3 These respondents, however, highlighted operational considerations relating to system readiness, device deployment, user limitations in completing biometric authentication, and the need for adequate implementation timelines. Respondents also emphasised the importance of maintaining secure Self-Registration options for Non-Malaysian users to support accessibility and service continuity.
- 2.4.4 Respondents who disagreed with the mandatory use of MyDigital ID, indicated that MyKad based verification remains sufficient and expressing concern that the proposed approach may introduce unnecessary complexity for certain users.

- 2.4.5 Some respondents proposed refinements to improve operational feasibility, including the use of MFA enabled alternatives such as eKYC with liveness detection or OCR combined with facial recognition, allowing fallback verification processes when MyDigital ID is unavailable, and clarifying the Identification Document that may be accepted for Non-Malaysian End-user.

Commission's View

Assisted Registration

- 2.4.6 The Commission notes requests for clarification on fingerprint biometric configurations for Assisted Registration involving MyKad, MyKAS and MyPR holders. The Mandatory Standards do not prescribe specific fingerprint biometric formats or device configurations; the requirement is limited to biometric authentication verified using devices compliant with NRD specifications (MyKad/eID interface) or devices listed by NRD for such purposes, consistent with the National Registration (Amendment) Bill 2025, expanding biometric mechanisms (10-fingerprints, iris, facial).
- 2.4.7 Biometric authentication conducted via NRD recognised or approved readers provides a higher level of identity assurance. The specific biometric fingerprint used is not material, provided verification is successfully performed against official records. Where fingerprint verification is not feasible due to physical or medical reasons, Document-on-Chip Content Information certified by NRD may be used.
- 2.4.8 Accordingly, the Commission maintains that Assisted Registration must be conducted using secure verification mechanisms aligned with NRD-issued identity documents.
- 2.4.9 The Commission affirms that verification using a passport reader together with biometric authentication represents the appropriate and internationally recognised method for verifying passport authenticity and End-user identity for Non-Malaysian Registrations. This approach is consistent with international travel document standards prescribed by the International Civil Aviation Organisation ("ICAO") and aligns with existing immigration screening and border control practices.
- 2.4.10 In this regard, the Commission is of the view that verification for Non-Malaysian End-users should be carried out using a passport reader with biometric authentication. The Commission considers that this approach

provides a consistent and reliable level of assurance for prepaid SIM Card Registration.

Self-Registration

- 2.4.11 The Commission notes concerns relating to the current adoption rate of MyDigital ID and potential accessibility challenges for End-users who have yet to enrol. Assisted Registration channels remain available to ensure continued access to Prepaid Services during the transition period.
- 2.4.12 The Commission clarifies that the requirement for MyDigital ID is implemented pursuant to the Government direction to strengthen secure SIM Card Registration. Given the absence of physical oversight, Self-Registration presents higher risks, and MyDigital ID provides stronger identity assurance and traceability than standalone facial recognition mechanisms.
- 2.4.13 The Commission recognises that certain End-users may require assistance due to digital literacy or accessibility constraints. Service Providers and Dealers may facilitate Self-Registration at physical outlets or designated kiosks by providing navigational or procedural assistance only, without altering the applicable verification requirements.
- 2.4.14 The Commission maintains that the capture of Identification Document images remains a necessary supporting control for auditability, investigation and enforcement. MyDigital ID serves as the verification mechanism, while document capture supports evidentiary completeness.
- 2.4.15 With respect to Non-Malaysian End-users, the Commission does not permit Self-Registration at this stage, having regard to enforcement experience indicating higher risks of impersonation and document misuse involving foreign Identification Document.
- 2.4.16 Accordingly, Registration of Non-Malaysian End-users shall be carried out through Assisted Registration supported by passport readers with biometric authentication and physical document sighting, where applicable.
- 2.4.17 To support the National Digital ID initiatives, which provide enhanced security and robust identity verification and to deliver an improved

customer experience, the Commission is to **revise paragraph 7.1.2** as follows:

"7.1.2 **Self-Registration:** *Identification Document scanning with e-verification through MyDigital ID, performed exclusively on the Service Provider's official authorised platform.*"

Implementation Period

- 2.4.18 The Commission acknowledges feedback on procurement, system integration and training requirements associated with the proposed Registration mechanisms.
- 2.4.19 The Commission notes that the Mandatory Standards address longstanding vulnerabilities in prepaid SIM Card Registration and should be implemented in a timely manner, while allowing a proportionate transition based on operational readiness.
- 2.4.20 Accordingly, the Commission is to provide a transition period of six (6) months from the date of issuance of Mandatory Standards to allow Service Providers and Dealers to complete the necessary preparatory measures prior to full enforcement.

Treatment of Invalid Documentation and Registration

- 2.4.21 The Commission affirms that where verification identifies invalid information or non-compliant documentation in relation to prepaid Registration, the Registration shall be treated as unsuccessful and Prepaid Services shall not be activated.
- 2.4.22 Service Providers and Dealers remain required to carry out verification and retain relevant Registration records in accordance with the Mandatory Standards and applicable laws for compliance, audit and enforcement purposes.

Alignment of Identification Document

- 2.4.23 NRD issued documents, including MyKad, MyKAS and MyPR documents shall be verified using NRD recognised MyKad readers with fingerprint authentication. Passport shall be verified using passport readers, coupled with biometric authentication; IMM13 document and other Identification Documents shall be verified in alignment with Mandatory Standards.

- 2.4.24 Under the Immigration Act 1959/63, lawful presence/identity verification relies on passports/visas/passes; UNHCR cards are not travel/identity documents recognised for entry/stay under Malaysian law. Hence, UNHCR-related documents are not accepted under the Mandatory Standards at this time.
- 2.4.25 The Commission notes the Government’s decision to introduce the *Dokumen Pendaftaran Pelarian* (“DPP”) as an official mechanism for the Registration, identification and management of refugees under a government led framework, including the use of biometric systems and enhanced traceability controls. The Commission acknowledges that the DPP, once formally issued and operationalised, may address key regulatory concerns.
- 2.4.26 Notwithstanding the above, any future acceptance of the DPP for prepaid SIM Card Registration will be subject to further consideration by the Commission and will be communicated from time to time.

QUESTION 6: THE COMMISSION SEEKS VIEWS ON THE PROPOSED REQUIREMENTS FOR THE REGISTRATION OF INDIVIDUAL, INCLUDING THE TYPE OF INFORMATION TO BE OBTAINED AND RECORDED, AND THE USE OF IDENTIFICATION DOCUMENTS FOR AUTHENTICATION AND THE PROVISION FOR THE COMMISSION TO APPROVE OTHER FORMS OF IDENTIFICATION DOCUMENTS FROM TIME TO TIME.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi disagrees with the requirement to obtain and record mailing address information for Malaysian citizens, Permanent Residents, Temporary Residents, and Non-Malaysian users, as they consider this requirement unnecessary for Prepaid Services. • CelcomDigi refers to section 6, subsection 3(c) of the PDPA 2010, which states that personal data may only be processed if it is necessary for or directly related to the purpose of processing, and if the data collected is adequate and not excessive for that purpose. • CelcomDigi is of the view that mailing address information is excessive and irrelevant for Prepaid

Submitting Party	Comments
	<p>Services, as address information already exists within MyKad for Malaysians and Work Permits for Non-Malaysians.</p> <ul style="list-style-type: none"> • CelcomDigi highlights that mailing addresses are typically collected for the purpose of sending physical bills, which does not apply to Prepaid Services. Communications with prepaid users are ordinarily conducted through calls, text messages and digital channels. CelcomDigi also notes that future digital service applications may further reduce the need for physical address information.
Maxis	<ul style="list-style-type: none"> • Maxis seeks clarification on the requirement to collect mailing address information for Individual Registration. Maxis notes that Prepaid Services do not require hardcopy billing and therefore considers the collection of mailing address information unnecessary. Maxis proposes that the Commission remove this requirement from the proposed Mandatory Standards. • Maxis states that it will continue to record the permanent address as reflected in the customer’s Identification Document during Registration. However, Maxis highlights that customers are ultimately responsible for providing a valid and current address, as Service Providers and Dealer have no practical means to verify the accuracy or timeliness of this information at the point of Registration. Maxis proposes that this be reflected in the implementation guidelines to ensure clear delineation of roles and expectations between customers and Service Providers. • Maxis further proposes that the Commission revise the requirement relating to additional information to provide greater clarity and predictability. Maxis recommends replacing the phrase “Any other information as may be required by the Commission that will be notified to the Service Providers from time to time” in sections 7.2(a)(vi), 7.2(b)(vii) and 7.2(c)(vi) of the proposed Mandatory Standards with the phrase “Any other techniques deemed reasonable by the Commission,

Submitting Party	Comments
	subject to industry consultation.”
redONE	<ul style="list-style-type: none"> • redONE notes that, for Registrations involving MyKad, the Service Providers will integrate their processes with MyDigital ID and will therefore not store MyKad data or related documents. • redONE further states that, for other categories of Registrations, it will continue to store customer information and supporting documents in accordance with existing operational practices.
Redtone	<ul style="list-style-type: none"> • Redtone indicates that they have no comments on the proposed requirements for the Registration of an Individual.
TM Tech	<ul style="list-style-type: none"> • TM Tech supports the Commission’s objective to ensure that prepaid SIM Registration is anchored on accurate, authenticated and traceable identity information. TM Tech notes that the strengthened verification framework under the proposed Mandatory Standards, which includes MFA, biometric authentication, MyDigital ID integration and secured automated platforms, already provides a strong basis for identity assurance. • TM Tech is of the view that the types of information required for Individual Registration should be limited to identity-based, authoritative and verifiable information. TM Tech states that additional information or documents that cannot be reliably verified by Service Providers, or that do not materially enhance identity assurance, should be streamlined to maintain operational feasibility and user accessibility. • TM Tech observes that the proposed Mandatory Standards introduce significantly more document and information requirements compared to the Guidelines on Registration of End-Users of Prepaid Public Cellular Services (MCMC/G/01/17) (“Guidelines 2017”). TM Tech notes that many of these additional items do not improve

Submitting Party	Comments
	<p>security under the strengthened verification framework.</p> <ul style="list-style-type: none"> • TM Tech highlights several operational concerns, including: <ul style="list-style-type: none"> i. Frequent mismatches between MyKad address and actual place of residence for Malaysians due to delays in updating NRD records, relocation for work or studies and tenancy changes; ii. Temporary or fluid residential arrangements for Non-Malaysians, such as shared employer accommodation, student hostels or short-term rentals, which make address-matching difficult; and iii. Additional documents such as visa papers, employer or university addresses, proof of temporary stay and mailing addresses, which do not contribute to identity assurance and instead increase data-capture steps, storage obligations and the risk of errors. • TM Tech proposes that the Commission remove non-essential and unverifiable information requirements, including: <ul style="list-style-type: none"> i. Mailing addresses that differ from the Identification Document; ii. Expiry dates of passports or MyKAS/IMM13; iii. Employer, university, hostel or accommodation addresses and any form of address-matching; and iv. Hotel or temporary stay information for tourists. • TM Tech maintains that the Mandatory Standards should require only information that can be directly and reliably verified at the point of Registration. TM Tech states that obligations to obtain or validate temporary, unverifiable or non-authoritative information fall outside the practical capabilities of Service Providers and do not strengthen the integrity of the Registration ecosystem.

Submitting Party	Comments
Tune Talk	<ul style="list-style-type: none"> • Tune Talk takes note of the proposed requirements for the Registration of Individual.
U Mobile	<ul style="list-style-type: none"> • U Mobile proposes that the requirement for Service Providers to verify Work Permit Identification Documents, student identification cards and visa documents be removed. U Mobile notes that these documents are issued, maintained and verified by the IDM, and that telecommunications frontline staff are not equipped with the specialised knowledge required to authenticate these documents. • U Mobile notes that verification is challenging due to the absence of reference materials, updates on document formats and changes to security features. U Mobile highlights variations in Work Permit Identification Documents, multiple formats of student identification cards, design updates for IMM13 documents, and differing formats and requirements for visas and visa exemptions. • U Mobile proposes the removal of information requirements that are already recorded and verified by the IDM. These include company name and address for Non-Malaysian workers, university name and address for Non-Malaysian students, and hotel or temporary residential address for Non-Malaysian tourists. • U Mobile notes that obtaining temporary residential addresses from tourists is operationally difficult, as many tourists stay with informal hosts, may not have confirmed accommodation at the time of purchase or may move between multiple locations during their stay. • U Mobile recommends that the Commission utilise existing government databases and systems, including IDM records, for verification purposes, instead of requiring Service Providers to authenticate documents or information that fall outside their operational capacity.

Submitting Party	Comments
XOX	<ul style="list-style-type: none"> • XOX does not object to verifying the information submitted by the customer against the Identification Document provided. • XOX notes that certain fields, such as passport expiry, are not currently captured in its system and would require system development and associated business costs. • XOX notes that information on tourist addresses is dependent on the accuracy of the information provided by the tourist and may not be applicable for day tourists.
YTLC	<ul style="list-style-type: none"> • YTLC explicitly supports the proposed requirement and recommends to include Legal Guardianship documents under paragraph 7.2.
SP#10	<ul style="list-style-type: none"> • SP#10 notes and seeks clarification on the proposed requirements.
GSMA	<ul style="list-style-type: none"> • GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> • The respondents do not provide any feedback for this question.

Table 8: Responses to the proposed requirements for the Registration of Individual, including the type of information to be obtained and recorded, and the use of Identification Documents for authentication and the provision for the Commission to approve other forms of Identification Documents from time to time

Summary of Feedback

2.4.27 The Commission acknowledges that two (2) out of fifteen (15) respondents, namely XOX and YTLC, agreed with the proposed requirements for the Registration of an Individual. TM Tech supported the overarching objective of ensuring that Registration captures accurate, authenticated and traceable identity information. However,

similar to CelcomDigi, Maxis and U Mobile, TM Tech disagreed with the proposed requirement to capture non-essential information such as the mailing address. Three (3) respondents including redONE, Tune Talk, and SP#10 took note of the proposal without expressing direct agreement or objection, with some of them sought clarification. Redtone has no comment for the proposed requirement. The remaining five (5) respondents, including GSMA and four (4) public respondents did not submit any feedback for this question.

- 2.4.28 Respondents who agreed with the proposed requirements consider them appropriate to ensure accurate, authenticated and traceable identity information for prepaid SIM Card Registration. These respondents view the proposed approach as supportive of strengthened verification processes and consistent with the objectives of improving identity integrity within the Registration ecosystem.
- 2.4.29 Respondents who disagreed raised concerns regarding the necessity and practicality of certain information requirements, particularly mailing addresses, temporary or fluid accommodation details, and additional data fields that cannot be reliably verified at the point of Registration. They highlighted that several proposed information items do not enhance identity assurance, fall outside the operational capability of Service Providers, and may duplicate information already validated by relevant authorities.
- 2.4.30 Respondents requested clarification on the specific information to be obtained and stored, including permanent and mailing addresses, supporting documents for Non-Malaysian, and whether Service Providers are required to store images of Identification Documents. Respondents also sought clarity regarding the types of Identification Documents that may be approved by the Commission from time to time, and recommended that only authoritative, verifiable information be mandated under the Mandatory Standards.

Commission's View

Scope of Address Verification Responsibilities

- 2.4.31 The Commission emphasises the need for accurate, authenticated and traceable identity information to strengthen consumer protection and prevent fraudulent prepaid Registrations. While Prepaid Services do not require billing, the capture of a current address is necessary to support traceability, enforcement and investigation, without imposing

impractical verification obligations.

- 2.4.32 The Commission determines that Service Providers or the Dealers are required to capture the current address instead of the mailing address during the Registration. Accordingly, the Commission is to **revise** the requirement for a 'Mailing Address' to 'Current Address'.
- 2.4.33 The Commission agrees with the view that the End-users must share their updated current address. Hence, the Service Providers or the Dealers shall provide means for the End-users to update their current address on the Service Providers' official authorised platform as and when necessary.
- 2.4.34 The Commission is of the view that the requirement to record a hotel or temporary address for tourists at the point of prepaid SIM Card Registration is necessary to enhance traceability and support enforcement and investigative purposes. While tourists may not have a permanent address in Malaysia, recording of a temporary place of stay or visit provides an additional verifiable data point to mitigate risks of misuse, including fraud and scams.
- 2.4.35 In this regard, the verification process of permanent address shall be verified against the information contained in the original Identification Document in accordance with paragraph 7.7 of the Mandatory Standards. For hotel or temporary residential address, the Service Providers or the Dealers are required to verify the information in accordance with paragraph 7.8 of the Mandatory Standards.

Issues related to Identification Document Validity and Verification

- 2.4.36 The Commission does not agree to remove the requirement to record document validity information, including expiry dates of passports, MyKAS, MyPR or IMM13 documents, as the use of expired documents undermines identity assurance.
- 2.4.37 For Non-Malaysian End-users, verification shall be conducted strictly in accordance with the prescribed process, including the use of passport readers with biometric authentication and physical sighting of original documents in alignment with the Mandatory Standards. This ensures verification is anchored to authoritative systems maintained by the relevant authorities.

- 2.4.38 Additionally, the Commission is of the view that the Registration of End-users who submit invalid Identification Documents during Registration is not permitted. Accordingly, **new paragraph 7.5 is included** to enhance clarity:

"7.5 The Service Provider or Dealer shall not register any End-user who submitted any invalid Identification Document during Registration."

Suggestion for Industry Consultation Prior to Any Requirement

- 2.4.39 As the statutory regulator, the Commission must retain flexibility to respond promptly to emerging risks, enforcement needs and changes in the threat landscape and cannot be made contingent upon consultation processes. In this regard, the Commission stands guided by the provisions of laws under the CMA 1998.

Record Keeping Obligation

- 2.4.40 The Commission notes the request for clarification on whether Service Providers or Dealers are required to capture and retain identification information, including image copies of Identification Document, for authentication purposes.
- 2.4.41 The Commission clarifies that, for Registration purposes, the Service Providers or the Dealers are required to obtain, record, and retain complete Registration records, including image copies of Identification Document and relevant supporting documents, in accordance with the Mandatory Standards.
- 2.4.42 The retention of document images is required regardless of whether Registration is conducted via Assisted Registration or Self-Registration, to support auditability, post-Registration verification, investigation, and enforcement actions.

Documents of Legal Guardianship

- 2.4.43 The Commission supports the use of Legal Guardianship documents to strengthen verification for minors. However, as the Mandatory Standards regulate End-user Registration, such documentation will not be expressly prescribed, and Service Providers or the Dealers may incorporate this proposal as part of their internal controls.

Issues regarding Absence of Addresses in Permit / Entry Documents

- 2.4.44 The Commission notes the feedback regarding the requirement to obtain and record company or educational institution details for Non-Malaysian End-users, including cases where certain immigration passes do not display employer or institution address information.
- 2.4.45 The Commission clarifies that paragraph 7.2(b)(v) applies only to Non-Malaysian End-users holding a valid working permit or student pass that establishes an ongoing employment or educational relationship in Malaysia, as recognised by the IDM.
- 2.4.46 For Non-Malaysian End-users holding any other immigration pass that does not establish an employment or educational relationship, including where no employer or institutional address is stated on the pass, Registration shall be carried out in accordance with the tourist Registration requirements, subject to the three (3) months validity period. This approach ensures consistent treatment across immigration categories, avoids misclassification, and preserves traceability and enforcement effectiveness under the Mandatory Standards.

QUESTION 7: THE COMMISSION SEEKS VIEWS ON THE PROPOSED REQUIREMENTS FOR THE REGISTRATION OF BUSINESS ENTITY.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi agrees with the proposed requirements for the Registration of Business Entity.
Maxis	<ul style="list-style-type: none"> • Maxis takes note of the requirement and highlights that certain appointed Dealers who manage corporate and enterprise customers should be permitted to conduct prepaid Registrations for Business Entity.
redONE	<ul style="list-style-type: none"> • redONE takes note of the proposed requirement for the Registration of Business Entity.

Submitting Party	Comments
Redtone	<ul style="list-style-type: none"> Redtone has no comment on the requirement for the Registration of Business Entity.
TM Tech	<ul style="list-style-type: none"> TM Tech agrees with the proposed business Registration requirements and already complies with them. TM Tech’s current process verifies all necessary business details and documents. The requirements add transparency without adding extra burden. TM Tech only suggests keeping the clause flexible for future digital verification methods like SSM eBiz or MyDigital ID.
Tune Talk	<ul style="list-style-type: none"> Tune Talk takes note of the proposed requirement for the Registration of Business Entity.
U Mobile	<ul style="list-style-type: none"> U Mobile seeks clarification on the term “duly recorded” and proposes that Service Providers be allowed to record verified business information without retaining supporting documents, as the official records are already kept by government agencies and this approach would reduce unnecessary data storage requirements.
XOX	<ul style="list-style-type: none"> XOX does not object to the requirement.
YTLC	<ul style="list-style-type: none"> YTLC supports the proposed requirement, as it is aligned with existing industry and operational practice.
SP#10	<ul style="list-style-type: none"> SP#10 seeks clarification on the proposed requirements.
GSMA	<ul style="list-style-type: none"> GSMA does not provide any feedback for this question.

Submitting Party	Comments
Public	<ul style="list-style-type: none"> The respondents do not provide any feedback for this question.

Table 9: Responses to the proposed requirements for the Registration of Business Entity

Summary of Feedback

- 2.4.47 The Commission acknowledges that four (4) out of fifteen (15) respondents, namely CelcomDigi, TM Tech, XOX, and YTLC, agreed with the requirements for the Registration of Business Entities. TM Tech noted that its current processes already comply and suggested flexibility for future digital verification methods.
- 2.4.48 Three (3) respondents, Maxis, redONE, and Tune Talk took note of the proposed requirements without expressing direct agreement or objection, with Maxis further proposed allowing appointed Dealers handling corporate customers to conduct Business Entity Registrations and SP#10 sought clarification. One (1) respondent, U Mobile, requested further clarification regarding this requirement, particularly on the term “duly recorded” and suggested that verified business information could be recorded without retaining supporting documents.
- 2.4.49 The remaining five (5) respondents, including GSMA and members of the public, did not submit feedback for this question.
- 2.4.50 Respondents who agreed or took note of the proposed requirements generally considered them clear, practical, and aligned with current industry practice. Several noted that the requirements would enhance transparency, support operational implementation, and allow flexibility for future verification methods, while clarifications aim to ensure practicality across different business scenarios.

Commission’s View

- 2.4.51 The Commission notes feedback on the Registration of Business Entities and acknowledges that certain Dealers may be appointed to support corporate or enterprise customers. However, the Commission reiterates that Registration of Prepaid Services for Business Entity

involves heightened verification and accountability and shall therefore be carried out by the Service Providers only, as provided under the Mandatory Standards.

- 2.4.52 The Commission clarifies that “duly recorded” refers to information that is properly documented and retained in accordance with the prescribed record keeping requirements, supported by corresponding documentary evidence.
- 2.4.53 The retention of original or certified copies of supporting documents, in physical or electronic form, remains necessary to ensure auditability, traceability and enforcement, notwithstanding the existence of authoritative records held by other entities. This is important, as the Registration process for the provision of Prepaid Services to Business Entity is undertaken by the Service Providers and falls within their operational control and regulatory responsibility.
- 2.4.54 With respect to authorised representatives, the Commission confirms that a Non-Malaysian may be appointed, provided the Individual is properly verified, duly authorised by the Business Entity, and all required information and supporting documents are recorded and retained as an End-user in accordance with the Mandatory Standards.
- 2.4.55 The Commission is of the view that these clarifications are consistent with industry practice and are necessary to ensure practicality, transparency and compliance in the Registration of Business Entity.

QUESTION 8: THE COMMISSION SEEKS VIEWS ON THE PROPOSED REQUIREMENT OF THE PERSONAL DATA PROTECTION ACT (“PDPA”) 2010 IN RELATION TO REGISTRATION OF PREPAID SERVICES.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> CelcomDigi agrees with the proposed requirements of the PDPA 2010 in relation to Registration of Prepaid Services.
Maxis	<ul style="list-style-type: none"> Maxis disagrees with the proposed requirement and prefers to retain the current PDPA aligned opt-out approach for direct marketing.

Submitting Party	Comments
redONE	<ul style="list-style-type: none"> redONE acknowledges the proposed requirement related to the PDPA 2010 for Prepaid Services Registration.
Redtone	<ul style="list-style-type: none"> Redtone has no comment on the proposed requirement.
TM Tech	<ul style="list-style-type: none"> TM Tech agrees with the proposed requirement. They state that it is consistent with PDPA 2010 and matches their current internal data protection practices. TM Tech confirms that their existing processes already follow the PDPA 2010 principles and that they obtain consent properly for any additional use of customer data.
Tune Talk	<ul style="list-style-type: none"> Tune Talk takes note of the proposed requirement related to the PDPA 2010.
U Mobile	<ul style="list-style-type: none"> U Mobile does not object to the requirement.
XOX	<ul style="list-style-type: none"> XOX does not object to the requirement.
YTLC	<ul style="list-style-type: none"> YTLC agrees with the Commission's proposal.
SP#10	<ul style="list-style-type: none"> SP#10 agrees with the proposed requirement
GSMA	<ul style="list-style-type: none"> GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> The respondents do not provide any feedback for this question.

Table 10: Responses to the proposed requirement of the Personal Data Protection Act 2010 in relation to Registration of Prepaid Services

Summary of Feedback

- 2.4.56 The Commission acknowledges that eight (8) respondents, namely CelcomDigi, TM Tech, YTLC, redONE, Tune Talk, U Mobile, XOX and SP#10 agreed or have no objection with the proposed requirement.
- 2.4.57 Maxis did not support the proposal, preferring to retain the current PDPA-aligned opt-out approach for direct marketing, while Redtone has no comments on the proposed requirement.
- 2.4.58 The remaining five (5) respondents, including GSMA and members of the public did not submit any feedback for this question.
- 2.4.59 Respondents who agreed or took note of the proposed requirement generally considered it consistent with existing data protection practices and aligned with the PDPA 2010. Several respondents highlighted that the proposed requirement supports proper consent management and enhances the protection of personal data in the Registration of Prepaid Services.

Commission's View

- 2.4.60 The Commission notes that most respondents agreed with or do not object to the proposed PDPA 2010 requirement and therefore retains paragraph 7.14, which restricts the use of personal information to prepaid Registration purposes unless explicit End-user consent is obtained.
- 2.4.61 While one (1) respondent preferred an opt-out approach for direct marketing, the Commission considers an opt-in requirement necessary to ensure stronger data protection, which also aligned with current regulatory instruments.
- 2.4.62 Accordingly, the Commission is of the view that, where the process is implemented in compliance with the PDPA 2010, it would comply with the requirements under the Mandatory Standards.
- 2.4.63 The Commission is to **retain** the proposed requirement, as it enhances consumer protection and promotes responsible handling of personal data within the prepaid Registration ecosystem.

2.5 Limitation of SIM Cards

QUESTION 9: THE COMMISSION SEEKS VIEWS ON THE PROPOSED REQUIREMENT FOR LIMITATION OF SIM CARDS FOR MALAYSIAN CITIZENS/PERMANENT RESIDENTS/TEMPORARY RESIDENTS.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi is of the view that the Commission should reconsider the SIM limitation requirement in the Proposed Mandatory Standards. • CelcomDigi states that with a stricter Registration process being introduced, imposing limits on the number of SIM Cards per Individual is unnecessary. • CelcomDigi states that Service Providers should retain flexibility to balance investment priorities such as CAPEX for scanners, readers, and system integration while also maintaining their customer base. • As an alternative, CelcomDigi proposes a staggered approach to reducing SIM Card limits per Individual, allowing periodic reassessment of whether further reductions are needed once automated Registration mechanisms address invalid Registration issues. • CelcomDigi understands that the Commission’s major concern relates to invalid Registrations eventually used by scammers but believes that tightened Registration methods will alleviate these issues. • CelcomDigi therefore opines that limiting the number of SIM Cards per Individual is no longer necessary or relevant under the strengthened Registration framework.
Maxis	<ul style="list-style-type: none"> • Maxis is of the view that introducing more stringent SIM Card limits for Malaysians may be overly restrictive and could negatively affect customer experience, freedom of choice, and even personal safety. • Maxis highlights that strict SIM Card limits could create

Submitting Party	Comments
	<p>challenges for customers wishing to port in from other operators if they currently hold more than the permitted number of lines, potentially creating unnecessary friction and reducing ease of switching.</p> <ul style="list-style-type: none"> • Maxis notes that SIM Card limits may have broader implications for market competitiveness and long-term industry growth and encourages the Commission to consider these impacts. • Maxis recommends maintaining the current SIM Card limit, particularly in light of the strengthened biometric and identity-verification measures being introduced, which Maxis believes will meaningfully address fraudulent or False Registration. • Maxis states that many users legitimately require multiple SIM Cards for various devices such as tablets, smartwatches, mobile hotspots, routers, or secondary phone numbers. A strict SIM Card limit would hinder such multi-device usage. • Maxis is of the view that efforts to combat fraudulent or False Registration should prioritise strong Registration controls, secure verification processes, and supporting infrastructure rather than strict numerical limits on SIM ownership. • Maxis proposes that no SIM limit be imposed per subscriber. However, if a reduction is deemed necessary, Maxis suggests revising the current threshold from five (5) to three (3) SIM Cards per subscriber per Service Provider as a more balanced approach. • Maxis provides examples of international practices, noting that: <ul style="list-style-type: none"> ○ Some jurisdictions mandate identity verification for prepaid SIMs but do not impose SIM-ownership limits; ○ Others rely on network-level controls (e.g., traffic monitoring, sender-ID controls) rather than SIM

Submitting Party	Comments
	<p>caps;</p> <ul style="list-style-type: none"> ○ Some markets apply moderate SIM caps at the operator level, supported by robust onboarding and Dealer accountability. • Maxis also notes that in other regulated industries (e.g., banking), strong KYC processes are used without imposing numerical limits on the number of accounts a customer may hold, demonstrating that verification controls can be effective without strict caps.
redONE	<ul style="list-style-type: none"> • redONE agrees with the proposal to limit Individuals to two (2) SIM Cards per Service Provider, stating that such a limit is appropriate to prevent misuse and over-subscription.
Redtone	<ul style="list-style-type: none"> • Redtone indicates that they have no comments on the proposed limitations of SIM Cards.
TM Tech	<ul style="list-style-type: none"> • TM Tech considers the reduction of SIM Card limit to two (2) a major policy shift that does not reflect current consumer usage and may restrict legitimate multi-device needs. • TM Tech believes the strengthened verification requirements under the proposed Mandatory Standards already achieve the fraud prevention objective, making a lower SIM cap unnecessary. • TM Tech views the transitional requirement as creating a two-tier customer environment that may lead to confusion and inconsistent user experience. • TM Tech highlights that allowing the Commission to vary SIM Card limits at any time introduces operational unpredictability and requests clearer parameters. • TM Tech proposes retaining the current limit of five (5) SIMs per Individual per Service Provider as it aligns better with consumer behaviour and avoids unnecessary

Submitting Party	Comments
	access limitations.
Tune Talk	<ul style="list-style-type: none"> • Tune Talk takes note of this proposed requirement.
U Mobile	<ul style="list-style-type: none"> • U Mobile strongly recommends maintaining the current limit of five (5) SIM Cards per Individual per Service Provider, especially in light of the more stringent Registration requirements introduced under this Mandatory Standard. • U Mobile states that reducing the limit to two (2) SIM Cards would significantly impact subscription numbers and hinder Malaysia’s digitalisation efforts. • U Mobile highlights that Individuals legitimately require multiple SIM Cards for various devices and use cases, including smart watches, connected vehicles, home security systems, IoT devices, tablets, mobile hotspots, routers, and separation of work and personal lines. • U Mobile adds that parents also require additional SIM Cards for children under twelve (12) years old who are not permitted to register services independently.
XOX	<ul style="list-style-type: none"> • XOX does not agree with the proposed limitation. Propose to maintain the limit of five (5) SIM Cards per Individual.
YTLC	<ul style="list-style-type: none"> • YTLC proposes that the current limit of five (5) SIM Cards per Individual be maintained for Malaysian citizens, Permanent Residents, and Temporary Residents. • YTLC states that mandatory e-verification via MyDigital ID will enable identity verification directly with the NRD, thereby significantly reducing or eliminating risks of fraudulent or duplicate Registrations. • YTLC asserts that fraud mitigation objectives are already achieved through secure biometric or authentication requirements such as MyKad readers, MyDigital ID, and

Submitting Party	Comments
	<p>Multi-Factor Authentication, making numerical SIM limits less necessary.</p> <ul style="list-style-type: none"> • YTLC highlights operational and consumer practicality, noting that many users legitimately require more than two (2) SIM Cards for various purposes, including personal use, work lines, IoT devices, tablets, home broadband, and secondary numbers. Maintaining a five (5) SIM cap provides flexibility while retaining safeguards.
SP#10	<ul style="list-style-type: none"> • SP#10 agrees with the proposal requirement.
GSMA	<ul style="list-style-type: none"> • GSMA acknowledges the policy intent behind limiting the number of SIM Cards, particularly to reduce misuse and strengthen accountability. • GSMA is of the view that any SIM limit should be applied per Individual rather than per Service Provider, ensuring a holistic cap that cannot be circumvented by switching operators. • GSMA believes an Individual based limit would preserve consumer choice while still meeting regulatory objectives. • GSMA notes that applying the limit per operator may impose unnecessary constraints on market competition, innovation, and business opportunities for Service Provider. • GSMA considers that an Individual level approach would achieve the regulatory intent without distorting the broader digital ecosystem.
Public	<ul style="list-style-type: none"> • Ezzam Mohlarom disagrees with the proposal to limit Malaysian users to two (2) SIM Cards per telco, stating that such a restriction could reduce revenue opportunities for telcos even though SIM misuse by syndicates and scammers is acknowledged.

Submitting Party	Comments
	<ul style="list-style-type: none"> • Ezzam Mohlarom proposes increasing the proposed limit from two (2) SIM Cards to three (3) SIM Cards per telco for Malaysian users as a more reasonable approach. • Ezzam Mohlarom also suggests imposing limits on postpaid SIM usage to prevent unpaid bills and blacklisting issues. <hr/> <ul style="list-style-type: none"> • Heng Tun Kiat strongly disagrees with the proposal to reduce the prepaid SIM limit from five (5) to two (2) per person per telco, noting that the current five (5) SIM rule has been in place for many years and many users rely on multiple SIMs for family needs, businesses, promotions, and network backup. • Heng Tun Kiat believes limiting SIM quantity does not address the real cause of scam related misuse, arguing that the true issue is unauthorised Registration by Dealer who fail to properly verify MyKad during onboarding. • Heng Tun Kiat states that those who lawfully register SIMs will not misuse them, since their identities are already recorded, while scammers depend on improperly registered SIMs. • Heng Tun Kiat emphasises that most countries do not impose a two (2) SIM cap, citing examples like Hong Kong and Thailand (up to ten (10) SIMs allowed), and the Philippines and Indonesia (no limit), arguing that Malaysia’s existing five (5) SIM rule is already comparatively strict. • Heng Tun Kiat rejects the argument that a person could own up to 60 SIMs across all telcos, stating that consumers naturally subscribe only to a few preferred telcos based on plans and coverage. • Heng Tun Kiat highlights that the proposed rule would inconvenience existing users with more than two (2) SIMs, as they would need to surrender several active numbers before they can register new ones in the future.

Submitting Party	Comments
	<ul style="list-style-type: none"> • Heng Tun Kiat concludes that the root problem is weak Registration verification, not the number of SIMs, and urges MCMC to ensure strict MyKad verification compliance rather than tightening SIM caps.
	<ul style="list-style-type: none"> • JL Wong considers it illogical for normal users to hold more than 20 prepaid SIM Cards given Malaysia’s many operators, suggesting that such high quantities are typically associated with spammers or scammers. • He notes that since postpaid SIMs are also available, a person could theoretically accumulate many numbers, which he views as excessive. • He proposes setting a maximum of five (5) prepaid SIM Cards in total across all providers for each Individual, rather than per-operator limits. • He recommends that Service Providers offer a simple, official channel that allows users to voluntarily terminate their SIM Cards instantly, without requiring long grace periods.
	<ul style="list-style-type: none"> • Mohammad Firas Faiq expresses strong support for imposing limits on SIM Card ownership as a measure to curb fraud.

Table 11: Responses to the proposed requirement for limitation of SIM Cards for Malaysian citizens/Permanent Residents/Temporary Residents

Summary of Feedback

- 2.5.1 The Commission notes that three (3) out of fifteen (15) respondents, redONE, SP#10 and Mohammad Firas Faiq agreed with the proposed limitation of two (2) SIM Cards per Individual per Service Provider, viewing it as an appropriate measure to curb misuse and strengthen accountability.
- 2.5.2 Ten (10) respondents, CelcomDigi, Maxis, TM Tech, U Mobile, XOX, YTL, GSMA, Ezzam Mohlarom, Heng Tun Kiat and JL Wong, disagreed

with the proposal. While acknowledging the Commission's policy intent, most of the respondents considered the two (2) SIM Cards limit unnecessary or disproportionate given the strengthened Registration and verification measures under the Mandatory Standards. JL Wong, however, proposed that the SIM Card limitation should be reduced further to five (5) SIM Cards across Service Providers.

2.5.3 Respondents opposing the proposal generally attributed fraud and misuse to weaknesses in Registration and verification processes rather than the number of SIM Cards. Several highlighted that enhanced controls such as biometric verification, MyKad readers, MyDigital ID and MFA are more effective than numerical caps.

2.5.4 Operational and consumer impact concerns were also raised, with respondents noting legitimate needs for multiple SIM Cards (e.g. multi device use, work personal separation, family usage, broadband and redundancy), as well as potential effects on customer experience, portability and market dynamics. GSMA further suggested that any numerical limit, if retained, should apply per Individual across all Service Providers.

2.5.5 Six (6) respondents proposed retaining the existing five (5) SIM Cards limit per Service Provider, adopting a higher or intermediate threshold, or reviewing the need for a cap after assessing the effectiveness of enhanced verification measures.

2.5.6 One (1) respondent (Tune Talk) took note of the proposed requirement without expressing direct agreement or objection. Redtone has no comment for the proposed requirement.

Commission's View

2.5.7 The Commission notes that Malaysia has multiple Service Providers that offer Prepaid Services. The proposed reduction to a two (2) SIM Cards limit has the potential to adversely affect customer experience, constrain number portability processes, and limit market dynamics and service choices available to subscribers across different networks.

2.5.8 The Commission further notes respondents' feedback that the two (2) SIM Cards limit may be unduly restrictive for users with multi device ownership, work personal separation and service redundancy. Having considered this feedback, the Commission is of the view that retaining the existing SIM Card limitation as per the Guidelines 2017 for

Malaysian citizens/ Permanent Residents/ Temporary Residents Individuals, rather than the lower threshold proposed in the Public Inquiry, would better balance misuse mitigation objectives with consumer needs.

2.5.9 With strengthened Registration and identity verification measures, implemented through biometric authentication and MyDigital ID, the Mandatory Standards aim to ensure Registration integrity. These enhancements establish a more robust framework, reducing vulnerabilities in the Registration process and supporting a more reliable identification verification outcome.

2.5.10 Accordingly, the Commission is to revise the proposed limit to not more than five (5) prepaid SIM Cards per Malaysian citizens/ Permanent Residents/ Temporary Residents Individual, per Service Provider.

2.5.11 The Commission is to **revise paragraph 8.1(a)** as follows:

"8.1 *In respect of the SIM Card, the Registration shall be subject to the following limitations:*

(a) **Malaysian citizens/ Permanent Residents/ Temporary Residents:**

The Service Provider shall not register more than five (5) SIM Cards per Individual per Service Provider."

QUESTION 10: THE COMMISSION SEEKS VIEWS ON THE PROPOSED REQUIREMENT FOR THE LIMITATION OF SIM CARDS FOR NON-MALAYSIAN.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi disagrees with limiting SIM Cards for Non-Malaysian at an industry-wide level across all Service Providers. • CelcomDigi states that implementing an industry wide SIM limit would require a shared database or common handling mechanism, resulting in unnecessary additional development and maintenance costs for Service

Submitting Party	Comments
	<p>Providers.</p> <ul style="list-style-type: none"> • CelcomDigi adds that such an arrangement may also raise concerns regarding the sharing of customers' personal data.
Maxis	<ul style="list-style-type: none"> • Maxis does not support the proposal to limit Non-Malaysian Individuals to two (2) SIM Cards across all Service Providers, stating that while it shares the Commission's objective of improving prepaid Registration integrity, the restriction is overly stringent and may unintentionally limit connectivity, user choice, and safety for legitimate foreign users. • Maxis highlights that a strict two (2) SIM Card limit would prevent foreign users from maintaining SIM Cards from multiple Service Providers concurrently, which is often necessary to address coverage differences or optimise product features (e.g., international calling rates, data bundles). • Maxis notes that the proposed restriction would also prevent foreign users from signing up for multiple SIMs across different devices, affecting those who rely on multiple phones, tablets, IoT devices, or mobile hotspots. • Maxis states that enforcing an industry-wide SIM Card limit would require establishing a mechanism to cross-check passport Registrations across all operators in real time, necessitating a robust and fully integrated cross-industry platform that would be costly, complex, and operationally sensitive. • Maxis raises concerns that such a shared verification system must operate with very high reliability, as any system failure, latency, or outage could incorrectly indicate that a user holds more than two (2) SIM Cards. • Maxis highlights that centralised sharing of foreigners' personal data (e.g., names, passport numbers) introduces additional data security and reputational risks, and any breach involving such a system could

Submitting Party	Comments
	<p>undermine trust in Malaysia’s digital ecosystem.</p> <ul style="list-style-type: none"> • Maxis believes that the focus for preventing false or inappropriate Registration should be on strengthening and enforcing Registration processes and supporting infrastructure, rather than imposing strict SIM Card limitation for Non-Malaysian.
redONE	<ul style="list-style-type: none"> • redONE agrees with capping Non-Malaysian users to two (2) SIM Cards across all Service Providers, including MVNOs, stating that this aligns with national security considerations and fraud prevention efforts.
Redtone	<ul style="list-style-type: none"> • Redtone indicates that they have no comments on the proposed SIM Card limitations for Non-Malaysian, as the company only accepts Registrations from Malaysian citizens.
TM Tech	<ul style="list-style-type: none"> • TM Tech maintains that strong identity verification measures, such as biometrics, MFA-secured platforms, and passport based verification, are a more effective safeguard against misuse than imposing restrictive SIM Card caps on Non-Malaysian users. • TM Tech considers a balanced and operationally practical approach more appropriate for supporting the Commission’s objectives while meeting legitimate connectivity needs. • TM Tech proposes retaining the existing five (5) SIM limit per Non-Malaysian per Service Providers, noting that it aligns with current industry systems, avoids unnecessary disruption, and supports legitimate multi-device use. • TM Tech recommends avoiding any cross-operator SIM limit because there is no regulatory, technical, or PDPA-compliant mechanism for Service Providers to validate SIM ownership across operators. • TM Tech believes that maintaining the current five (5)

Submitting Party	Comments
	<p>SIM limit and focusing on strong verification measures provides a practical, proportionate, and sustainable regulatory model.</p>
Tune Talk	<ul style="list-style-type: none"> • Tune Talk states that for Non-Malaysian users, it supports maintaining a limit of two (2) SIM Cards across all Service Providers. • Tune Talk proposes establishing a centralised industry registry or shared verification system to enable Service Providers to verify and monitor the total number of SIM Cards registered under each Non-Malaysian Individual, to ensure effective implementation of the SIM Card limit.
U Mobile	<ul style="list-style-type: none"> • U Mobile recommends that the SIM Card limit for Non-Malaysian be applied on a per-Service Provider basis rather than as an industry-wide aggregate limit. • U Mobile highlights that enforcing an industry-wide SIM limit would require real-time inter-operator data-sharing infrastructure, which does not currently exist and would necessitate significant system development, investment, and regulatory framework establishment. • U Mobile notes that tracking SIM limits across multiple Service Providers could introduce risks such as system conflicts, glitches, and potential service disruptions. • U Mobile recommends maintaining the current limit of five (5) SIM Cards per Individual per Service Provider, stating that reducing this limit would unnecessarily restrict expatriates, foreign students, tourists, and business travellers who have legitimate needs for multiple SIM Cards. • U Mobile states that lowering the limit would provide no additional security advantage, given the more stringent Registration processes already required under the new Mandatory Standard.

Submitting Party	Comments
XOX	<ul style="list-style-type: none"> XOX recommends retaining the current five (5) SIM limit.
YTLC	<ul style="list-style-type: none"> YTLC understands the Commission’s objective to prevent misuse but foresees challenges in implementing the proposed two (2) SIM limit for Non-Malaysian, as Service Providers do not have visibility into the total number of SIMs registered across different operators. YTLC states that enforcing this requirement would raise confidentiality concerns due to the need for End-user information to be shared between Service Providers. YTLC respectfully requests that the Commission consider these operational and confidentiality constraints when finalising the Mandatory Standards.
SP#10	<ul style="list-style-type: none"> SP#10 seeks clarification on the proposed requirements.
GSMA	<ul style="list-style-type: none"> GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> JL Wong believes it is unreasonable for normal users to hold more than 20 prepaid SIM Cards, given Malaysia has over 10 operators, and notes that such high quantities are typically associated with scammers or spammers. He points out that postpaid SIMs are also available, meaning Individuals could theoretically accumulate many numbers, which he views as excessive. He proposes introducing a maximum of five (5) prepaid SIM Cards per Individual across all providers, rather than applying limits per operator. He recommends that Service Providers provide a simple and official channel for users to instantly terminate their SIM Cards without long waiting or grace periods. <hr/> <ul style="list-style-type: none"> Mohammad Firas Faiq strongly supports the initiative to

Submitting Party	Comments
	impose limits on SIM Card ownership as a measure to curb fraud.

Table 12: Responses to the proposed requirement for the limitation of SIM Cards for Non-Malaysian

Summary of Feedback

- 2.5.12 The Commission notes that three (3) out of fifteen (15) respondents (redONE, Tune Talk and Mohammad Firas Faiq) agreed with the proposed requirement limiting Non-Malaysian Individuals to two (2) SIM Cards across all Service Providers, viewing an industry-wide cap as necessary to curb misuse, support fraud prevention and enhance national security.
- 2.5.13 Seven (7) respondents (CelcomDigi, Maxis, TM Tech, U Mobile, XOX, YTL and JL Wong) disagreed with the proposed aggregate limit, raising operational, technical, data protection concerns and proposed alternative approaches. Meanwhile, SP#10 sought clarifications on the proposed requirements.
- 2.5.14 They also highlighted that enforcement of an industry-wide cap would require real-time cross-operator visibility or a centralised verification platform, which does not currently exist and would involve significant system development, integration costs and operational complexity.
- 2.5.15 Concerns were also raised regarding PDPA 2010 compliance, cybersecurity and confidentiality risks arising from the sharing of Non-Malaysian identity and passport information across Service Providers.
- 2.5.16 Several respondents further noted that Non-Malaysian Individuals may have legitimate needs for multiple SIM Cards across different Service Providers, including for work, study, travel, multi-device use and coverage optimisation, and cautioned against undue restriction of lawful usage.
- 2.5.17 These respondents also emphasised that strengthened Registration and verification measures already provide robust safeguards against misuse and considered such controls more effective than the number of SIM Card limits. Thus, this group of respondents proposed to maintain the current SIM Card limits of five (5) per Service Provider.

- 2.5.18 Redtone did not express a position on the proposed limitation and provided no substantive views, as they do not register Non-Malaysian. GSMA, Ezzam Mohlarom and Heng Tun Kiat did not submit any feedback to this proposed requirement.

Commission's View

- 2.5.19 The Commission notes that while a minority of respondents supported an industry-wide limitation of two (2) prepaid SIM Cards for Non-Malaysian Individuals, a larger proportion raised concerns relating to operational feasibility and data protection. Notwithstanding these concerns, respondents generally aligned with the Commission's objective of strengthening the integrity of prepaid Registration and preventing misuse of Prepaid Services.
- 2.5.20 Based on the Commission's enforcement experience, the misuse of prepaid services has often been linked to scams and fraudulent activities, with a substantial proportion of such cases involving Non-Malaysian identity and passport information. While the strengthened Registration and identity verification measures under the Mandatory Standards will enhance the integrity of Prepaid Registration, allowing a higher number of SIM Cards per individual may increase the risk of criminal activities involving prepaid services.
- 2.5.21 The Commission recognises that enforcing an aggregate SIM Card limit across Service Providers would require cross-operator visibility or centralised systems, which are not currently available. Implementing such mechanisms could also raise legal and personal data protection concerns.
- 2.5.22 Having regard to the feedback, the Commission considers that a per Individual per Service Provider SIM Cards limit, applied as part of Prepaid Registration controls, is an immediately enforceable and proportionate approach that avoids inter-operator data sharing.
- 2.5.23 Accordingly, the Commission is to **revise paragraph 8.1(b)** as follows:

"8.1 *In respect of the SIM Card, the Registration shall be subject to the following limitations:*

(b) **Non-Malaysian:**

Service Provider shall not register more than two (2) SIM Cards per Individual per Service Provider."

2.6 What Constitutes Effective Registration

QUESTION 11: THE COMMISSION SEEKS VIEWS ON THE PROPOSED REQUIREMENTS FOR AN EFFECTIVE REGISTRATION.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi takes note of the proposed requirements for an Effective Registration.
Maxis	<ul style="list-style-type: none"> • Maxis takes note of the proposed requirements for an Effective Registration.
redONE	<ul style="list-style-type: none"> • redONE seeks clarification on the proposed requirement.
Redtone	<ul style="list-style-type: none"> • Redtone indicates that they have no comments on the proposed requirements for an Effective Registration.
TM Tech	<ul style="list-style-type: none"> • TM Tech agrees and does not object to the proposed requirement for Effective Registration. They support that prepaid Registration and activation should only happen after customer information is fully verified and recorded and confirm that Pre-activated SIM Card must remain prohibited. TM Tech and other providers already practice this process. • TM Tech also recommends keeping the requirement flexible to support future digital verification methods such as MyDigital ID.
Tune Talk	<ul style="list-style-type: none"> • Tune Talk takes note of the proposed requirements for an Effective Registration.
U Mobile	<ul style="list-style-type: none"> • U Mobile does not object to the requirement.
XOX	<ul style="list-style-type: none"> • XOX does not object to the requirement.

Submitting Party	Comments
YTLC	<ul style="list-style-type: none"> • YTLC supports the proposed requirements for effective Registration.
SP#10	<ul style="list-style-type: none"> • SP#10 acknowledges the proposed requirement.
GSMA	<ul style="list-style-type: none"> • GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> • The respondents do not provide any feedback for this question.

Table 13: Responses to proposed requirements for an effective Registration

Summary of Feedback

- 2.6.1 The Commission acknowledges that four (4) respondents, namely TM Tech, U Mobile, XOX and YTLC, agreed with the proposed requirements for effective Registration.
- 2.6.2 Four (4) respondents, namely CelcomDigi, Maxis, Tune Talk and SP#10, took note of the proposed requirement without expressing direct agreement or objection. Redtone has no comment on the proposed requirement. Whilst, redONE sought further clarification on certain components of this proposed requirement.
- 2.6.3 The remaining five (5) respondents, including GSMA and members of the public did not submit any feedback for this question.
- 2.6.4 Respondents who agreed or took note of the proposed requirement for an Effective Registration acknowledged that Registration is considered complete only after the required End-user information has been properly captured, verified and recorded in the Prepaid Services End-user System in real-time. Registration takes effect immediately upon successful recording, after which the End-user may access Prepaid Services. No SIM Card may be activated or used before Registration is fully completed, and Pre-activated SIM Card are strictly prohibited.

Commission's View

- 2.6.5 The Commission notes that most respondents agreed with or did not object to the proposed requirements for Effective Registration. Feedback primarily sought clarification on acceptable verification technologies, including OCR and facial recognition, and raised concerns about the cost implications of fingerprint enabled ID readers for the Dealers.
- 2.6.6 The Commission clarifies that, Registration is effective only upon the completion of Registration, including capturing, verifying and real-time recording of Identification Document and required End-user information in the Prepaid Services End-user System. Prepaid Services shall not be activated prior to completion of Registration, and Pre-activated SIM Card shall remain prohibited.
- 2.6.7 The Commission will continue to monitor implementation and may issue further guidance to ensure the requirements remain effective and aligned with national security and data protection objectives.

2.7 Notification of Successful Registration

QUESTION 12: THE COMMISSION SEEKS VIEWS ON THE PROPOSED REQUIREMENTS OF NOTIFICATION OF SUCCESSFUL REGISTRATION.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi takes note of the proposed requirements for the notification of successful Registration
Maxis	<ul style="list-style-type: none"> • Maxis takes note of the proposed requirements for the notification of successful Registration.
redONE	<ul style="list-style-type: none"> • redONE takes note of the proposed requirements relating to the notification of successful Registration.
Redtone	<ul style="list-style-type: none"> • Redtone indicates that they have no comments on the

Submitting Party	Comments
	<p>proposed requirements for the notification of successful Registration.</p>
<p>TM Tech</p>	<ul style="list-style-type: none"> • TM Tech agrees with the proposed requirement for notifying End-users of successful Registration within twelve (12) hours. TM Tech notes that its existing systems already issue real-time notifications upon completion of Registration, which is well within the proposed timeframe. TM Tech considers the updated requirement under paragraphs 10.1 and 10.2 to be an enhancement of customer transparency and an improvement from the previous 24-hour notification window under the Guidelines 2017. • TM Tech also highlights that End-users may verify their Registration status through its customer service channels, consistent with paragraph 10.2. TM Tech supports maintaining the proposed notification requirement as it aligns with operational capabilities and reinforces consumer experience and service accountability.
<p>Tune Talk</p>	<ul style="list-style-type: none"> • Tune Talk takes note of the proposed requirements for notification of successful Registration and does not raise any further comments on the matter.
<p>U Mobile</p>	<ul style="list-style-type: none"> • U Mobile does not object to the proposed requirements for notification of successful Registration.
<p>XOX</p>	<ul style="list-style-type: none"> • XOX takes notes of the proposed requirement to notify End-users within twelve (12) hours but highlights that the shortened timeframe may create operational constraints, particularly during peak business periods. XOX does not object to maintaining a customer care line for End-user enquiries.
<p>YTLC</p>	<ul style="list-style-type: none"> • YTLC supports the proposed requirement for notifying End-users of successful Registration within the prescribed

Submitting Party	Comments
	timeframe.
SP#10	<ul style="list-style-type: none"> • SP#10 agrees and seeks clarification on the proposed requirements.
GSMA	<ul style="list-style-type: none"> • GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> • The respondents do not provide any feedback for this question.

Table 14: Responses to the proposed requirement of notification of successful Registration

Summary of Feedback

- 2.7.1 The Commission acknowledges that four (4) out of fifteen (15) respondents, namely TM Tech, U Mobile, YTLC and SP#10, agreed with the proposed requirements on the notification of successful Registration. TM Tech considered that the updated requirements under paragraphs 10.1 and 10.2 are an enhancement of customer transparency and an improvement from the previous 24-hour notification.
- 2.7.2 Five (5) respondents, including CelcomDigi, Maxis, redONE, Tune Talk and XOX, took note of the proposed requirement without expressing direct agreement or objection. XOX, however, raised operational concerns regarding the 12-hour notification timeframe, noting potential constraints during peak operational hours. Redtone has no comment for the proposed requirement.
- 2.7.3 The remaining five (5) respondents, including GSMA and members of the public did not submit any feedback for this question.

Commission's View

- 2.7.4 The Commission notes the feedback received on the operational aspects of notifying End-users of Registration status and observes that the majority of respondents did not object to the proposed requirements.

- 2.7.5 The Commission notes broad support for the requirement to notify End-users of successful Registration within twelve (12) hours and to provide a customer care line for Registration status enquiries. Several respondents indicated that this is already supported by existing systems and processes.
- 2.7.6 The Commission considers that the proposed twelve (12)-hour timeframe, which refines the existing framework under the Guidelines 2017, is reasonable, operationally achievable and proportionate, notwithstanding isolated concerns relating to peak-period constraints.
- 2.7.7 The Commission notes that Service Providers have multiple channels such as live chat, call centre, email, SMS to enquire on the status of Registration. Accordingly, the Commission is to **retain** paragraph 10.1 and **revise paragraph 10.2** as follows:

"10.2 The Service Provider shall provide a customer support channel for End-user for enquiry on the status of their Registration."

2.8 Service Validity for Non-Malaysian (Tourists)

QUESTION 13: THE COMMISSION SEEKS VIEWS ON THE PROPOSED REQUIREMENT OF SERVICE VALIDITY FOR NON-MALAYSIAN (TOURISTS).

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi disagrees with the proposed requirement on service validity for Non-Malaysian tourists. • CelcomDigi is of the view that imposing a three (3) months validity period will constrain competition and limit the ability of Service Providers to offer differentiated products and services to customers. • CelcomDigi proposes revised wording for paragraph 11 of the Mandatory Standards to clarify that Non-Malaysian tourists may use Prepaid Services for a maximum period of three (3) months from the completion of Registration. • CelcomDigi also proposes that Service Providers should ensure automatic Termination of Prepaid Services for Non-

Submitting Party	Comments
	<p>Malaysian tourists upon expiry of the three (3) months validity period.</p>
<p>Maxis</p>	<ul style="list-style-type: none"> • Maxis supports the intent of the proposed clause, recognising its purpose to mitigate risks associated with prolonged or untraceable service usage by tourists. • Maxis highlights that although tourists typically stay in Malaysia for up to 90 days, some visitors may remain longer under valid social visit visas or multiple-entry arrangements. • Maxis proposes that the clause include flexibility to accommodate extended tourist stays, provided such extensions are supported by valid documentation. • Maxis recommends revising paragraph 11.1 to permit Non-Malaysian tourists to use Prepaid Services for the duration of their lawful stay in Malaysia, with specific rules differentiating between visa free tourists and those holding valid social visit passes. • Maxis proposes that Prepaid Services for visa free tourists be terminated three (3) months after Registration. • Maxis proposes that tourists holding valid social visit passes also be subject to a three (3) months Termination period, but with an option to request a service extension aligned to the lawful stay period, subject to approval and advance written notice. • Maxis recommends amending paragraph 11.2 so that Prepaid Services for Non-Malaysian tourists are terminated according to the revised conditions under paragraph 11.1, and clarifies that Termination must occur even if the tourist remains in Malaysia beyond the permitted period.
<p>redONE</p>	<ul style="list-style-type: none"> • redONE agrees with the proposed requirements of service validity for Non-Malaysian tourists.

Submitting Party	Comments
Redtone	<ul style="list-style-type: none"> • Redtone indicates that they have no comments on the proposed requirements of service validity for Non-Malaysian tourists, as the company only accepts Registrations from Malaysian citizens.
TM Tech	<ul style="list-style-type: none"> • TM Tech agrees with the proposed requirement to limit Prepaid Services validity for Non-Malaysian tourists to three months, noting that it is consistent with the Guidelines 2017 and aligns with the typical tourist visa duration. • TM Tech supports the measure as it matches the usual length of stay for tourists, strengthens data integrity and traceability through passport based verification, and ensures inactive tourist lines do not remain in use beyond their permitted period. • TM Tech notes that the requirement simplifies compliance monitoring for both Service Providers and the Commission, as automated system controls can terminate tourist lines after three months regardless of remaining credit. • TM Tech indicates that its existing prepaid system already performs this function automatically, making the requirement operationally practical. • TM Tech does not object to the proposed clause and recommends it be retained, as it is aligned with current industry practices and complements passport based verification requirements.
Tune Talk	<ul style="list-style-type: none"> • Tune Talk takes note of this proposed requirement.
U Mobile	<ul style="list-style-type: none"> • U Mobile does not object to the proposed requirement.
XOX	<ul style="list-style-type: none"> • XOX states that automatic Termination of service after three (3) months may inconvenience tourists who are in the process of converting their status from tourist to

Submitting Party	Comments
	<p>student or worker.</p> <ul style="list-style-type: none"> • XOX adds that tourists may not remember the three (3) months validity period, potentially leading to customer complaints.
YTLC	<ul style="list-style-type: none"> • YTLC agrees with the proposed requirement.
SP#10	<ul style="list-style-type: none"> • SP#10 seeks clarification on the proposed requirement.
GSMA	<ul style="list-style-type: none"> • GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> • JL Wong believes the three (3) months validity period for tourist SIMs is vulnerable to abuse, as departing tourists may resell their SIMs to scammers. • He suggests requiring tourists to submit their return flight ticket at the point of Registration, especially at airports, to prevent misuse. • He proposes that tourist SIM lines be automatically terminated one hour after the scheduled departure time of the tourist’s return flight. • He notes that if flights are delayed, tourists can rely on airport WiFi, making such immediate post-departure Termination feasible.

Table 15: Responses to the proposed requirements of service validity for Non-Malaysian (Tourists)

Summary of Feedback

2.8.1 The Commission notes that four (4) out of fifteen (15) respondents, namely TM Tech, redONE, U Mobile, and YTLC, agreed with the proposed requirement to limit the validity period of Prepaid Services registered under Non-Malaysian (tourist) status to three (3) months. These respondents generally considered the proposed validity period to be consistent with Malaysia’s prevailing tourist visa duration and existing

regulatory guidance, and support the objective of strengthening traceability, preventing prolonged or residual usage of tourist SIM Cards, and enabling effective compliance monitoring through automated Termination mechanisms.

- 2.8.2 The Commission further notes that two (2) respondents, namely CelcomDigi and Maxis, disagreed with the proposed requirement. CelcomDigi is of the view that a fixed three (3) months validity period may constrain competition and limit Service Providers' ability to offer differentiated prepaid products and services. Maxis, while supporting the underlying policy intent, proposed greater flexibility in implementation, including differentiated treatment based on visa categories and the ability to extend service validity in accordance with a tourist's lawful stay period, subject to supporting documentation and approval.
- 2.8.3 The Commission notes that three (3) respondents, namely, Tune Talk, XOX and SP#10, took note of the proposed requirement without expressing direct agreement or objection.
- 2.8.4 XOX and SP#10 sought clarification or highlighted operational considerations relating to the proposed requirement. XOX highlights potential inconvenience to tourists who are in the process of converting their status from tourist to student or worker, as well as the risk of customer complaints arising from unawareness of the validity period.
- 2.8.5 One (1) public respondent, JL Wong, recommended tightening controls on tourist SIMs by requiring return flight details at Registration and automatically terminating the SIM one (1) hour after the scheduled departure time to prevent misuse of the current three-month validity period.
- 2.8.6 Redtone has no comment for the proposed requirement as they only accept Registrations from Malaysian citizens.
- 2.8.7 The Commission notes that GSMA and three (3) other public respondents did not submit any feedback for this question.

Commission's View

- 2.8.8 The Commission notes general support for the proposed validity restriction for Non-Malaysian (tourist) prepaid Registrations. Feedback focused on requests for flexibility and clarification of operational

expectations, rather than opposition to the underlying policy intent.

- 2.8.9 Service Providers may offer differentiated packages. The proposed three (3) months service validity cap is intended to mitigate risks associated with prolonged use of prepaid SIM Cards by short-term visitors and is aligned with Malaysia's Short-Term Social Visit Pass practice. No tourist prepaid plan shall exceed this validity.
- 2.8.10 The Commission considers that automatic Termination after three (3) months or a shorter period, depending on the package offered, strengthens traceability, reduces exposure from dormant or transferred SIM Cards, and supports enforcement against misuse, including scams and impersonation activities linked to transient End-users.
- 2.8.11 The Commission notes that the extensions or alternative Termination triggers are operational matters. The Service Providers may align their process with existing industry capabilities and reflects the current prepaid Registration framework.
- 2.8.12 Accordingly, the Commission is to revise the proposed service validity period for clarity; three (3) months is the maximum term; packages may specify shorter validity. The Prepaid Service will be automatically terminated at the end of the three-month cap for Non-Malaysian (tourist) prepaid Registrations.
- 2.8.13 The Commission is to **revise paragraphs 11.1 and 11.2** as follows
- "11.1 Non-Malaysian (tourists), under subparagraph 7.2(c) of this Determination, shall be allowed to use the Prepaid Services for up to a maximum period of three (3) months only, effective from the completion of Registration.*
- 11.2 The Service Providers shall ensure that the Prepaid Services registered under the name of the Non-Malaysian (tourist) is automatically terminated upon the expiry of the applicable service validity period, and in any event not later than the expiry of the three (3) months maximum period."*

2.9 Record of Registration

QUESTION 14: THE COMMISSION SEEKS VIEWS ON THE PROPOSED REQUIREMENT FOR A RECORD OF REGISTRATION FOR ACTIVE END-USERS OF PREPAID SERVICES.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi is of the view that the retention of Registration information depends on each Service Provider's Registration mechanism. They propose revising paragraph 12.1 to allow records to be kept in physical, visual, or sound form, using "or" instead of "and" to provide flexibility in record-keeping.
Maxis	<ul style="list-style-type: none"> • Maxis proposes that the requirement for maintaining End-user Registration records be amended to allow records to be preserved in any of the listed forms, rather than requiring all forms simultaneously. They suggest replacing "and" with "or" in paragraph 12.1(b) to reflect this flexibility.
redONE	<ul style="list-style-type: none"> • redONE takes note of the requirement to maintain detailed Registration records for the entire service period strengthens auditing.
Redtone	<ul style="list-style-type: none"> • Redtone indicates that they have no comments on the proposed requirement for a record of Registration for active End-users of Prepaid Services.
TM Tech	<ul style="list-style-type: none"> • TM Tech agrees with retaining Registration records for as long as the service is active and for 18 months after Termination, consistent with existing guidelines. TM Tech proposes limiting retention to essential verification evidence and excluding visual and audio recordings, as these are not part of the required verification process and may introduce unnecessary PDPA 2010 risks, storage burdens, and operational ambiguities, while still ensuring

Submitting Party	Comments
	compliance and auditability.
Tune Talk	<ul style="list-style-type: none"> • Tune Talk takes note of the proposed requirement.
U Mobile	<ul style="list-style-type: none"> • U Mobile does not object to the requirement.
XOX	<ul style="list-style-type: none"> • XOX does not object to the requirement.
YTLC	<ul style="list-style-type: none"> • YTLC supports the proposed requirement as it aligns with current operational practices.
SP#10	<ul style="list-style-type: none"> • SP#10 acknowledges the proposed requirement.
GSMA	<ul style="list-style-type: none"> • GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> • The respondents do not provide any feedback for this question.

Table 16: Responses to the proposed requirements for a record of Registration for active End-users of Prepaid Services

Summary of Feedback

- 2.9.1 The Commission acknowledges that two (2) respondents, TM Tech and YTLC, expressly agreed with the retention period proposed under paragraphs 12.1 and 12.2, noting its consistency with existing guidelines and their operational practice. However, TM Tech suggested limiting the scope of retained records to essential verification evidence only, and excluding visual and audio recordings, citing potential PDPA 2010 risks, increased storage requirements, and operational ambiguities.
- 2.9.2 CelcomDigi and Maxis raised similar concerns regarding the flexibility of record keeping formats. Both respondents proposed that paragraph 12.1 be revised to allow Registration records to be retained in any of the listed forms, rather than requiring all forms concurrently, by replacing the word

“and” with “or” to provide greater operational flexibility.

- 2.9.3 Five (5) respondents, namely redONE, Tune Talk, U Mobile, XOX and SP#10, took note of the proposed requirement without expressing direct agreement or objection. Redtone has no comment on the proposed requirement.
- 2.9.4 The remaining five (5) respondents, including GSMA and members of the public did not submit any feedback for this question.

Commission’s View

- 2.9.5 The Commission confirms that Service Providers are required to retain End-user Registration records to support compliance, auditability and accountability throughout the lifecycle of Prepaid Services, including after Termination.
- 2.9.6 The Commission clarifies that records may be retained in physical or electronic form, as appropriate to the Registration method used. Records must be sufficient to demonstrate compliance, proportionate, and aligned with data protection obligations.
- 2.9.7 Accordingly, the Commission is to **revise paragraph 12.1(a)** for clarity and **retain** the requirements under paragraphs 12.1(b) and (c); **new paragraph 12.2 is included** to enhance clarity:

“12.1 The Service Provider shall keep, retain and preserve all records of the Registration of End-user including all information and updated information obtained by the Service Provider and/or the Dealer as long as the Prepaid Services to the End-user is still active, either in physical or electronic form which may include, but not be limited to:

(a) papers, documents, or printed materials; or

(b) any visual recording (live images and/or videos); and

(c) any sound recording, or any electronic, magnetic, mechanical or other form of sound recording howsoever made, or any sounds or electronic impulses (if any).

12.2 The Service Provider must cause to ensure that End-user is able to update the information.”

QUESTION 15: THE COMMISSION SEEKS VIEWS ON THE PROPOSED REQUIREMENTS FOR A RECORD OF REGISTRATION FOR TERMINATED END-USERS OF PREPAID SERVICES.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi agrees with the proposed requirement for a record of Registration of terminated End-users to be retained for eighteen (18) months from the date of Termination of Prepaid Services.
Maxis	<ul style="list-style-type: none"> • Maxis takes note of the proposed requirement for maintaining a record of Registration for terminated End-users for eighteen (18) months.
redONE	<ul style="list-style-type: none"> • redONE agrees with the proposed requirement for retaining the Registration record of terminated End-users for eighteen (18) months, noting that such retention supports investigative needs and facilitates regulatory compliance.
Redtone	<ul style="list-style-type: none"> • Redtone indicates that they have no comments on the proposed requirement for retaining the Registration record of terminated End-users.
TM Tech	<ul style="list-style-type: none"> • TM Tech agrees with the proposed requirement for Service Providers to retain the Registration record of terminated End-users for eighteen (18) months. TM Tech considers the requirement consistent with current practice under the Guidelines 2017 as well as the retention obligations under the PDPA 2010. TM Tech notes that the specified retention period supports lawful compliance, enables traceability for dispute resolution and regulatory enquiries, and aligns with its existing internal data management and deletion policies.
Tune Talk	<ul style="list-style-type: none"> • Tune Talk takes note of the proposed requirement for a

Submitting Party	Comments
	record of Registration for terminated End-users to be retained for eighteen (18) months.
U Mobile	<ul style="list-style-type: none"> U Mobile proposes a refinement to the wording of paragraph 12.2 to ensure alignment with the PDPA 2010. Specifically, U Mobile suggests clarifying that, upon Termination of Prepaid Services, the information collected for Registration shall be retained for a minimum period of eighteen (18) months from the date of Termination. This amendment is intended to ensure consistency with PDPA 2010 principles governing data retention and lawful processing.
XOX	<ul style="list-style-type: none"> XOX does not object to the proposed requirement for maintaining a record of Registration for terminated End-users for a period of eighteen (18) months.
YTLC	<ul style="list-style-type: none"> YTLC supports the proposed requirement for retaining Registration records of terminated End-users for eighteen (18) months, noting that the requirement is aligned with its existing operational practice.
SP#10	<ul style="list-style-type: none"> SP#10 acknowledges the proposed requirements.
GSMA	<ul style="list-style-type: none"> GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> The respondents do not provide any feedback for this question.

Table 17: Responses to the proposed requirements for a record of Registration for terminated End-users of Prepaid Services

Summary of Feedback

2.9.8 The Commission notes that five (5) out of fifteen (15) respondents, namely CelcomDigi, redONE, TM Tech, XOX and YTLC, agreed with the proposed requirement for Service Providers to retain the Registration

records of terminated End-users for a period of eighteen (18) months from the date of Termination of Prepaid Services. These respondents considered the requirement reasonable and appropriate to support traceability, regulatory oversight, audit requirements and investigative needs, and noted that it is broadly consistent with existing industry practice and data retention obligations.

- 2.9.9 U Mobile proposed a refinement to clarify that the eighteen (18) month retention period should be framed as a minimum requirement, in order to ensure alignment with the PDPA 2010.
- 2.9.10 Three (3) respondents, namely Maxis, Tune Talk and SP#10, took note of the proposed requirement without expressing direct agreement or objection. Redtone has no comment for the proposed requirement.
- 2.9.11 The remaining five (5) respondents, comprising GSMA and members of the public, did not submit any feedback for this question.

Commission's View

- 2.9.12 The Commission notes general acceptance of the proposed eighteen (18) months retention requirement, with no objection to retaining Registration records for terminated End-users.
- 2.9.13 The Commission clarifies that the eighteen (18) months period applies as a minimum duration from the date of Termination, which enhances legal certainty and aligns with PDPA 2010 principles without increasing the compliance burden. Electronic records must be maintained in a format admissible under the Evidence Act 1950 (sections 90A–90C) to support investigation, audit and enforcement.
- 2.9.14 The Commission reiterates that the requirement does not permit indefinite retention. Upon expiry of the prescribed period, personal data must be securely disposed of or anonymised unless retention is otherwise required by law, lawful investigation, or Commission Direction.
- 2.9.15 Accordingly, the Commission is to **retain** the proposed requirement under paragraph 12.3 as necessary, proportionate and consistent with the CMA 1998 and PDPA 2010.

2.10 Confidentiality and Security of Information

QUESTION 16: THE COMMISSION SEEKS VIEWS ON THE PROPOSED REQUIREMENTS OF CONFIDENTIALITY AND SECURITY OF END-USER'S INFORMATION.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi takes note of the proposed requirements relating to the confidentiality and security of End-user information.
Maxis	<ul style="list-style-type: none"> • Maxis takes note of the proposed requirements relating to the confidentiality and security of End-user information
redONE	<ul style="list-style-type: none"> • redONE agrees with the proposed requirements on confidentiality and security of End-user information. redONE emphasises that strict safeguards are essential to maintain user trust and highlights the importance of ensuring that MVNOs and Dealers implement comprehensive data protection measures in line with the prescribed obligations.
Redtone	<ul style="list-style-type: none"> • Redtone indicates that they have no comments on the proposed requirements relating to the confidentiality and security of End-user information.
TM Tech	<ul style="list-style-type: none"> • TM Tech agrees with the proposed requirements on the confidentiality and security of End-user information. TM Tech states that the requirements are aligned with the Guidelines 2017 and are consistent with its existing internal data protection and information security controls. TM Tech supports the strengthened emphasis on shared responsibility between Service Providers and Dealers, noting that this approach enhances accountability across the Registration chain. TM Tech also highlights that the proposed clauses complement its current verification, authorisation and data security practices.

Submitting Party	Comments
Tune Talk	<ul style="list-style-type: none"> • Tune Talk takes note of the proposed requirements relating to the confidentiality and security of End-user information.
U Mobile	<ul style="list-style-type: none"> • U Mobile proposes an amendment to paragraph 13.1 to align the requirement with the PDPA 2010. The respondent recommends expanding the clause beyond “unauthorised disclosure” to also cover loss, misuse, modification, accidental disclosure, alteration, or destruction of End-user information, ensuring a more comprehensive protection scope.
XOX	<ul style="list-style-type: none"> • XOX does not object to the proposed requirements relating to the confidentiality and security of End-user information.
YTLC	<ul style="list-style-type: none"> • YTLC agrees with the proposed requirements on the confidentiality and security of End-user information. YTLC notes that the requirements are largely aligned with the current Guidelines, with the key distinction that the proposed Mandatory Standards now explicitly extend confidentiality obligations to Dealers.
SP#10	<ul style="list-style-type: none"> • SP#10 acknowledges the proposed requirements.
GSMA	<ul style="list-style-type: none"> • GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> • The respondents do not provide any feedback for this question.

Table 18: Responses to the proposed requirements of confidentiality and security of End-user’s information

Summary of Feedback

2.10.1 The Commission notes that four (4) out of fifteen (15) respondents, namely redONE, TM Tech, XOX and YTLC, agreed with the proposed

requirements on the confidentiality and security of End-user information. These respondents support the obligations imposed on both Service Providers and Dealers to implement adequate safeguards to prevent unauthorised disclosure, misuse and compromise of End-user data, and consider the requirement consistent with existing regulatory frameworks and industry practices.

- 2.10.2 These respondents viewed the proposed requirements as aligned with the Guidelines 2017 and existing internal data protection controls. TM Tech and YTLC, in particular, highlighted that the explicit extension of confidentiality and security obligations to Dealers strengthens accountability across the Registration chain and enhances overall governance of End-user information. These respondents also noted that the proposed requirements complement current practices relating to secure system access, controlled data handling, contractual confidentiality obligations and ongoing compliance monitoring.
- 2.10.3 U Mobile proposed a refinement to paragraph 13.1 to ensure closer alignment with the PDPA 2010. U Mobile recommends broadening the scope of protection beyond unauthorised disclosure to cover loss, misuse, modification, accidental disclosure, alteration or destruction of End-user information.
- 2.10.4 Four (4) respondents, namely CelcomDigi, Maxis, Tune Talk and SP#10 took note of the proposed requirements without expressing direct agreement or objection. Redtone has no comment for the proposed requirement.
- 2.10.5 The remaining five (5) respondents, comprising GSMA and members of the public, did not submit any feedback on this question.

Commission's View

- 2.10.6 The Commission notes broad acceptance of the importance of confidentiality and security obligations within the prepaid Registration framework. Feedback focused primarily on alignment with PDPA 2010 principles and clarity on the scope of data protection responsibilities, particularly in relation to Dealers.
- 2.10.7 Several respondents expressly supported the proposed requirements, noting their consistency with existing industry practices and the Guidelines 2017, and recognising that extending these obligations to the Dealers strengthens accountability and mitigates risks of unauthorised access or

misuse of End-user information.

2.10.8 The Commission agrees that clarifying the scope of paragraph 13.1 to cover loss, misuse, modification, unauthorised or accidental access or disclosure, alteration or destruction of End-user information is consistent with PDPA 2010 and enhances regulatory clarity without imposing undue compliance burden.

2.10.9 Given the increased reliance on biometric data and digital identity systems, the Commission affirms that comprehensive confidentiality and security obligations applicable to both Service Providers and Dealers are necessary and proportionate.

2.10.10 Accordingly, the Commission is to **revise paragraph 13.1** as follows:

"13.1 The Service Provider and the Dealer shall ensure sufficient security measures are in place and shall ensure that the information of the End-user is kept and handled securely to prevent any loss, misuse, modification, unauthorised or accidental access or disclosure, alteration or destruction."

2.11 Suspension of Prepaid Services

QUESTION 17: THE COMMISSION SEEKS VIEWS ON THE PROPOSED REQUIREMENTS FOR SUSPENSION OF PREPAID SERVICES.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi is of the view that the maximum Suspension period should be thirty (30) days, with flexibility for Service Providers to impose a shorter Suspension period based on business needs, such as number recycling requirements. • CelcomDigi proposes revising paragraph 14.2 of the Mandatory Standards to allow a Suspension period of up to thirty (30) days instead of seventeen (17) working days, commencing after the three (3) days notice period. • CelcomDigi proposes revising paragraph 14.3 so that

Submitting Party	Comments
	<p>during the Suspension period, the suspended End-user should only be allowed to make calls to emergency services and to the Service Providers, rather than also being able to receive calls, SMS, and other communications.</p> <ul style="list-style-type: none"> • CelcomDigi notes that some Service Providers with fewer available numbers may need to enforce number recovery processes earlier under the Numbering and Electronic Addressing Plan (“NEAP”), hence requiring flexibility.
Maxis	<ul style="list-style-type: none"> • Maxis acknowledges the Commission’s proposed requirements for Suspension of Prepaid Services. • Maxis recommends that Suspension should apply only when the inaccurate or false information relates specifically to the customer’s name and NRIC, rather than for any type of inaccuracy in Registration details.
redONE	<ul style="list-style-type: none"> • redONE agrees with the Commission’s proposal and has no further comments or suggestions.
Redtone	<ul style="list-style-type: none"> • Redtone indicates that they have no comments on the proposed requirements for Suspension of Prepaid Services.
TM Tech	<ul style="list-style-type: none"> • TM Tech generally supports the Commission’s proposed requirements for Suspension of Prepaid Services, noting they are largely consistent with the Guidelines 2017 and improve clarity, customer communication, and operational transparency. • TM Tech considers the proposed grounds for Suspension appropriate, as they continue to protect verification integrity by suspending services when inaccurate or False Registration information is detected. • TM Tech takes note that while the notice period remains at three working days, the proposed extension of the

Submitting Party	Comments
	<p>Suspension duration from fourteen (14) to seventeen (17) working days gives users more time to update information but also keeps unverified records active longer in the network.</p> <ul style="list-style-type: none"> • TM Tech welcomes the clarification that suspended users may still receive calls or SMS and contact the Service Providers or emergency services, as this supports rectification and safety. • TM Tech proposes retaining the current fourteen (14) working days Suspension period, as extending it may prolong the presence of inaccurate or unverified identities in the network and reduce overall Registration integrity. • TM Tech believes the fourteen (14) days period is more proportionate because it shortens the exposure of unverified SIM records, preserves network integrity, and supports timely fraud mitigation. • TM Tech views the fourteen (14) days window as fair for genuine customers to update their details while preventing prolonged inaccuracies in the Registration database.
Tune Talk	<ul style="list-style-type: none"> • Tune Talk takes note of the proposed requirement.
U Mobile	<ul style="list-style-type: none"> • U Mobile does not object to the proposed requirement.
XOX	<ul style="list-style-type: none"> • XOX does not object to the proposed requirements.
YTLC	<ul style="list-style-type: none"> • YTLC supports the proposed requirement.
SP#10	<ul style="list-style-type: none"> • SP#10 acknowledges the proposed requirement.
GSMA	<ul style="list-style-type: none"> • GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> • The respondents do not provide any feedback for this

Submitting Party	Comments
	question.

Table 19: Responses to the proposed requirements for Suspension of Prepaid Services

Summary of Feedback

- 2.11.1 The Commission notes that four (4) respondents (redONE, YTLC, U Mobile and XOX) agreed with the proposed Suspension requirements, considering the framework appropriate. CelcomDigi, Maxis and TM Tech proposed refinements to improve clarity, proportionality and customer experience.
- 2.11.2 Key proposals relate to the duration of Suspension and the scope of permitted services. Suggestions included extending the Suspension period to thirty (30) days or retaining a shorter period, and limiting or allowing incoming calls and SMS during Suspension for safety and customer support purposes.
- 2.11.3 Two (2) respondents (Tune Talk and SP#10) took note of the proposed requirement without expressing direct agreement or objection. Redtone has no comment for the proposed requirement
- 2.11.4 The remaining five (5) respondents, comprising GSMA and members of the public, did not submit any feedback on this question.
- 2.11.5 Overall, the Commission observes that ten (10) out of fifteen (15) respondents supported or did not object to the principle of suspending services for inaccurate or False Registration information, with feedback focusing on implementation details rather than the underlying policy objective.

Commission's View

- 2.11.6 The Commission notes broad acceptance of the proposed Suspension framework under paragraphs 14.1 to 14.4, recognising Suspension as a necessary measure to address inaccurate or False Registration information and to prevent misuse of Prepaid Services.
- 2.11.7 While differing views were expressed on the appropriate Suspension Period, the Commission considers that prolonged retention of inaccurate or unverified records poses material fraud and enforcement risks. Having

balanced fraud mitigation, consumer fairness and operational practicality, the Commission affirms that a seventeen (17) working days Suspension Period provides a reasonable opportunity for rectification without unduly extending exposure to misuse.

- 2.11.8 Accordingly, the Commission does not agree to extend or shorten the Suspension Period and retains the duration under paragraph 14.2.
- 2.11.9 With respect to permitted services during Suspension, the Commission considers that allowing inbound calls and SMS, while restricting outbound communications except to emergency services and the Service Providers, is necessary.
- 2.11.10 The Commission does not agree to limit Suspension only to inaccuracies in selected identity fields, as the accuracy of all required Registration information is essential to traceability, enforcement and investigation. Suspension shall therefore apply where any required information is found to be inaccurate or false.
- 2.11.11 The Commission further affirms that the three (3) working days Notice Period prior to Suspension provides sufficient opportunity for End-users to take corrective action.
- 2.11.12 Accordingly, the Commission is to **retain** paragraphs 14.1 to 14.4 of the Mandatory Standards as proposed.

2.12 Termination of Prepaid Services

QUESTION 18: THE COMMISSION SEEKS VIEWS ON THE PROPOSED REQUIREMENTS FOR TERMINATION OF PREPAID SERVICES.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> CelcomDigi does not agree with the proposed requirement under paragraph 15.2, which mandates that Service Providers issue a notice to suspended End-users three days before the expiry of the Suspension period to inform them of the intended Termination. CelcomDigi proposes that paragraph 15.2 be deleted in its entirety. CelcomDigi

Submitting Party	Comments
	<p>is of the view that the Suspension period itself provides sufficient opportunity for genuine customers to contact the Service Providers and furnish updated or accurate information. CelcomDigi further states that an additional notice is unnecessary, as its system will automatically terminate the line upon expiry of the Suspension period.</p>
Maxis	<ul style="list-style-type: none"> • Maxis takes note of the proposed requirements for the Termination of Prepaid Services.
redONE	<ul style="list-style-type: none"> • redONE agrees with the proposed requirements for the Termination of Prepaid Services.
Redtone	<ul style="list-style-type: none"> • Redtone takes note of the proposed requirements for the Termination of Prepaid Services.
TM Tech	<ul style="list-style-type: none"> • TM Tech agrees with the proposed requirements for the Termination of Prepaid Services. TM Tech notes that the requirements are consistent with the existing Termination practices and are already supported by its current operational processes and system controls. TM Tech further highlights that its established notification and Suspension procedures align with the three (3) days notice requirement and that the proposed clause presents no operational or system impact. • TM Tech indicates that the proposed requirements provide sufficient procedural clarity, ensure timely removal of unverified or inaccurate Registrations, and allow the Service Providers to manage numbering resources effectively.
Tune Talk	<ul style="list-style-type: none"> • Tune Talk takes note of the proposed requirements for the Termination of Prepaid Services
U Mobile	<ul style="list-style-type: none"> • U Mobile does not object to the proposed requirements for the Termination of Prepaid Services

Submitting Party	Comments
XOX	<ul style="list-style-type: none"> XOX does not object to the proposed requirements for the Termination of Prepaid Services.
YTLC	<ul style="list-style-type: none"> YTLC supports the proposed requirements for the Termination of Prepaid Services.
SP#10	<ul style="list-style-type: none"> SP#10 acknowledges the proposed requirements.
GSMA	<ul style="list-style-type: none"> GSMA does not provide any comments for this question.
Public	<ul style="list-style-type: none"> The respondents do not provide any feedback for this question.

Table 20: Responses to the proposed requirements of Termination of Prepaid Services

Summary of Feedback

- 2.12.1 The Commission notes that five (5) out of fifteen (15) respondents, namely redONE, TM Tech, XOX, YTLC and U Mobile, agreed with the proposed requirements for the Termination of Prepaid Services. These respondents considered the proposed framework appropriate and operationally workable, and generally aligned with existing Suspension, notification and Termination practices.
- 2.12.2 TM Tech further noted that its existing operational processes already support the proposed Termination and notification timelines without additional system impact.
- 2.12.3 The Commission further notes that one (1) respondent, CelcomDigi, partially disagreed with the proposal. While CelcomDigi did not object to Termination following failure to rectify inaccurate Registration information, it disagrees specifically with the requirement under paragraph 15.2 to issue an additional three (3) days notice prior to Termination. CelcomDigi is of the view that the Suspension period itself provides sufficient opportunity for End-user to update their information and that an additional Termination notice is unnecessary given automated system Termination upon expiry of the Suspension period.

- 2.12.4 Four (4) respondents, namely Maxis, Redtone, Tune Talk and SP#10 took note of the proposed requirements without expressing direct agreement or objection.
- 2.12.5 The remaining five (5) respondents, comprising GSMA and members of the public, did not submit any feedback on this question.

Commission's View

- 2.12.6 The Commission notes that the majority of respondents agreed with or did not object to the proposed Termination framework for Prepaid Services, recognising Termination as a necessary control to ensure the integrity and currency of Registration records where Suspension has elapsed without rectification.
- 2.12.7 Respondents generally acknowledged that the Termination framework under paragraphs 15.1 to 15.4 is consistent with existing industry practices and system capabilities, including automated notification, Termination and number recycling in accordance with the NEAP.
- 2.12.8 The Commission has considered the concern that the three (3) days pre-Termination notice under paragraph 15.2 may be redundant given the prior Suspension period. While some Service Providers have already implemented automatic Termination upon expiry of Suspension, the Commission considers that the pre-Termination notice serves a distinct purpose and is not duplicated by the Suspension process.
- 2.12.9 Termination constitutes a permanent cessation of service and may result in forfeiture of remaining prepaid credit and loss of the assigned number. The additional notice therefore provides additional safeguards to ensure End-users are clearly informed of the impending consequences and afforded a final opportunity to regularise their information.
- 2.12.10 From a consumer-protection and enforcement perspective, the pre-Termination notice enhances procedural fairness, transparency and auditability, and supports effective dispute resolution and compliance review.
- 2.12.11 Accordingly, the Commission is to retain the proposed Termination framework under paragraphs 15.1 to 15.4, including the three (3) days pre-Termination notice under paragraph 15.2, as a reasonable and proportionate measure balancing enforcement objectives with consumer protection.

2.13 Registration of SIM Cards in Bulk

QUESTION 19: THE COMMISSION SEEKS VIEWS ON THE PROPOSED REQUIREMENT FOR REGISTRATION OF SIM CARDS IN BULK DURING SPECIAL EVENT.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi proposes that all bulk SIM Registration requests for government-related events be routed through and approved by the Commission.
Maxis	<ul style="list-style-type: none"> • Maxis takes note of the proposed requirement.
redONE	<ul style="list-style-type: none"> • redONE agrees with the proposed requirement for bulk SIM Card Registration during special events.
Redtone	<ul style="list-style-type: none"> • Redtone indicates that they have no comments on the proposed requirement for the Registration of SIM Cards in bulk during special event.
TM Tech	<ul style="list-style-type: none"> • TM Tech supports the proposed requirement for bulk SIM Card Registration during special events and agrees with including Business Entity Registration. TM Tech also highlights concerns about the broadened scope and the removal of the thirty (30) days validity and automatic Termination rules. To address this, TM Tech proposes clearly defining eligible “special events” and reinstating the thirty (30) days validity with automatic Termination to ensure proper verification, reduce misuse, and maintain operational clarity and network integrity.
Tune Talk	<ul style="list-style-type: none"> • Tune Talks takes note of the proposed requirement.
U Mobile	<ul style="list-style-type: none"> • U Mobile does not object to the proposed requirement.

Submitting Party	Comments
XOX	<ul style="list-style-type: none"> • XOX does not object to the proposed requirement.
YTLC	<ul style="list-style-type: none"> • YTLC indicates that they have no comments on the proposed bulk SIM Registration requirement but seeks clarification on the definition of a “bulk request,” including whether it involves a minimum number of SIMs or specific qualifying scenarios, to ensure consistent application across Service Providers.
SP#10	<ul style="list-style-type: none"> • SP#10 acknowledges the proposed requirement.
GSMA	<ul style="list-style-type: none"> • GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> • The respondents do not provide any feedback for this question.

Table 21: Responses to the proposed requirements for Registration of SIM Cards in bulk during special events

Summary of Feedback

- 2.13.1 The Commission acknowledges that redONE expressly agreed with the proposed requirement for bulk SIM Card Registration during special events. TM Tech supports the proposed requirement but highlights concerns about the broadened scope and the removal of the thirty (30) days validity and automatic Termination rules.
- 2.13.2 CelcomDigi proposed that bulk SIM Registration requests for government-related events be routed through and approved by the Commission. While, YTLC sought clarification on the definition of a “bulk request,” including whether it is subject to a minimum number of SIM Cards or specific qualifying scenarios.
- 2.13.3 Five (5) respondents, Maxis, Tune Talk, U Mobile, XOX and SP#10 took note of the proposed requirement without expressing direct agreement or objection. Redtone has no comment for the proposed requirement.

2.13.4 The remaining five (5) respondents, including GSMA and members of the public did not submit any feedback for this question.

Commission’s View

2.13.5 The Commission affirms that bulk Registration of SIM Cards for special events must comply with the same Registration standards applicable to Individual or Business Entity Registration, to ensure accountability, traceability and the integrity of Prepaid Services.

2.13.6 The Commission clarifies that the Mandatory Standards do not prescribe a fixed number of SIM Card for a “bulk request”. A bulk request refers to Registrations involving multiple SIM Cards for a specific, temporary event-based purpose, such as elections, political assemblies or events organised by government bodies, voluntary organisations or non-governmental organisations.

2.13.7 Regardless of the number of SIM Cards involved, each SIM Card remains subject to the applicable Registration requirements for Individual and Business Entity, respectively. Service Providers are expected to implement appropriate controls to manage bulk Registrations.

2.13.8 The Commission clarifies that the provision imposing a maximum validity period of thirty (30) days is no longer stipulated under the Mandatory Standards.

2.13.9 Accordingly, the Commission is to **retain** the proposed requirement under paragraph 16 as stipulated in the Mandatory Standards.

2.14 Obligations Relating to Dealer Appointment and Compliance

QUESTION 20: THE COMMISSION SEEKS VIEWS ON THE PROPOSED REQUIREMENTS FOR THE OBLIGATIONS RELATING TO DEALER APPOINTMENT AND COMPLIANCE.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi agrees with the requirement under paragraph

Submitting Party	Comments
	<p>17.2, provided Service Providers have flexibility in determining their own assessment criteria when onboarding or registering Dealers.</p> <ul style="list-style-type: none"> • CelcomDigi also agrees with paragraph 17.3 but requests that any new audit requirements or scope be discussed with Service Providers before implementation. • CelcomDigi proposes deleting paragraphs 17.3(b)(i), 17.3(b)(ii), and 17.3(c), citing feasibility concerns and the need for continued consultation with Service Providers on any additional audit parameters.
Maxis	<ul style="list-style-type: none"> • Maxis agrees on the importance of maintaining an accurate and up-to-date Dealers database, as it impacts incentive eligibility and performance monitoring. • Maxis also proposes revising paragraph 17.3(c) to ensure clarity by requiring that any additional matters from the Commission be subject to industry consultation.
redONE	<ul style="list-style-type: none"> • redONE agrees that robust Dealer management is required, including maintaining accurate appointment records and monitoring compliance.
Redtone	<ul style="list-style-type: none"> • Redtone indicates that they have no comments on this as they currently do not have Dealer.
TM Tech	<ul style="list-style-type: none"> • TM Tech supports the strengthened Dealers governance requirements and agrees with enhanced due diligence, oversight, and alignment with the Common Code of Conduct. TM Tech emphasises that these obligations should not create joint liability between Service Providers and Dealers, each party should remain accountable according to their respective roles. Dealers should be responsible for Registration activities, while Service Providers handle governance, training, and monitoring. • TM Tech also highlights the need for clear role separation,

Submitting Party	Comments
	traceable Dealers-level records, and supports the onboarding due diligence requirements. TM Tech proposes reinstating a minimum of twenty (20) Dealers for half-yearly audits to ensure consistent and proportionate implementation across the industry.
Tune Talk	<ul style="list-style-type: none"> • Tune Talk takes note of the proposed requirement.
U Mobile	<ul style="list-style-type: none"> • U Mobile does not object to the requirement.
XOX	<ul style="list-style-type: none"> • XOX agrees with the proposed requirements.
YTLC	<ul style="list-style-type: none"> • YTLC has no further comment with respect to the proposed requirements.
SP#10	<ul style="list-style-type: none"> • SP#10 acknowledges the proposed requirement.
GSMA	<ul style="list-style-type: none"> • GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> • The respondents do not provide any feedback for this question.

Table 22: Responses to the proposed requirements for the obligations relating to Dealers appointment and compliance

Summary of Feedback

2.14.1 The Commission acknowledges that five (5) respondents, namely CelcomDigi, Maxis, redONE, TM Tech and XOX, agreed with the proposed requirements for the obligations relating to Dealers appointment and compliance. While TM Tech supported the requirement, they highlighted the need for clear role separation between Service Providers and Dealers and suggested a minimum number of Dealers be audited each half-year to ensure proportionate implementation.

- 2.14.2 Similarly, while CelcomDigi and Maxis agreed with the proposed requirements for Dealers appointment and compliance, they requested flexibility and consultation. CelcomDigi supported the requirements under paragraphs 17.2 and 17.3 but proposed that the Service Providers be allowed to determine their own assessment criteria and that any new audit scope be discussed before implementation, including deleting certain audit items due to feasibility concerns. Maxis further agreed with the requirements and suggested that any additional matters notified by the Commission under paragraph 17.3(c) be subject to industry consultation for clarity.
- 2.14.3 Four (4) respondents, Tune Talk, U Mobile, YTLC and SP#10, took note of the proposed requirement without expressing direct agreement or objection. Redtone has no comment since they do not have any Dealers.
- 2.14.4 The remaining five (5) respondents, including GSMA and members of the public, did not provide comments for this question.

Commission's View

- 2.14.5 The Commission affirms that strong oversight of the Dealers is essential to ensure compliance with End-user Registration requirements and the integrity of Prepaid Services. The Service Providers are responsible for appointing, training, monitoring, and auditing their Dealers, while Dealers are accountable for their Registration activities.
- 2.14.6 Under paragraph 17.3, Service Providers shall conduct half-yearly Dealer audits and submit two (2) reports each year: the Dealer's Audit Report (not applicable for Service Providers without Dealers) and the Prepaid Database Audit Report, covering the first and second halves of the year.
- 2.14.7 The audit scope ensures that key risks within the Prepaid Registration ecosystem, particularly among Dealers, such as Registration without consent or the use of false information, are effectively identified and addressed. Further, as directed under section 51 of the CMA 1998, the Commission can take regulatory actions against Dealers who failed to comply with the Mandatory Standards.
- 2.14.8 The Commission is to **retain** the proposed requirements under the Mandatory Standards.

QUESTION 21: THE COMMISSION SEEKS VIEWS ON THE PROPOSED COMMON CODE OF CONDUCT (APPENDIX B OF ANNEXURE 2)

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi disagrees with the specified timelines for Dealer related processes, including the period for written submission, suspension, and repeated misconduct. CelcomDigi states that suspension procedures should remain governed by each Service Provider’s internal governance and Dealer management framework. • CelcomDigi disagrees with the proposed complaint-resolution processes and timelines. CelcomDigi notes that its complaints handling procedures are already aligned with the Mandatory Standards for Quality of Service (Customer Service) and the General Consumer Code of Practice. • CelcomDigi further states that establishing a separate resolution timeframe exclusively for Prepaid Registration related complaints are unnecessary and would duplicate existing internal processes.
Maxis	<ul style="list-style-type: none"> • Maxis refers to the requirements whereby Service Providers shall ensure that unregistered Dealers or Dealers without the capability to perform Registration, including those not equipped with secured automated platforms, are not permitted to register Individuals. • Maxis observes instances where Maxis prepaid SIM Cards have been sold by Individuals on online shopping platforms with unverifiable business information. Maxis notes that such sales have affected the ability to conduct investigations. • Maxis states that only its authorised flagship stores on recognised e-commerce platforms should be permitted to sell Maxis prepaid SIM Cards, and that unauthorised

Submitting Party	Comments
	<p>parties should not be allowed to list or sell Maxis SIM Cards on these platforms.</p> <ul style="list-style-type: none"> • Maxis states that the Service Providers should remain responsible for completing Registration, but should not be held liable for Pre-activated SIM Card sold by unregistered Dealer or Individuals. • Maxis recommends that the Commission extend enforcement and impose penalties on online platforms that enable the sale of unregistered or unauthorised SIM Cards, to strengthen accountability across the distribution chain.
redONE	<ul style="list-style-type: none"> • redONE agrees with the Commission’s proposed requirements under the Common Code of Conduct.
Redtone	<ul style="list-style-type: none"> • Redtone has no comments on the proposed Common Code of Conduct, as they do not operate through Dealers.
TM Tech	<ul style="list-style-type: none"> • TM Tech supports the proposed Common Code of Conduct, which strengthens governance, traceability and oversight of Dealers in the Registration process. • TM Tech notes that the proposed Common Code of Conduct introduces several enhancements compared with the Guidelines 2017, including mandatory onboarding controls, clearer delineation of responsibilities, strengthened security requirements, embedded enforcement steps, structured complaint handling timelines, and updated references aligned with the Determination. • TM Tech proposes that the Commission consider refinements to ensure proportionality and operational clarity: <ul style="list-style-type: none"> i. Flexibility in Dealers Identification (Unique ID) <p>TM Tech agrees with the requirement for each Dealer to have a unique identifier for traceability. TM Tech proposes that flexibility be provided for Service</p>

Submitting Party	Comments
	<p>Providers to determine the identifier's structure, format, system embedding and internal audit alignment.</p> <p>ii. Practical Flexibility in Secured Automated Platform Deployment</p> <p>TM Tech supports the requirement for secured automated platforms. TM Tech proposes that implementation be based on operational feasibility, taking into account multi-tier distribution networks and Service Providers' differing infrastructure readiness. Service Providers should retain flexibility in determining deployment sequence, platform configuration and technology used to fulfil the security intent.</p>
Tune Talk	<ul style="list-style-type: none"> • Tune Talk takes note of the Commission's proposed Common Code of Conduct.
U Mobile	<ul style="list-style-type: none"> • U Mobile does not object to the Commission's proposed Common Code of Conduct.
XOX	<ul style="list-style-type: none"> • XOX does not object to the proposed Common Code of Conduct, except in relation to the complaint handling process for Dealers. • XOX states that in cases involving serious misconduct (such as scams), the company terminates the Dealers immediately rather than applying a three (3) misconducts sequence before termination and blacklisting.
YTLC	<ul style="list-style-type: none"> • YTLC agrees with the proposed Common Code of Conduct for Dealers. However, YTLC does not agree with the requirement to submit the full Dealers database to the Commission on a routine basis, as the database contains sensitive and commercially confidential information and routine sharing may raise confidentiality and privacy concerns. • YTLC proposes that the Dealers database only be provided

Submitting Party	Comments
	upon formal request from the Commission, consistent with current practice.
SP#10	<ul style="list-style-type: none"> • SP#10 acknowledges the proposed requirement.
GSMA	<ul style="list-style-type: none"> • GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> • The respondents do not provide any feedback for this question.

Table 23: Responses to the proposed Common Code of Conduct

Summary of Feedback

- 2.14.9 The Commission notes that five (5) out of fifteen (15) respondents, namely redONE, TM Tech, U Mobile, XOX and YTLC, agreed with the Commission’s proposed Common Code of Conduct. One (1) respondent, CelcomDigi, disagreed with the proposed requirements.
- 2.14.10 Three (3) respondents (Maxis, Tune Talk and SP#10) took note of the proposal without expressing direct agreement or objection. Redtone has no comment for the proposed requirement and the remaining five (5) respondents, including GSMA and members of the public, did not submit any feedback for this question.
- 2.14.11 Respondents who agreed supported the Commission’s objective of strengthening Dealers governance, accountability and compliance, noting that the proposed Code enhances role clarity, traceability, security requirements and enforcement across the prepaid Registration distribution chain.
- 2.14.12 CelcomDigi, the sole respondent opposing the proposal, raised operational concerns relating to Dealers timelines, suspension procedures and complaint handling, citing potential duplication with existing internal governance frameworks and consumer protection codes.
- 2.14.13 Other respondents highlighted issues related to unauthorised online SIM sales, verification capability and document handling, and suggested the need for strengthened enforcement and further regulatory guidance

Commission's View

Dealers Identification and Traceability

- 2.14.14 The Commission notes feedback on the proposed Common Code of Conduct, including concerns relating to Dealer governance, suspension mechanisms, complaint handling timelines, online distribution channels and Service Providers' responsibility.
- 2.14.15 The Commission clarifies that each Dealers shall be assigned a unique identifier by the Service Providers for audit, traceability and enforcement purposes. The method of generating or integrating such identifiers is at the discretion of the Service Providers, provided regulatory objectives are met.
- 2.14.16 Accordingly, the Commission is to retain the requirement as an essential control measure for Dealer identification and traceability.

Dealers Database Management and Submission to the Commission

- 2.14.17 The Commission clarifies that Service Providers are required to establish, maintain and regularly update a complete and accurate database of all registered Dealers to support audit, traceability and enforcement.
- 2.14.18 In accordance with paragraph 4.3 of the Common Code of Conduct, Service Providers shall submit the updated Dealer database to the Commission as and when requested.
- 2.14.19 The Commission emphasises that these submission requirements are integral to regulatory oversight and must be complied with in accordance with applicable confidentiality and data protection obligations. Accordingly, the Commission is to **retain** the requirements.

Online Distribution Channels and Third-Party Platforms

- 2.14.20 The Commission notes concerns regarding prepaid SIM sales on online platforms by unauthorised parties. While recognising the enforcement challenges posed by e-commerce channels, the Commission emphasises that responsibility for Registration and activation remains with the Service Providers, as activation can only occur through the Service Providers' systems upon completion of Registration.

2.14.21 Accordingly, weaknesses arising from improperly registered SIM Cards reflect deficiencies in Dealers governance, which remain within the Service Providers' responsibility. The obligations under paragraph 5.2 of the Common Code of Conduct, which restrict Registration by unauthorised Dealers, are therefore retained.

2.14.22 Having considered the feedback, the Commission is to **retain** the Common Code of Conduct as drafted, as it is necessary and appropriately balanced to ensure Service Providers' accountability in managing Dealers and, in turn, to reinforce Dealers' compliance with the Mandatory Standards.

Dealers Misconduct and Complaint Handling Requirements

2.14.23 The Commission clarifies that the timelines and processes under paragraphs 6.1 to 6.3 of the Common Code of Conduct are established to specifically govern and escalation requirements for Dealers misconduct under the prepaid Registration framework. It was not intended to duplicate consumer complaint frameworks under the Mandatory Standards for Quality of Service or the General Consumer Code of Practice, as it is not applicable to Dealers.

2.14.24 The Commission further clarifies that the prescribed suspension and termination thresholds ensure consistency and regulatory certainty, and do not prevent Service Providers from taking immediate or stricter action in cases of serious misconduct, fraud or security breaches in accordance with applicable laws and internal governance.

2.14.25 Accordingly, the Commission is to **retain** paragraphs 6.1 to 6.3 of the Common Code of Conduct.

2.15 Reporting

QUESTION 22: THE COMMISSION SEEKS VIEWS ON THE PROPOSED REQUIREMENTS FOR AUDIT REPORT SUBMISSION AND THE REPORTING TIMELINES.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi proposes that paragraph 18 of the proposed Mandatory Standards, which sets out the requirements for audit report submission and reporting timelines, be removed in its entirety. • CelcomDigi further explains that the strengthened verification mechanisms introduced under the proposed Mandatory Standards including MyKad reader authentication, biometric (fingerprint) verification, MyDigital ID and passport reader based verification have already provided an adequate assurance framework for identity validation. In CelcomDigi’s view, these mechanisms render additional system or Registration audits unnecessary. • CelcomDigi further states that the use of automated verification platforms ensures greater accuracy and authenticated Identification Document information, thereby reducing the need for the audit obligations prescribed under the current drafting. • As an alternative position, CelcomDigi proposes that, should the Commission retain audit requirements, such audits be conducted on an incident-driven basis only, limited to circumstances where irregularities or specific concerns arise that warrant further examination.
Maxis	<ul style="list-style-type: none"> • Maxis takes note of the proposed requirements for audit report submission and reporting timelines. • However, Maxis recommends that the Commission review and consider removing the audit report submission requirement once the nationwide deployment of biometric

Submitting Party	Comments
	<p>fingerprint devices has been fully implemented.</p> <ul style="list-style-type: none"> • Maxis is of the view that, upon full deployment, the strengthened verification safeguards would already be in place, and the removal of the audit submission requirement would help streamline ongoing compliance obligations.
redONE	<ul style="list-style-type: none"> • redONE proposes that the data verification exercise be abolished, on the basis that the use of MyDigital ID would ensure that all relevant customer information is already authenticated and accurate at the point of Registration.
Redtone	<ul style="list-style-type: none"> • Redtone takes note of the proposed audit report submission requirements.
TM Tech	<ul style="list-style-type: none"> • TM Tech notes the Commission’s objective to enhance transparency and strengthen the integrity of audit processes under the proposed Mandatory Standards. • However, TM Tech is of the view that the proposed accuracy thresholds and reporting requirements should be aligned with the operational realities of the strengthened verification ecosystem introduced through MFA, MyKad/MyPassport reader authentication, OCR checks and the forthcoming MyDigital ID framework. • TM Tech further notes that the removal of the minimum twenty (20) Dealers audit sample may create uncertainty and inconsistent audit expectations. TM Tech recommends reinstating this minimum sample size as a practical and proportionate benchmark for Dealers-level audit governance. • TM Tech also highlights that the proposed accuracy thresholds were developed for a manual verification environment and may no longer represent a meaningful measure of Service Providers control. TM Tech explains that mismatches may arise from factors outside the Service Providers’ operational scope, including NRD data variances, MyKad chip read inconsistencies and historical legacy

Submitting Party	Comments
	<p>records.</p> <ul style="list-style-type: none"> • TM Tech proposes that accuracy measurements apply only to Registrations verified under MFA, MyKad/MyPassport reader validation or MyDigital ID, and that legacy data registered under older manual processes be excluded from accuracy assessments. TM Tech further proposes that accuracy indicators be calibrated as ecosystem-aligned measures rather than Service Provider’s specific compliance metrics.
Tune Talk	<ul style="list-style-type: none"> • Tune Talk takes note of the proposed audit report submission requirements and reporting timelines.
U Mobile	<ul style="list-style-type: none"> • U Mobile does not support the requirement for mandatory audit report submission. U Mobile is of the view that, given the strengthened Registration processes, the prescribed reporting obligation may be unnecessary and may impose additional administrative burden without corresponding regulatory benefit. U Mobile considers that the existing Registration safeguards already provide sufficient assurance of compliance. • U Mobile, however, supports the Commission’s authority to conduct on-site audits or spot checks where necessary. U Mobile submits that such an approach would maintain effective regulatory oversight while avoiding unnecessary operational and compliance costs for Service Providers.
XOX	<ul style="list-style-type: none"> • XOX does not object to the requirement for half-yearly audit report submissions.
YTLC	<ul style="list-style-type: none"> • YTLC takes note of the proposed audit report submission requirements under Paragraph 18 and the associated reporting timelines. • YTLC does not object to submitting the Audit of Prepaid Services End-user System Report and the Dealers Audit Report in accordance with the prescribed timelines and

Submitting Party	Comments
	<p>formats. However, YTLC proposes that the Dealers database should only be provided upon formal request from the Commission, specifically in circumstances involving suspected or confirmed fraudulent transactions or other legitimate regulatory needs.</p> <ul style="list-style-type: none"> • With respect to the Verified End-user Data Report, YTLC highlights that the requirement may no longer be necessary, given that the prepaid Registration process supported by MyKad verification, biometric authentication, and the forthcoming MyDigital ID framework have already ensured robust identity assurance and data accuracy. YTLC is of the view that an additional audit of verified End-user data may be redundant in light of these strengthened verification mechanisms.
SP#10	<ul style="list-style-type: none"> • SP#10 expressed their view on the proposed requirement.
GSMA	<ul style="list-style-type: none"> • GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> • The respondents do not provide any feedback for this question.

Table 24: Responses to the proposed requirements for audit report submission and the reporting timelines

Summary of Feedback

- 2.15.1 The Commission notes that one (1) out of fifteen (15) respondents, (XOX) agreed with the proposed half-yearly audit report submissions under paragraph 18.
- 2.15.2 Six (6) respondents (CelcomDigi, Maxis, redONE, TM Tech, U Mobile, and SP#10) did not support the proposal, arguing that the strengthened verification ecosystem (including biometric verification, MyKad/MyPassport readers, MFA and MyDigital ID) has already provided sufficient assurance and that recurring audit reporting would impose compliance burden.

- 2.15.3 Respondents who opposed the proposal generally viewed traditional audit-based reporting as less relevant given increased reliance on automated and authoritative verification systems.
- 2.15.4 TM Tech, proposed reinstating minimum Dealer audit sample sizes, and limiting accuracy measurements to Registrations verified through enhanced verification mechanisms.
- 2.15.5 YTLC expressed partial support, agreed with Audit of Prepaid Services End-user System Report and Dealer Audit Report submissions but proposing that Dealer databases be submitted only upon request, and questioning the need for a separate "Verified End-user Data Report".
- 2.15.6 Tune Talk took note of the proposal without expressing a position, while the remaining five (5) respondents, including GSMA and members of the public, did not submit any feedback.

Commission's View

- 2.15.7 The Commission notes that a majority of respondents do not support mandatory, recurring audit report submissions under paragraph 18. Instead, the respondents proposed a targeted or incident-driven approach in view of the strengthened verification ecosystem (including biometric verification, MFA, and MyDigital ID).
- 2.15.8 While these measures significantly enhance identity assurance at the point of Registration, the Commission considers that they do not remove the need for structured reporting for regulatory oversight.
- 2.15.9 The Commission further considers that limiting audits solely to complaint or incident-driven scenarios would reduce regulatory visibility. Periodic audit and standardised reporting support consistent oversight, early risk detection and organisational accountability, reinforced through board-authorised declarations.
- 2.15.10 Accordingly, the Commission is to **retain** the reporting and audit requirements under paragraphs 18.1 to 18.4 as proposed, including half-yearly submissions in the prescribed format.
- 2.15.11 Additionally, the Commission is to **reinstate** a minimum audit sample of twenty (20) Dealers to provide clarity and consistency in Dealers level audit expectations.

QUESTION 23: THE COMMISSION SEEKS VIEWS ON THE PERCENTAGE OF INACCURACY OF AUDITED VERIFIED END-USER DATA WITH THE IDENTITY AUTHORITY.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi reiterates its position that Paragraph 18 of the Proposed Mandatory Standards should be deleted in its entirety, including all associated reporting and accuracy threshold requirements. • In line with this position, CelcomDigi proposes the deletion of the requirement specifying the percentage of inaccuracy of audited verified End-user data with the Identity Authority. • CelcomDigi therefore does not support the proposed inaccuracy thresholds (1% from 2026 and 0.5% from 2027) or the associated formula for calculating False Registration.
Maxis	<ul style="list-style-type: none"> • Maxis acknowledges the importance of maintaining accurate Registration data. • Maxis notes that once the enhanced verification methodology (including biometric fingerprint deployment) is fully implemented, Registration processes will already ensure stronger data accuracy. • Consistent with its response to Question 22, Maxis recommends that the requirement to report on inaccuracy percentages of audited verified End-user data with the Identity Authority be removed altogether. • Maxis states that removing this requirement would streamline compliance obligations while relying on the strengthened verification safeguards already built into the improved Registration framework.
redONE	<ul style="list-style-type: none"> • redONE disagrees with the proposed requirement relating to the percentage of inaccuracy of audited verified End-user

Submitting Party	Comments
	<p>data with the Identity Authority.</p> <ul style="list-style-type: none"> redONE proposes abolishing the data verification exercise entirely, stating that with MyDigital ID in place, verification would no longer be necessary as the data will already be accurate.
Redtone	<ul style="list-style-type: none"> Redtone provides comments on the requirement.
TM Tech	<ul style="list-style-type: none"> TM Tech supports maintaining an accuracy requirement for verified End-user data but believes the requirement must reflect the strengthened verification ecosystem enabled through MFA, OCR/MyKad reader checks, and the forthcoming MyDigital ID framework. TM Tech proposes retaining a single accuracy threshold of not more than 1% from 1 January 2026 onward, as system-level authentication will increasingly determine verification outcomes rather than operator specific processes. TM Tech considers the proposed thresholds of 1% (2026) and 0.5% (2027) significant changes that do not align with the realities of the new verification ecosystem. TM Tech notes that accuracy variances will mainly arise from NRD data inconsistencies, MyKad chip-read issues, and formatting differences in personal information, which fall outside the control of Service Providers. TM Tech views tightening the threshold below 1% as disproportionate, since verification performance is increasingly shaped by automated, authoritative sources such as MFA and MyDigital ID. TM Tech believes a single 1% threshold provides a fair and realistic benchmark that reflects ecosystem wide verification integrity. TM Tech proposes maintaining a uniform 1% accuracy requirement from 1 January 2026, applying it only to Registrations verified through MFA or MyDigital ID, and treating accuracy as an ecosystem indicator rather than a

Submitting Party	Comments
	<p>compliance penalty.</p> <ul style="list-style-type: none"> • TM Tech concludes that this approach ensures fairness, practicality, and alignment with Malaysia’s MFA/MyDigital ID direction while maintaining consumer trust and safeguarding Registration integrity.
Tune Talk	<ul style="list-style-type: none"> • Tune take note of this requirement.
U Mobile	<ul style="list-style-type: none"> • U Mobile proposes that the requirement be removed from the framework, stating that the existing Registration controls together with MCMC’s discretionary audit powers already provide sufficient safeguards for data integrity. • U Mobile considers that retaining this requirement would introduce unnecessary compliance complexity without adding meaningful benefit.
XOX	<ul style="list-style-type: none"> • XOX rejects responsibility for accuracy thresholds on the basis that verification is conducted through MyDigital ID and NRD, indicating disagreement with the requirement for Service Providers to meet or be accountable for such accuracy levels.
YTLC	<ul style="list-style-type: none"> • YTLC raises concerns about the continued requirement to audit verified End-user data with the Identity Authority, including the inaccuracy thresholds of 1% (2026) and 0.5% (2027). • YTLC states that the use of MyDigital ID and biometric verification under the Mandatory Standards will already ensure a reliable and accurate Registration process. • YTLC proposes that Item 3 be removed from the Mandatory Standards’ half-yearly report, while allowing the Commission to retain the discretion to conduct verifications or audits when necessary.
SP#10	<ul style="list-style-type: none"> • SP#10 requested consideration for reviewing the proposed requirement.

Submitting Party	Comments
GSMA	<ul style="list-style-type: none"> GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> JL Wong considers the proposed inaccuracy rate of 1% for verified End-user data to be too high and unacceptable. He recommends significantly stricter thresholds, proposing a maximum inaccuracy rate of 0.1% from 1 January 2026, 0.05% from 1 January 2027, and 0% from 2028 onward, particularly since the data is verified against authoritative identity sources.

Table 25: Responses to the proposed percentage of inaccuracy of audited verified End-user data with the Identity Authority

Summary of Feedback

- 2.15.12 The Commission notes that none of the fifteen (15) respondents supported the proposed inaccuracy percentage of 1% (2026) and 0.5% (2027), nor the formula or methodology set out in the draft Mandatory Standards.
- 2.15.13 A majority of respondents, seven (7) out of fifteen (15), including CelcomDigi, Maxis, redONE, U Mobile, YTL, XOX and SP#10) did not support the requirement and recommended its removal, citing the strengthened verification framework incorporating MyDigital ID, biometric authentication and MFA.
- 2.15.14 Several respondents emphasised that identity accuracy under the new ecosystem is primarily determined by authoritative NRD/IDM systems rather than Service Providers, and that holding Service Providers accountable for inaccuracies beyond their control would introduce disproportionate compliance and reporting burdens without improving data integrity.
- 2.15.15 Two (2) respondents (TM Tech and JL Wong) proposed alternative approaches. TM Tech recommended a single 1% percentage from 1 January 2026 limited to MFA or MyDigital ID-verified Registrations; while public respondent JL Wong advocated progressively stricter limits.
- 2.15.16 Tune Talk took note of the proposed requirement without expressing direct agreement or objection, whilst GSMA and the other three (3) members of

the public, did not submit any feedback on the requirement.

Commission's View

- 2.15.17 The Commission notes that no respondents supported the proposed inaccuracy percentage. Feedback generally favoured the removal of the requirement or suggested alternative percentage, citing strengthened verification mechanisms and the phased implementation of the MyDigital ID.
- 2.15.18 Having considered the feedback, the Commission clarifies that paragraph 18.5 is intended to provide a systemic data quality monitoring benchmark, rather than to attribute fault for Individual discrepancies. In the absence of any quantitative benchmark, regulatory visibility into ecosystem wide data integrity would be reduced, particularly during the transition period where multiple verification pathways and legacy datasets coexist.
- 2.15.19 At the same time, the Commission agrees with the respondents that tightening the percentage beyond 1% at this stage may not be proportionate, as inaccuracies may arise from external systems rather than Service Providers' processes.
- 2.15.20 Accordingly, the Commission is to **revise paragraph 18.5** with a single inaccuracy percentage of not more than 1% effective from 1st July 2026 and does not proceed with the proposed reduction to 0.5% from 1 January 2027.

"18.5 Percentage for inaccuracy of audited verified End-user data with Identity Authority, shall be not more than 1% of the total number of Registration received effective from 1st July 2026."

2.16 Identification of SIM Card Registered

QUESTION 24: THE COMMISSION SEEKS VIEWS ON THE REQUIREMENT FOR THE IDENTIFICATION OF SIM CARD REGISTERED.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi takes note of the requirement for the Identification of SIM Cards registered under an Individual. • CelcomDigi informs that this feature is already available through its CelcomDigi mobile application. • Customers may also visit CelcomDigi retail outlets to enquire and verify the number of SIM Cards registered under their names.
Maxis	<ul style="list-style-type: none"> • Maxis takes note of the requirement for the Identification of SIM Cards registered under an Individual. • Maxis states that it currently provides multiple channels for customers to verify the mobile numbers registered under their identity, supporting efforts to prevent Unauthorised Registrations.
redONE	<ul style="list-style-type: none"> • redONE agrees with the requirement for the identification of SIM Cards registered under an Individual.
Redtone	<ul style="list-style-type: none"> • Redtone indicates that they have no comments on the requirement for the identification of SIM Cards registered under an Individual.
TM Tech	<ul style="list-style-type: none"> • TM Tech agrees with the proposed requirement. TM Tech notes that it aligns with the existing obligation under the Guidelines 2017 and supports consumer protection by enabling End-users to verify SIMs registered under their name. • TM Tech observes that the updated drafting provides clearer references to "End-user," reinforces visibility to

Submitting Party	Comments
	<p>prevent Unauthorised Registrations, and clearly assigns responsibility to the Service Providers.</p> <ul style="list-style-type: none"> • TM Tech proposes that the mechanism for SIM identification remain flexible to accommodate differing system architectures and customer interface channels. TM Tech recommends allowing Service Providers to determine suitable delivery methods (e.g. mobile apps, self-care portals, USSD, SMS, or other secure platforms).
Tune Talk	<ul style="list-style-type: none"> • Tune Talk takes note of the requirement. Tune Talk currently provides a feature in its mobile application that allows users to view all SIM Cards registered under their identification. • For non-Tune Talk users, verification requests may be made through Customer Service and will be processed upon sufficient identity verification to ensure authenticity and prevent misuse.
U Mobile	<ul style="list-style-type: none"> • U Mobile does not object to this requirement.
XOX	<ul style="list-style-type: none"> • XOX does not object to this requirement.
YTLC	<ul style="list-style-type: none"> • YTLC supports the proposed requirement for providing a mechanism that allows End-user to identify the SIM Cards registered under their identification.
SP#10	<ul style="list-style-type: none"> • SP#10 seeks clarification on the proposed requirement.
GSMA	<ul style="list-style-type: none"> • GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> • JL Wong proposes that Service Providers introduce an annual re-verification mechanism for users, to be completed within five days of the user's birthday. The process should require MyDigital ID and OTP (via SMS) using a QR code generated through the Service Providers'

Submitting Party	Comments
	website or application. Failure to complete the re-verification should result in Termination of the prepaid number.

Table 26: Responses to the proposed requirements for the identification of SIM Card registered

Summary of Feedback

- 2.16.1 The Commission notes that five (5) out of fifteen (15) respondents including redONE, TM Tech, U Mobile, XOX and YTLC, agreed with the requirement for the identification of SIM Cards registered under an Individual. Four (4) respondents including, CelcomDigi, Maxis, Tune Talk and SP#10 took note of the proposed requirement without expressing agreement or objection. Redtone has no comment for the proposed requirement.
- 2.16.2 JL Wong provided his view to enhance this proposed requirement while, the remaining four (4) respondents including GSMA, Ezzam Mohlarom, Heng Tun Kiat and Mohammad Firas Faiq did not submit any feedback for this question.
- 2.16.3 Respondents supported the proposal, indicating that it enhances consumer protection and transparency by enabling End-users to identify SIM Cards registered under their names, and that it aligns with existing industry practices and can be implemented through secure digital channels such as mobile applications and self-care portals.
- 2.16.4 Respondents who took note of the proposal indicated that similar mechanisms already exist through customer service channels or retail touchpoints and did not raise feasibility or implementation concerns.
- 2.16.5 JL Wong proposed an annual re-verification mechanism using MyDigital ID and OTP authentication, with Termination for non-compliance.
- 2.16.6 One respondent sought clarification on post-verification procedures under MyDigital ID, particularly in relation to current limitations affecting certain user categories, and recommended that standardised guidance be issued to support consistent industry implementation.

Commission's View

Implementation Flexibility

- 2.16.7 The Commission notes support for the requirement allowing End-users to identify SIM Cards registered under their name and clarifies that the Mandatory Standards do not prescribe a specific technical method. Service Providers may implement this requirement through any secure and accessible channel, provided End-users can reliably ascertain the number of SIM Cards registered under their identity.
- 2.16.8 The Commission considers it acceptable for Service Providers to display only the total number of registered SIM Cards without disclosing MSISDN details, as the objective is to detect potential Unauthorised Registrations while avoiding unnecessary security risks.

Integration with MyDigital ID

- 2.16.9 The Commission clarifies that verification and whitelisting mechanisms shall align with the current scope of MyDigital ID availability, which presently applies to Malaysian End-users, and may be expanded as national digital identity frameworks evolve.
- 2.16.10 Where discrepancies or Unauthorised Registrations are identified, End-users may escalate the matter to the relevant Service Providers for verification and rectification in accordance with prescribed processes.

Periodic Re-verification Proposals

- 2.16.11 The Commission has considered proposals for mandatory periodic re-verification but is of the view that such measures may be disproportionate at this stage and are therefore not mandated under the Mandatory Standards.
- 2.16.12 Accordingly, the Commission is to **retain** the requirement for a free and accessible SIM identification mechanism, while allowing implementation flexibility and ensuring proportionality.

2.17 The Use of Watermark

QUESTION 25: THE COMMISSION SEEKS VIEWS ON THE REQUIREMENT FOR THE USE OF WATERMARK TO SECURE IDENTIFICATION DOCUMENT DURING REGISTRATION.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi acknowledges the requirement to use watermarks on copies of Identification Documents collected for prepaid Registration. However, they point out that, according to the proposed Mandatory Standards, this requirement applies only to Self-Registration for Malaysians.
Maxis	<ul style="list-style-type: none"> • Maxis takes note of the requirement as this has been implemented since the issuance of Guidelines 2017.
redONE	<ul style="list-style-type: none"> • redONE takes note of the requirement for using a Watermark to secure Identification Documents, which helps enhance security and authenticity.
Redtone	<ul style="list-style-type: none"> • Redtone indicates that they have no comment to the proposed requirement.
TM Tech	<ul style="list-style-type: none"> • TM Tech does not object to the Watermark requirement for securing Identification Documents during prepaid Registration. • TM Tech supports the measure as it enhances confidentiality, authenticity, and data protection. However, TM proposes that the requirement be applied in a targeted and proportionate manner limited only to essential Identification Documents used for verification. • TM Tech also suggests refining the scope, ensuring purpose limitation, and allowing flexibility in Watermark format to align with PDPA principles and operational

Submitting Party	Comments
	efficiency.
Tune Talk	<ul style="list-style-type: none"> • Tune Talk takes note of the proposed requirement.
U Mobile	<ul style="list-style-type: none"> • U Mobile does not object to the requirement.
XOX	<ul style="list-style-type: none"> • XOX does not agree with the requirement, stating that watermarks are redundant since MyDigital ID will include verification via NRD.
YTLC	<ul style="list-style-type: none"> • YTLC takes note of the proposed requirement.
SP#10	<ul style="list-style-type: none"> • SP#10 does not object to the proposed requirement.
GSMA	<ul style="list-style-type: none"> • GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> • The respondents did not provide any feedback for this question.

Table 27: Responses to the proposed requirements for the use of Watermark to secure the Identification Document during Registration

Summary of Feedback

2.17.1 The Commission acknowledges that four (4) respondents, namely Maxis, redONE, Tune Talk, and YTLC, took note of the proposed requirement without expressing direct agreement or objection to the use of Watermark to secure Identification Document during Registration.

2.17.2 CelcomDigi, also took note of the requirement but highlighted that, based on the proposed Mandatory Standards, it appears to apply only to Self-Registration for Malaysians. XOX disagreed with the Watermark requirement. They further stated that since MyDigital ID will be implemented with direct verification via NRD, the use of a Watermark on the Identification Document is redundant and unnecessary.

- 2.17.3 Three (3) respondents, namely TM Tech, U Mobile and SP#10 have no objection to the proposed requirement with TM supported the requirement as a means to enhance confidentiality, authenticity and data protection, while suggesting that its application be targeted to essential Identification Document and allow flexibility in the Watermark format. Redtone has no comment for the proposed requirement.
- 2.17.4 The remaining five (5) respondents, including GSMA and members of the public did not submit any feedback for this question.

Commission's View

- 2.17.5 The Commission considers that the requirement for the use of Watermark is necessary to safeguard copies of the Identification Document collected during prepaid Registration and to mitigate the risks of misuse, unauthorised reproduction, and secondary use beyond the intended purpose.
- 2.17.6 In accordance with paragraph 20.1, Service Providers shall ensure that Watermark is applied to copies of Identification Document collected via online and/or secured automated platforms for the purpose of Prepaid Service Registration. This requirement complements existing verification mechanisms, including MyDigital ID and data verification with NRD, and strengthens the security of digital Registration processes.
- 2.17.7 Accordingly, the Commission is to **retain** the proposed requirement for the use of Watermark as stipulated under the Mandatory Standards.

2.18 SIM Card Replacement Process

QUESTION 26: THE COMMISSION SEEKS VIEWS ON THE REQUIREMENTS SIM CARD REPLACEMENT PROCESS.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> CelcomDigi proposes that paragraph 21 of the Proposed Mandatory Standards, which outlines the SIM Card replacement process, be deleted in its entirety.

Submitting Party	Comments
	<ul style="list-style-type: none"> • CelcomDigi is of the view that SIM Card replacement is not a Registration process and should not be treated as one under the Mandatory Standards. • CelcomDigi states that SIM Card replacement occurs for various operational reasons including technology upgrades (e.g., 4G to 5G, normal SIM to nano SIM), lost SIMs, or faulty SIMs and does not require customers to undergo re-Registration. • CelcomDigi therefore disagrees with the procedural requirements listed under paragraph 21 (including verification of frequently called numbers, last reload date, and proof of purchase), stating that these requirements should not apply to SIM Card replacement.
Maxis	<ul style="list-style-type: none"> • Maxis takes note that paragraph 21 of Mandatory Standards specifically addresses SIM Card replacement procedures rather than the Registration of new Prepaid Services. • Maxis proposes that paragraph 21 be removed from the Mandatory Standards on Prepaid Registration, as SIM Card replacement is a separate operational process. • Maxis states that SIM Card replacement follows its own verification and service flow, which typically requires the customer to be physically present at the Service Providers' outlet for security and identity validation. • Maxis highlights that including SIM Card replacement requirements within prepaid Registration standards may create confusion in implementation and compliance.
redONE	<ul style="list-style-type: none"> • redONE seeks confirmation on whether the requirement applies only to the approval and validation process conducted by the Service Providers, or whether it also covers the physical handling and submission of SIM Card replacement requests by Dealer under the Service Providers' supervision. • redONE states that it plans to introduce eKYC for SIM

Submitting Party	Comments
	<p>Card replacement in the future and asks whether, in walk-in scenarios, compliance with paragraph 17.2(a) to (c) would still be required. redONE proposes that these requirements should not apply once eKYC is implemented.</p> <ul style="list-style-type: none"> • redONE highlights that the verification requirement under paragraph 17.2(a) is not a standard practice across the industry. • redONE states that paragraph 17.2(b) is not operationally viable, as most customers would not remember their last reload amount and date. • redONE takes notes that with future use of eKYC and MyDigital ID verification for SIM Card replacement, Dealer should be permitted to perform SIM Card replacements under these secure verification methods. • redONE explains that it operates only eight (8) branches nationwide with limited coverage, which is why Dealer participation in the SIM Card replacement process remains necessary.
Redtone	<ul style="list-style-type: none"> • Redtone provides comments on the requirement.
TM Tech	<ul style="list-style-type: none"> • TM Tech supports and does not object to the inclusion of a standard SIM Card replacement process in the Determination, recognising the Commission’s intent to reduce fraudulent SIM swaps and strengthen prepaid ecosystem integrity. • TM Tech takes note of the proposed requirement for SIM Card replacement to be performed by the Service Providers, aligns with existing industry practice, while emphasising that SIM Card replacement is operationally distinct from prepaid Registration and should focus on confirming rightful ownership rather than re-Registration. • TM Tech highlights that operational models may evolve and that secure authorised channels under the Service Providers’ governance may be needed to improve

Submitting Party	Comments
	<p>customer accessibility for SIM Card replacement.</p> <ul style="list-style-type: none"> • TM Tech proposes allowing flexible SIM Card replacement processes through authorised channels under the Service Providers’ governance to enhance customer experience and operational efficiency. • TM Tech recommends adopting a proportionate and flexible verification structure using identification checks and the ownership verification methods in paragraph 21.2. • TM Tech proposes that the Determination clearly state that SIM Card replacement is not a form of prepaid Registration to avoid misclassification under obligations related to unauthorised Registration. • TM Tech recommends framing SIM Card replacement requirements in a technology-neutral manner to ensure applicability to both physical SIMs and eSIM processes.
Tune Talk	<ul style="list-style-type: none"> • Tune Talk explains that it does not operate any official flagship store and that authorised Dealers currently handle the physical submission of SIM Card replacement requests, while Tune Talk’s internal validation team performs the review and approval before any replacement is executed. • Tune Talk seeks confirmation that its existing operational model where Dealer submits requests and Tune Talk undertakes the validation and approval remains consistent with the intent of the requirement that SIM Card replacement be undertaken by the Service Providers. • Tune Talk highlights that many data-centric customers may not have outgoing call records, as their communication is conducted primarily through applications such as WhatsApp, which may make the requirement for “frequently called numbers” impractical. • Tune Talk proposes that Service Providers be allowed

Submitting Party	Comments
	flexibility to implement additional or alternative verification methods to establish legitimate ownership in cases where call records are insufficient or unavailable.
U Mobile	<ul style="list-style-type: none"> • U Mobile states that restricting SIM Card replacement to Service Providers branches would force customers to travel long distances, create service delays and dissatisfaction, limit accessibility for rural and remote communities, and increase operational costs for both customers and Service Providers. • U Mobile proposes that selected or exclusive Dealers be authorised to perform SIM Card replacements, noting that these Dealers have wider geographical coverage, are already trained and equipped with the necessary systems, and can provide immediate service to customers in remote areas.
XOX	<ul style="list-style-type: none"> • XOX do not agree with the verification requirements.
YTLC	<ul style="list-style-type: none"> • YTLC states that its existing SIM Card replacement processes already ensure strong security, as subscribers must visit Yes Stores with their MyKad and undergo biometric authentication, or submit requests through the Mobile App using login credentials and verification. • YTLC highlights that these existing mechanisms sufficiently safeguard subscriber identity and prevent unauthorised SIM Card replacement. • YTLC raises practical concerns with the proposed verification requirements under paragraph 21.2, stating that requesting the three (3) most frequently called numbers and last reload details is impractical, as subscribers often do not remember such information and modern communication largely occurs through OTT apps such as WhatsApp. • YTLC notes that requiring SIM pack evidence or authorisation letters in all cases imposes unnecessary burdens on both subscribers and Service Providers.

Submitting Party	Comments
	<ul style="list-style-type: none"> • YTLC states that it does not agree with the proposed paragraph 21 and proposes that the process outlined in paragraph 7.1 of the Mandatory Standards be applied to SIM Card replacement instead. • YTLC respectfully requests that the Commission consider aligning the SIM Card replacement requirements with current practical and secure procedures that ensure identity verification while minimising burdens on subscribers and Service Providers.
SP#10	<ul style="list-style-type: none"> • SP#10 agrees with the proposed requirements.
GSMA	<ul style="list-style-type: none"> • GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> • The respondents do not provide any feedback for this question.

Table 28: Responses to the proposed requirements for the SIM Card replacement process

Summary of Feedback

- 2.18.1 The Commission notes that two (2) out of fifteen (15) respondents, namely TM Tech and SP#10, agreed the inclusion of a standard SIM Card replacement process within the Mandatory Standards. These respondents recognised the need for safeguards against fraudulent SIM Card replacement and a consistent industry baseline.
- 2.18.2 Seven (7) respondents (CelcomDigi, Maxis, redONE, Tune Talk, U Mobile, XOX, YTLC) did not support the proposed requirements as drafted, viewing SIM Card replacement as an operational activity distinct from prepaid Registration.
- 2.18.3 Several respondents proposed the removal of paragraph 21, emphasising that SIM Card replacement commonly arises from loss, damage or technology upgrades and should not require Registration method verification such as call history, reload information or SIM Card pack evidence.

- 2.18.4 Practical concerns were also raised regarding the feasibility of the proposed verification checks, noting modern usage patterns (e.g. limited voice calls, reliance on OTT applications) and the unavailability of certain data.
- 2.18.5 Some respondents highlighted the importance of authorised Dealer, particularly in underserved areas, and proposed allowing Dealers in assisting SIM Card replacement.
- 2.18.6 TM Tech supported inclusion with refinements, proposed that SIM Card replacement be clearly distinguished from prepaid Registration, supported by proportionate ownership verification and flexible, technology-neutral processes applicable to both physical SIMs and eSIMs.
- 2.18.7 Overall, while respondents generally supported stronger security in SIM Card replacement, the majority considered paragraph 21 to be impractical or overly prescriptive, recommending deletion or substantial revision in favour of flexible, ownership focused verification measures.

Commission's View

- 2.18.8 The Commission's notes that feedback received on the proposed SIM Card replacement process reflects divergent views on whether SIM Card replacement should be regulated within the Mandatory Standards, as well as concerns relating to operational practicality, customer accessibility, and verification methods.
- 2.18.9 The Commission clarifies that the inclusion of SIM Card replacement provisions is not intended to reclassify SIM Card replacement as prepaid Registration, but to establish baseline safeguards against unauthorised SIM Card replacement, which remain a key fraud risk.
- 2.18.10 SIM Card replacement shall be undertaken under the sole responsibility and authority of the Service Providers. The Service Providers shall ensure that all verification, validation and approval decisions relating to SIM Card replacement are performed in accordance with its governance framework and internal controls.
- 2.18.11 The Commission acknowledges concerns regarding the practicality of certain verification data points and clarifies that, for SIM Card replacement, Service Providers are required to verify the authenticity of the Identification Document through biometric authentication or MyDigital ID, and to verify at least one (1) additional information as prescribed under

the Mandatory Standards, subject to auditability.

2.18.12 Accordingly, the Commission is to **revise paragraph 21.2** as follows:

"21.2 For the purposes of SIM Card replacement, the Service Provider is required to verify the authenticity of the Identification Document with biometric authentication or MyDigital ID and shall also verify at least one (1) information related to usage of the Prepaid Services."

2.19 SIM Card Delivery

QUESTION 27: THE COMMISSION SEEKS VIEWS ON THE DELIVERY METHODS OF SIM CARDS, INCLUDING MAIL DELIVERY AND SELF-COLLECTION.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi does not agree with the proposed requirement of SIM Card Delivery and proposes it to be reviewed. • For mail delivery, CelcomDigi is of the view that Service Providers should be allowed flexibility to implement any secured delivery method. CelcomDigi notes that SIM activation only occurs after successful Registration, not at the point of delivery. • For self-collection, CelcomDigi highlights that processes differ across Service Providers. At CelcomDigi, Registration is deemed successful once the SIM is activated. For SIM collection (where applicable), CelcomDigi is of the view that requiring the customer to present confirmation of the SIM purchase is sufficient to address delivery verification.
Maxis	<ul style="list-style-type: none"> • Maxis seeks clarification on whether the requirement applies solely to the delivery of new SIM packs for Prepaid Services Registration, or whether it also extends to SIM Card replacements.

Submitting Party	Comments
	<ul style="list-style-type: none"> Maxis explains that, for SIM Card replacements, customers are required to be physically present at Maxis service centres for identity verification and SIM Card issuance and therefore no delivery is involved for replacement cases.
redONE	<ul style="list-style-type: none"> redONE agrees with the proposed delivery methods for SIM Cards, including mail delivery and self-collection.
Redtone	<ul style="list-style-type: none"> Redtone indicates that they have no comments on the proposed delivery methods of SIM Cards.
TM Tech	<ul style="list-style-type: none"> TM Tech does not object to the introduction of a dedicated SIM delivery requirement, noting alignment with the objective of ensuring that SIM Cards are delivered and activated only by the rightful registered End-user. TM Tech notes that subparagraph 22.1(a) which prescribes a specific activation method for Mail Delivery, and highlights that prescribing an activation code or MFA delivered via the End-user's preferred channel may not reflect the differing systems, delivery ecosystems and authentication capabilities across Service Providers. TM Tech explains that its current delivery process already incorporates secure safeguards to ensure the SIM remains inactive until End-user verification. TM Tech proposes that the requirement under Mail Delivery to allow flexibility for Service Providers to adopt any secure, auditable and effective identity verification mechanism for SIM activation under Mail Delivery, rather than mandating a fixed method. TM Tech further proposes that flexibility be maintained to accommodate existing secure delivery processes, system and delivery partner capabilities, risk based authentication mechanisms, and future enhancements such as in-app verification, advanced MFA or MyDigital ID integration.

Submitting Party	Comments
Tune Talk	<ul style="list-style-type: none"> • Tune Talk takes note of the requirement for the delivery methods of SIM Cards.
U Mobile	<ul style="list-style-type: none"> • U Mobile proposes that Mail Delivery allow verification through the delivery agent sighting the End-user’s original Identification Document during the delivery process.
XOX	<ul style="list-style-type: none"> • XOX disagrees with the proposed process for the delivery methods of SIM Cards.
YTLC	<ul style="list-style-type: none"> • YTLC takes note of the proposed requirement on the delivery methods of SIM Cards.
SP#10	<ul style="list-style-type: none"> • SP#10 does not object to the proposed requirement.
GSMA	<ul style="list-style-type: none"> • GSMA does not provide any feedback for this question.
Public	<ul style="list-style-type: none"> • The respondents do not provide any feedback for this question.

Table 29: Responses on the delivery methods of SIM Cards, including Mail Delivery and Self-Collection

Summary of Feedback

2.19.1 The Commission notes that three (3) respondents (redONE, TM Tech and SP#10) agreed with the proposed SIM Card delivery methods, while two (2) respondents, namely CelcomDigi and XOX, disagreed with the proposal. Meanwhile, four (4) respondents (Maxis, Tune Talk, U Mobile and YTLC) took note of the proposed requirement without expressing direct agreement or objection. Redtone has no comment for this requirement. The remaining five (5) respondents, including GSMA and members of the public, did not submit any feedback for this question.

2.19.2 Respondents supporting the proposal considered the prescribed delivery methods to enhance security by ensuring SIM Cards are delivered and

activated only by the rightful End-user. They note that the requirements align with existing industry practices and can be implemented through secure, auditable delivery and identity verification processes.

- 2.19.3 Respondents who disagreed raised operational concerns. CelcomDigi proposed allowing flexibility for Service Providers to adopt any secure delivery mechanism, noting that activation only occurs after successful Registration and that proof of purchase may suffice for verification. XOX similarly did not support the prescribed delivery methods.
- 2.19.4 Respondents who took note of the proposal sought operational clarification, including whether the requirement applies to SIM Card replacements. Maxis highlighted that replacement processes involve in-person verification rather than delivery, while others described existing delivery and verification practices and requested flexibility to accommodate current delivery and authentication models.

Commission's View

Scope of Application

- 2.19.5 The Commission clarifies that paragraph 22 establishes a mandatory final assurance control prior to activation, intended to ensure that prepaid SIM Card is issued to and activated by the rightful End-user. Service Providers shall ensure that the implementation of this control, regardless of the operational method adopted, achieves an assurance level consistent with the requirements under these Mandatory Standards.

SIM Card Delivery

- 2.19.6 Taking into account feedback by the respondents, the Commission agrees that Service Providers shall adopt flexible activation mechanisms, provided these mechanisms meet the prescribed minimum assurance requirements. While identity verification at the point of delivery may be implemented as part of internal risk controls, regulatory compliance remains anchored on completing secure activation safeguards.
- 2.19.7 The Commission affirms that the Service Providers shall implement secure and effective identity verification mechanism for SIM activation. Delivery requirements form an integral part of the prepaid Registration and activation framework acts as the final safeguard against unauthorised access or misuse, regardless of the delivery method.

2.19.8 The Commission is to **revise the term** “SIM Card Delivery” to “SIM Card Handover” to cover permitted methods by which prepaid SIM Card is provided to the End-user, including delivery and self-collection.

2.19.9 Accordingly, the Commission is to **revise paragraph 22.1(a)** as follows:

“22.1(a) Delivery (includes but not limited to postal/courier services or in-person hand-over): in activating the SIM Card, the Service Provider shall provide any secure and effective identity verification mechanism for SIM activation to the End-user upon completion of delivery.”

2.20 Additional Views Sought

QUESTION 28: THE COMMISSION WELCOMES ADDITIONAL FEEDBACK, CONCERNS, OR SUGGESTIONS THAT STAKEHOLDERS OR RESPONDENTS BELIEVE SHOULD BE TAKEN INTO CONSIDERATION FOR IMPROVING THE PROPOSED MANDATORY STANDARDS.

Submitting Party	Comments
CelcomDigi	<ul style="list-style-type: none"> • CelcomDigi reiterates the need for a prepaid Registration framework that is sustainable and supports consumer security and industry accountability. CelcomDigi notes that the mandatory fingerprint biometric requirement is dependent on the National Registration Department’s roadmap for the next-generation identity card, and that implementation will involve significant financial considerations, including the cost inefficiency of procuring two different sets of biometric scanners. • CelcomDigi proposes an implementation period of eighteen (18) months to accommodate procurement of biometric scanners and passport readers, system assessment and development for secure integration, and deployment across sales channels with simultaneous training for internal teams and Dealers.
Maxis	<ul style="list-style-type: none"> • Maxis notes that the implementation of SIM Card limits may not address the underlying causes of fraud. Maxis

Submitting Party	Comments
	<p>observes that stricter SIM Card limitations may shift fraudulent activity toward alternate channels, including foreign SIM Cards, VoIP numbers, OTT communication platforms, device-level compromise, and identity misuse involving third-party biometric holders. Maxis further notes the potential for increased network layer abuse such as the use of Fake Base Transceiver Station (“BTS”) equipment.</p> <ul style="list-style-type: none"> • Maxis highlights that weaknesses in Dealer practices are a significant contributor to fraudulent Registrations. Maxis is of the view that measures aimed at strengthening Dealer controls, verification processes, training, digital KYC mechanisms, audits, and penalties would be more effective in addressing Registration integrity. • Maxis notes that establishing a cross-operator system to enforce SIM Cards limits for foreign nationals would involve substantial capital expenditure, cybersecurity safeguards, system redundancy and ongoing maintenance, leading to increased operational costs without clear evidence of equivalent regulatory benefit. • Maxis also notes that smaller Service Providers may face disproportionate cost impacts, potentially affecting competition and financial sustainability. Maxis states that such costs are unlikely to be passed on to End-users, given current market conditions and policy emphasis on affordability.
redONE	<ul style="list-style-type: none"> • redONE seeks clarification on several operational and implementation aspects of the proposed Mandatory Standards.
Redtone	<ul style="list-style-type: none"> • Redtone has no additional feedback, concerns, or suggestions on the proposed Mandatory Standards.
TM Tech	<ul style="list-style-type: none"> • TM Tech reiterates the need for a minimum twelve (12) months transition period to ensure MyDigital ID and MFA integration, Dealer readiness, industry testing, system

Submitting Party	Comments
	<p>stabilisation, and coordinated change management. A shorter period may lead to inconsistent compliance and operational disruption.</p> <ul style="list-style-type: none"> • TM Tech notes concerns with making MyDigital ID the exclusive mandatory verification platform, as future changes to API specifications, commercial governance, platform upgrades, outages, or shifts in national digital identity policy may introduce long-term regulatory and operational risks. TM Tech proposes that the Mandatory Standard require MFA-secured identity authentication, while allowing flexibility if national specifications evolve. • TM Tech requests a predictable regulatory update framework, instead of requirements that may change “from time to time,” and proposes structured processes involving industry consultation, written notification, and reasonable implementation lead time. • TM Tech believes these considerations will strengthen clarity, practicality and long-term resilience of the Mandatory Standards, ensuring consistent implementation across Service Providers and supporting the integrity of the prepaid Registration ecosystem.
Tune Talk	<ul style="list-style-type: none"> • Tune Talk does not support the requirement for thumbprint readers, as the hardware imposes a high cost and operational burden, particularly for smaller Service Providers and authorised Dealer. Tune Talk suggests allowing alternative verification methods such as facial recognition or MyDigital ID authentication, which are more scalable and cost-effective. • Tune Talk reiterates its proposal for facial recognition to be the preferred verification method for MyKAS, MyPR and passport holders, noting that it is more practical and seamlessly integrates with existing digital identity systems. Tune Talk recommends that the Commission recognise facial recognition as an accepted method aligned with the MyDigital ID framework.

Submitting Party	Comments
	<ul style="list-style-type: none"> • Tune Talk does not support the proposed reduction in the data verification requirement. In view of MyDigital ID’s upcoming full integration, including authentication with NRD and future immigration data, manual verification exercises will become redundant. Centralising verification and audit under MyDigital ID also prevent duplication and inconsistent practices across Service Providers. Tune Talk proposes removing the manual data verification exercise, adopting MyDigital ID as the central enforcement and audit platform, and deleting reporting requirements except for Dealer related audits once MyDigital ID is fully implemented. • For Non-Malaysian tourists staying less than three (3) months, Tune Talk indicates that capturing hotel or temporary residential addresses may be redundant, as such details are already collected by the IDM. Verification of these addresses also presents operational challenges. Tune Talk proposes allowing a simple declaration of “place of stay” without requiring physical proof. • Tune Talk recommends a minimum twelve (12) months grace period to ensure smooth implementation of the Mandatory Standards, including system integration, internal testing, Dealer readiness and alignment with external stakeholders.
U Mobile	<ul style="list-style-type: none"> • U Mobile highlights the substantive differences between the proposed Mandatory Standards and the existing Guidelines 2017 and recommends that the Commission provide adequate transition timelines to enable Service Providers to develop the necessary systems, infrastructure and standard operating procedures for full compliance. • U Mobile also proposes that the Commission conduct structured engagement sessions with Service Providers prior to implementation to ensure clarity on regulatory expectations, address operational challenges and align interpretations of the requirements across the industry.

Submitting Party	Comments
XOX	<ul style="list-style-type: none"> • XOX proposes a transition period of twelve (12) to eighteen (18) months prior to full enforcement of the Mandatory Standards for Prepaid, to allow sufficient time for system readiness, process alignment and operational implementation.
YTLC	<ul style="list-style-type: none"> • YTLC proposes that the Mandatory Standards include a contingency requirement for situations where the MyDigital ID platform is unavailable, experiencing system interruptions, or otherwise unable to support customer Registration. • In such circumstances, Service Providers should be allowed to revert to their existing eKYC processes to complete customer onboarding in line with the Registration requirements. This ensures service continuity, prevents delays in activating Prepaid Services, and avoids compliance issues arising from third-party platform downtime.
SP#10	<ul style="list-style-type: none"> • SP#10 supports the proposed requirement.
GSMA	<ul style="list-style-type: none"> • GSMA does not support mandatory prepaid SIM Card Registration. It recommends that the Commission adopt mechanisms that are flexible, proportionate and aligned with local market conditions, supported by a robust customer verification and authentication framework to enable secure access to digital and non-digital services. • GSMA further encourages the Commission to engage closely with industry throughout the development and implementation of the Mandatory Standards. • GSMA highlights the importance of balancing national security objectives with the protection of citizens' rights when imposing SIM Card Registration requirements. • GSMA requests that clear and certain Registration requirements be provided ahead of implementation.

Submitting Party	Comments
	<ul style="list-style-type: none"> GSMA encourages the Commission to allow or promote electronic record keeping and streamlined Registration processes that minimise administrative burden. GSMA proposes that mobile operators be supported in SIM Card Registration exercises, including through coordinated communication efforts and consideration of operational costs.
Public	<ul style="list-style-type: none"> Ezzam Mohlarom expresses support for measures aimed at reducing scam related and syndicate-driven content circulating on social media platforms. Mohammad Firas Faiq indicates that the current lifecycle and authentication methods for mobile numbers pose critical security risks, particularly identity theft through recycled numbers. The existing quarantine period is insufficient, as it enables new owners to exploit SMS based OTP systems and gain unauthorized access to banking, social, and e-commerce accounts via password reset functions. To mitigate these vulnerabilities, he proposes two (2) proposals. First, mobile numbers should be treated as permanent digital identity credentials linked to MyDigital ID, with recycling permitted only upon verified consent from the original owner. Second, an automated, MCMC enforced de-linking mechanism should notify major digital Service Provider to reset or unlink authentication details whenever a number is terminated or transferred, ensuring the recycled number is fully sanitised before reuse.

Table 30: Responses on additional views sought

Summary of Feedback

2.20.1 The Commission notes that thirteen (13) out of fifteen (15) respondents submitted additional feedback for this question. These respondents comprised of CelcomDigi, Maxis, redONE, Redtone, TM Tech, Tune Talk, U Mobile, XOX, YTLC, SP#10, GSMA, Ezzam Mohlarom and Mohammad

Firas Faiq. Two (2) respondents, namely Heng Tun Kiat and JL Wong did not submit feedback for this question.

- 2.20.2 Several respondents, including CelcomDigi, TM Tech, Tune Talk, U Mobile, XOX and YTLC, raised matters relating to implementation timelines, system readiness and operational impact. These respondents generally highlighted the substantial changes introduced under the proposed Mandatory Standards and emphasised the need for a reasonable transition period ranging between twelve (12) and eighteen (18) months to support procurement of devices (such as biometric scanners and passport readers), system development, integration workstreams, internal testing, and Dealer training activities. They further noted that insufficient lead time may result in inconsistent adoption, operational disruption and misalignment across the industry.
- 2.20.3 A number of respondents commented on biometric verification requirements. Several respondents including CelcomDigi and Tune Talk highlighted the high cost and operational burden associated with fingerprint scanners, particularly for extensive Dealer networks and smaller Service Providers. Tune Talk proposed that facial recognition be recognised as an acceptable biometric method across MyKAS, MyPR and passport holders, aligned with the MyDigital ID framework. TM Tech also highlighted the need for flexibility in verification methods, proposing MFA-secured approaches that remain resilient against changes in national digital identity specifications.
- 2.20.4 Respondents also provided observations on data verification requirements. Tune Talk and another Service Provider expressed their views that data verification requirement should be eliminated once MyDigital ID is fully integrated with national databases, given that the authentication layer provides verified data.
- 2.20.5 TM Tech proposed that the Commission adopt a structured regulatory update framework with clear timelines and formal industry consultation to provide predictability and support long term planning. YTLC recommended that the Mandatory Standards include contingency requirements for scenarios where the MyDigital ID platform is unavailable to ensure continuity of Registration processes. U Mobile and XOX emphasised the need for clarity on system requirements, enforcement expectations and alignment of verification processes across Service Providers.

- 2.20.6 Other respondents raised additional considerations related to enforcement, fraud mitigation and industry alignment. Maxis highlighted that SIM Card limit controls alone may not sufficiently deter fraudulent activities and emphasised the need for measures addressing Dealer misconduct, digital KYC mechanisms and platform level vulnerabilities. GSMA stated its concerns regarding the proposed Mandatory Standard of prepaid SIM Registration and encouraged the Commission to adopt proportionate, flexible and risk based approaches aligned with broader security and rights protection principles. Ezzam Mohlarom expressed general support for measures aimed at strengthening efforts against scam related and syndicate-driven activities.
- 2.20.7 One (1) respondent, Mohammad Firas Faiq, highlighted broader systemic risks associated with mobile number lifecycle management and authentication practices. He noted security risks from recycled mobile numbers and proposed treating numbers as permanent digital identities linked to MyDigital ID, with recycling allowed only upon verified consent. He also recommended an automated de-linking system to notify Service Provider when numbers are terminated or transferred, phasing out SMS based OTP for high risk transactions in favour of biometric verification, and improving account recovery processes.

Commission's View

- 2.20.8 The Commission notes the additional submissions highlighting implementation complexity, cost implications, infrastructure readiness and training requirements, including requests for extended transition or grace periods. These considerations have been carefully assessed in light of the scale of change introduced under the Mandatory Standards and the need to balance operational feasibility with timely risk mitigation.

Implementation Period

- 2.20.9 As set out elsewhere in this report, the Commission has provided a defined transition period prior to full enforcement to allow Service Providers and Dealers to complete procurement, system integration, testing, deployment and training activities. The Commission considers this transition period of six (6) months to be proportionate and sufficient, taking into account enforcement intelligence, fraud trends and the long-standing vulnerabilities associated with prepaid SIM Registration.

Regulatory Engagement and Consultation

- 2.20.10 The Commission notes submissions requesting structured consultation or advance notice prior to future regulatory refinements. In this regard, the Commission clarifies that the development of the proposed Mandatory Standards has been informed by extensive industry engagements, including task force deliberations, bilateral sessions, technical discussions and public consultation processes conducted over an extended period.
- 2.20.11 While the Commission remains committed to continued stakeholder engagement, decisive and timely action is necessary in response to emerging risks, enforcement findings and national security considerations. Procedural requirements that delay or hinder such action would undermine the Commission's mandate to safeguard the integrity of the prepaid ecosystem.

SIM Limitations and Fraud Prevention

- 2.20.12 The Commission notes views suggesting that SIM based controls may not address all fraud vectors and that fraudulent activities may evolve toward OTT platforms, foreign SIM usage, network-layer abuse or device compromise. The Commission acknowledges that fraud is adaptive and multi-faceted.
- 2.20.13 However, enforcement data and intelligence consistently demonstrate that a significant proportion of telecommunications enabled fraud continues to originate from improperly registered prepaid SIM Cards, particularly involving Non-Malaysian Individuals, and often facilitated through weak Dealer controls, identity misuse and Registration circumvention. Strengthening prepaid Registration integrity, therefore, remains a necessary and proportionate regulatory intervention within the Commission's statutory remit.
- 2.20.14 Measures under the Mandatory Standards are not intended to address all forms of fraud, but to eliminate critical vulnerabilities within the communication services. These measures support broader enforcement actions, inter-agency coordination and future policy initiatives addressing other forms of fraud.
- 2.20.15 The Commission concurs that Dealer governance and verification quality are key determinants of Registration integrity. Accordingly, the Mandatory Standards through the Common Code of Conduct introduce strengthened Dealer onboarding, traceability, audit, Suspension and enforcement

mechanisms to directly address misconduct, negligence and non-compliance at the Dealer level. The Commission remains of the view that robust Dealer accountability and consistent verification standards are essential to preventing fraudulent Registration.

2.20.16 Additionally, the Commission clarifies that SIM Card limits apply prospectively to the Registration of new prepaid SIMs and are not applied retrospectively to existing registered numbers. Accordingly, where an End-user holds multiple prepaid numbers registered prior to the implementation of the Mandatory Standards, the SIM limit does not restrict the End-user's right to port out any such numbers under the existing Mobile Number Portability ("MNP") framework. MNP rights continue to apply to each registered number in accordance with established MNP rules, independent of SIM limits.

2.20.17 However, the SIM limit may affect the successful porting-in of a prepaid number where the end-user has exceeded the number of SIM limit.

Integration of MyKAS, MyPR and Passport Holders into MyDigital ID

2.20.18 The Commission notes proposals to recognise facial recognition as a verification method for MyKAS, MyPR and passport holders, aligned with the MyDigital ID framework. At this stage, such alignment is not feasible as MyDigital ID verification for Non-Malaysian has yet to be operationalised.

2.20.19 The Commission will continue to assess the suitability of alternative biometric mechanisms, including facial recognition, once the relevant national systems, governance frameworks and authoritative data sources are in place. Until such readiness is established, the prescribed verification mechanisms under the Mandatory Standards remain necessary to ensure consistency, assurance and enforceability.

Data Verification, Reporting and Audit Requirements

2.20.20 The Commission is of the view that the data verification exercise and reporting requirements under the Mandatory Standards are not rendered redundant by the phased implementation of MyDigital ID. While MyDigital ID enhances identity authentication, it does not replace the need for independent regulatory oversight, auditability and verification of compliance with Registration obligations.

2.20.21 Data verification exercises and reporting requirements serve distinct regulatory purposes, including the detection of non-compliance and the support of enforcement actions.

MyDigital ID Fallback Mechanism and Enforcement Responsibility

2.20.22 The Commission notes proposals to introduce contingency requirements allowing reversion to alternative eKYC mechanisms in the event of MyDigital ID unavailability. The Commission does not agree with this approach.

2.20.23 Allowing fallback verification pathways would undermine the integrity, consistency and assurance objectives of the Mandatory Standards and create enforcement ambiguity. Service Providers are therefore required to align operational readiness with prescribed verification requirements and may not rely on system contingency as a basis for deviation.

2.20.24 The Commission notes submissions proposing that enforcement reliance should rest primarily with MyDigital ID where identity authentication is performed through national platforms.

2.20.25 The Commission clarifies that while MyDigital ID serves as one of the identity authentication mechanisms, it does not replace Service Providers' statutory obligations under the CMA 1998 to ensure compliant Registration, record keeping, traceability and auditability.

2.20.26 Regulatory accountability for prepaid Registration therefore remains with Service Providers. Enforcement action will continue to be directed at regulated entities, without prejudice to lawful inter-agency cooperation.

Address Capturing for Non-Malaysian (Tourists)

2.20.27 The Commission notes feedback that capturing hotel or temporary residential addresses for Non-Malaysian (tourists) may present operational challenges.

2.20.28 As clarified in paragraph 2.4.34 of this Public Inquiry Report, Service Providers or the Dealer shall record hotel or temporary residential address information in accordance with paragraph 7.8 of the Mandatory Standards.

Mandatory Standards for the Registration of End-Users of Prepaid Public Cellular Services

- 2.20.29 The Commission notes views referencing international practices that do not mandate prepaid SIM Card Registration. In this regard, the Commission reiterates that Malaysia has long adopted a regulatory framework for prepaid Registration, taking into account enforcement experience, consumer protection needs and public safety considerations.
- 2.20.30 Since 2006, the Commission has progressively introduced regulatory measures to govern prepaid SIM Card Registration, including the Guidelines on Registration of End-Users of Prepaid Public Cellular Services issued in 2017. In light of evolving fraud risks, technological developments and inconsistent compliance outcomes, the Commission is now proposing to replace the Guidelines 2017 with a stricter regulatory instrument i.e. Mandatory Standards, pursuant to its statutory powers under the CMA 1998. This transition is intended to strengthen accountability, consistency and enforceability across the prepaid Registration ecosystem.

Proposals Outside the Scope of Mandatory Standards

- 2.20.31 The Commission acknowledges submissions relating to number recycling, OTP based authentication, coordination with downstream Service Providers, and broader use of digital identity beyond telecommunications sectors. These proposals raise important policy considerations but fall outside the scope of the Mandatory Standards, which focus on prepaid SIM Registration. These include proposals to:
- a) reform mobile number recycling practices to mitigate risks associated with identity takeover and unauthorised access;
 - b) phase out or reduce reliance on SMS based OTP mechanisms for financial and digital services in favour of biometric or alternative authentication methods;
 - c) introduce automated de-linking or notification mechanisms between telecommunications networks and third party digital Service Provider upon number Termination or reassignment; and
 - d) expand the functional use of MyDigital ID for account recovery, downstream service authentication, mobile number lifecycle management and cross sector digital identity governance.

2.20.32 Notwithstanding the objectives of these proposals, the Commission agrees that they represent some measures from policy, technical, and governance perspectives; however, these proposals fall outside the scope of the Mandatory Standards. The Mandatory Standards are confined to regulating prepaid SIM Card Registration, activation controls and Dealer governance within the telecommunications sector. Matters relating to numbering lifecycle management, financial authentication frameworks and cross-sector digital identity usage are addressed through separate regulatory instruments, agencies and inter-agency policy processes.

3. The Way Forward

- 3.1 The Commission has carefully considered all the comments made by respondents. It also notes that there may be other views that are not sufficiently reflected in this report, but assures that they have been taken into account in the Commission's final deliberation.
- 3.2 Additionally, the Mandatory Standards are intended to fulfil the following key areas:
- a) To strengthen the prepaid Registration framework by building upon the foundation established under the Guidelines 2017. The Guidelines 2017 introduced essential requirements for the Service Providers and Dealers, forming the basis of current Registration practices. The Mandatory Standards now advance these measures by imposing enhanced obligations to ensure stricter compliance, accountability and security;
 - b) To safeguard consumer interests by addressing critical risks such as SIM Card related fraud, identity misuse, and inconsistent Registration practices. These Standards introduce robust controls and verification mechanisms to protect consumers and uphold the integrity of the prepaid ecosystem;
 - c) To establish a structured and effective mechanism for addressing End-user complaints, ensuring timely resolution and improving transparency in the handling of Dealers on Registration related issues; and
 - d) To promote the sustainable development of Prepaid Registration practices through standards that are future proof and technology neutral, enabling adaptability to evolving technologies and market dynamics.
- 3.3 The Commission is of the view that national policy should serve as the foundation for evaluating all feedback and information received throughout the Public Inquiry process. In particular, the obligations set out under the Mandatory Standards aligned with the national objective to establish Malaysia as a major global centre and hub for communications and multimedia information and content services. This alignment is also critical to promote a high level of consumer confidence in service delivery from the industry.