

Member of the public response

**Date:** Friday, August 9, 2013 10:11 AM

**Subject:** E-Mail Mobility & Cell Phone Unlocking

I read the article in today's Bernews with interest & wanted to register my support for some of the RAB proposed positions. I expected to find a simple 'radio button' yes or no facility somewhere, but there does not appear to be any. Surely a such a facility would engender greater response & those with broader views can also write as prescribed.

August 11, 2013

Philip Micallef Chief Executive Regulatory Authority  
3rd Floor Cumberland House 1 Victoria St. Hamilton HM 11 - Bermuda

RE: Responses to Consultation Email Portability C13/1000

Dear Mr. Micallef,

I am an information security professional with over 15 years of experience security Internet email for various organizations. It is refreshing to see the Regulatory Authority recognizing the importance of email addresses in the lives of people throughout Bermuda. Thank you for the opportunity to provide this feedback regarding email portability.

Without doubt, I believe many ISPs rely on customers becoming dependent on the email address they provide to customers. This dependence can be leveraged by the ISP to lock customers into a service that they do not want the hassle or expense of changing email addresses. Frankly, this is part laziness and lack of awareness on behalf of the customer. There is no technical reason customers need to use the the email address provided by the ISP in the first place. The very nature of the Internet allows customers to use services (email, web hosting or any other applications) provided by anyone around the world. In fact, customers can register their own Internet domain and use this for email hosting or forwarding and never have to worry about changing ISPs or services being discontinued. I would recommend any decision by the Regulatory Authority include advice that reminds or recommends customers of the ability to use alternate email services (many of them free) not tied to the ISP or to register their own Internet domain before they become reliant on an ISP supplied address.

I agree individuals and businesses depend heavily on email as a form of communication, however, I disagree that this forms an integral part of one's identity. One only has to look into the rampant issues of unwanted Internet email (i.e. spam) and fraud (i.e. phishing) to realize that email is not inherently a secure form of communication. It is very easy for fraudsters to impersonate others by email and "spoof" one's email address. As a result, email addresses are often thrown away when they receive too much spam or are used by spammers.

A common technique is to register one main and many auxiliary email addresses, which will forward all mail to the main address, i.e., the auxiliaries are used as aliases of the main address. The advantage of this approach is that the user can easily detect which auxiliary email is 'leaking' with spam and block or dispose it. It requires additional time to set up forwarding. However, this method allows storage and access of all emails from a single main account, although to manage forwarding the user has to

remember the password for each alias.

**“3.1 Initial period transfer of emails”**. Accepting Internet email and forwarding to another email address consumes Internet bandwidth that is not free for the ISP. In fact, this consumes twice the amount of bandwidth because the message must be forwarded to another service. This would be a nice service, however, I do not believe it should be free. Perhaps the regulatory authority should consider mandating that ISPs provide this service and set a maximum fee and minimum amount of time they must offer the service.

**“3.2 Notification during the Initial Period”**. If a notification email is used, I do not recommend it contain the new email address of the recipient unless the customer agrees. Automatically generated emails can be abused to further propagate spam. This could cause the ISP to be blacklisted and impact the delivery of ALL their Internet email.

**“3.4 Re-allocation of email address upon termination”**. I strongly support the requirement that previously used email addresses should not be re-used for a period of 12 months. Allowing the address to be re-used makes it easier for others to impersonate the previous owner and perpetrate fraud. In fact, if the email address relates to the name of a business I would recommend the period be extended to 36 months.