

Mr. Bruce Wallace
Director, Security and Privacy Policy
Digital Policy Branch/Spectrum, Information Technologies and Telecommunications
Industry Canada
Bruce.Wallace@ic.gc.ca

January 31, 2013

Mr. Wallace,

We understand Industry Canada has requested comments on the draft Electronic Commerce Protection Regulations¹ published in The Canada Gazette Vol. 147, No. 1 — January 5, 2013.

We ask you to consider the following response from the Messaging, Malware and Mobile Anti-Abuse Working Group in your recommendations and revisions. You have our permission to use the following material publicly to advance your work.

The Messaging, Malware and Mobile Anti-Abuse Working Group (hereafter “M³AAWG”) is an international non-profit, industry-led organization founded to fight online abuse such as botnets, phishing, fraud, spam, viruses and denial-of-service attacks that can cause great harm to both individuals and national economies. M³AAWG draws technical experts, researchers and policy specialists from a broad base of Internet service providers and network operators representing over one billion mailboxes, and from key technology providers, academia and volume sender organizations. The multi-disciplinary approach at M³AAWG includes education, advice on public policy and legislation, development of industry best practices, guidance in the development of industry standards, and the facilitation of global collaboration.

We appreciate the opportunity to provide these comments from the messaging industry’s perspective.

The M³AAWG Public Policy Committee and the Board of Directors have reviewed the draft regulations and agree with them as they stand. We find these regulations to be helpful and useful in clarifying the various aspects of the Canadian Anti-Spam Law (CASL).

We strongly encourage the Government of Canada, as we did in our original letter of support of the law, to the Right Honourable Stephen Harper, Prime Minister of Canada, (MAAWG Letter Regarding Canadian Fighting Internet and Wireless Spam Act (FISA) dated September 30, 2010²) to pass the law into force as quickly as possible.

Yours truly,
s/s
Jerry Upton
Executive Director, M³AAWG
jerry.upton@m3aawg.org

¹ <http://www.gazette.gc.ca/rp-pr/p1/2013/2013-01-05/html/reg1-eng.html>

² http://www.maawg.org/sites/maawg/files/news/MAAWG_Canada_FISA_C28_Support%20Letter_2010-09.pdf