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WHITE PAPER

NAVIGATING MICROSOFT SEND LIMITS: CHALLENGES AND SOLUTIONS FOR US FUSION CENTERS

Microsoft will impose a new external recipient send limit starting July 2025. This change will impact your fusion center if it relies on Microsoft365 as the primary means of communicating with stakeholders.

This paper describes the problem in detail and explores possible alternatives.



Executive Summary

Microsoft recently announced some BIG changes to their Exchange Online service. One significant change is the enforcement of a new external recipient rate limit of 2,000 recipients within a 24-hour period.

This change is likely to impact your fusion center if it uses Microsoft365 as its primary means of communicating with stakeholders, as most fusion centers send out *many more* emails than 2,000 in a typical day.

This limit goes into effect starting July 2025 so fusion center directors need to have a *plan in place* well before the deadline to ensure their stakeholder communications are not disrupted.

Microsoft Exchange is cracking down on spam with new bulk sending limits

News By Lewis Maddison published April 16, 2024

The tech giant plans to limit bulk emails

Microsoft to tackle spam by restricting Exchange Online bulk email

Need to send to more than 2,000 external recipients in 24 hours? Time to start looking for an alternative

 [Richard Speed](#)

Tue 16 Apr 2024 // 16:00 UTC

For the first time, Microsoft will apply daily restrictions to Exchange Online in an effort to staunch the flow of spam from the service.

Starting from January 1, 2025, Exchange Online will begin **enforcing** an External Recipient Rate (ERR) limit of 2,000 recipients in 24 hours for cloud-hosted mailboxes of all newly created tenants. Between July and December 2025, Microsoft will start applying the limit to the cloud-hosted mailboxes of existing tenants.

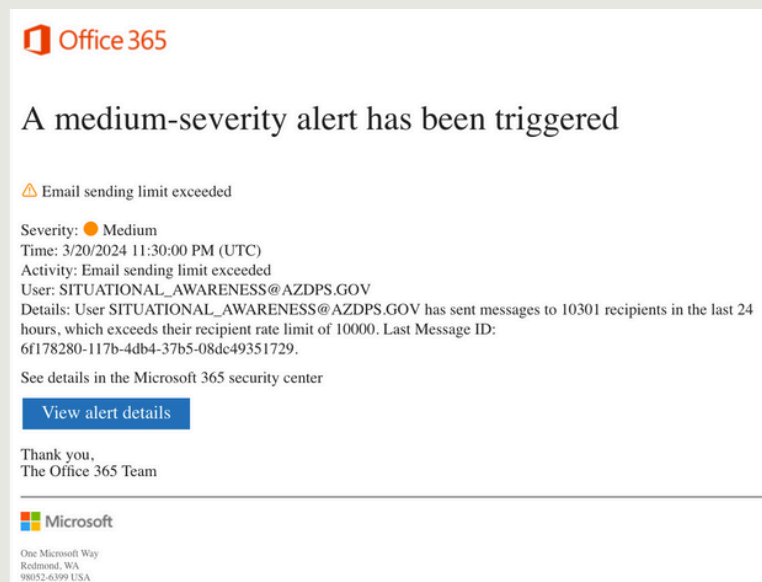
Microsoft Bolsters Exchange Online Security with New External Recipient Rate Limit Feature

Blog / Microsoft 365 / Exchange Online / [Post](#)

Problem Statement: Send limits are a looming disaster for fusion centers

Microsoft is setting a new limit on the amount of bulk emails users can send in a day with Exchange Online. From January 2025 (for new users) and July 2025 (for all users) the email provider will allow no more than 2,000 **external** recipients of bulk emails per day, ostensibly to prevent users from “abusing” the service, which wasn't originally designed for sending emails in bulk.

In a [blog post](#) detailing the changes, Microsoft states that there is currently no limit on bulk sending in Exchange Online to external recipients. However this is *not* the whole story. Microsoft currently imposes a **soft limit** of 10,000 messages in a day, at which point an administrator has to log in and perform a reset (basically stating “we are not compromised by spammers”) after which sending is restored. Many fusion centers hit this limit regularly already.



The image shows a screenshot of an Office 365 security alert email. At the top left is the Office 365 logo. The main heading reads "A medium-severity alert has been triggered". Below this is a warning icon and the text "Email sending limit exceeded". The severity is listed as "Medium". The time is "3/20/2024 11:30:00 PM (UTC)". The activity is "Email sending limit exceeded". The user is "SITUATIONAL_AWARENESS@AZDPS.GOV". The details state: "User SITUATIONAL_AWARENESS@AZDPS.GOV has sent messages to 10301 recipients in the last 24 hours, which exceeds their recipient rate limit of 10000. Last Message ID: 6f178280-117b-4db4-37b5-08dc49351729." There is a link to "View alert details" and a signature from "The Office 365 Team". At the bottom is the Microsoft logo and address: "One Microsoft Way, Redmond, WA 98052-6399 USA".

With the introduction of an External Recipient Rate (ERR), however, they will impose a **hard limit**, which will **prevent messages from being delivered** once the threshold is met.

Microsoft also notes that the total Recipient Rate limit will remain at 10,000 per day, adding that, once the ERR limit takes effect, "if you send to less than 2,000 external recipients in a 24 hour period, you will still be able to send to 10,000 total recipients." Obviously, this distinction does **not** help fusion centers very much since nearly ALL of a fusion center's stakeholders are external, not internal. You *can* send out 10,000 messages, but *only if* 8,000 of them are internal.

"Exchange Online does not support bulk or high-volume transactional email," Microsoft said. "We have not enforced limiting of bulk email until now, but we plan on doing so with the introduction of an External Recipient Rate limit. The ERR limit is being introduced to help reduce unfair usage and abuse of Exchange Online resources."

Problem Statement (continued)

According to Microsoft's [documentation](#), the recipient rate limit applies per user, and the company advises customers who need to send "legitimate bulk commercial email," such as newsletters, to use a third-party tool, or switch to using Azure Communications Services for Email, which the company says "is designed specifically for high volume email sent to recipients external to your tenant."

There will be two phases to the change: phase 1 will see the ERR limit applied to cloud-hosted mailboxes of all newly created tenants, starting from January 2025. Phase 2 will take place between July and December that same year, where the **ERR limit will be applied to existing tenants.**

Once your center's stakeholder mailbox has sent 10,000 messages in a 24 hour period, it will be prevented from sending any more messages for 24 hours-- even if you are trying to send out a critical **officer safety notification**. This could obviously be a disaster as it directly conflicts with the mission of communicating regularly with stakeholders!

One workaround that *might* work, at least in the short term, is setting up multiple mailboxes. But this "solution" comes with its own set of new problems too. For instance, stakeholders are expecting messages from a specific address and messages from other senders may end up in a spam folder. Juggling multiple mailboxes is also more burden on the analysts. It's also likely that Microsoft will notice this behavior and figure out a way to stop it, since thousands of customers will likely try it.



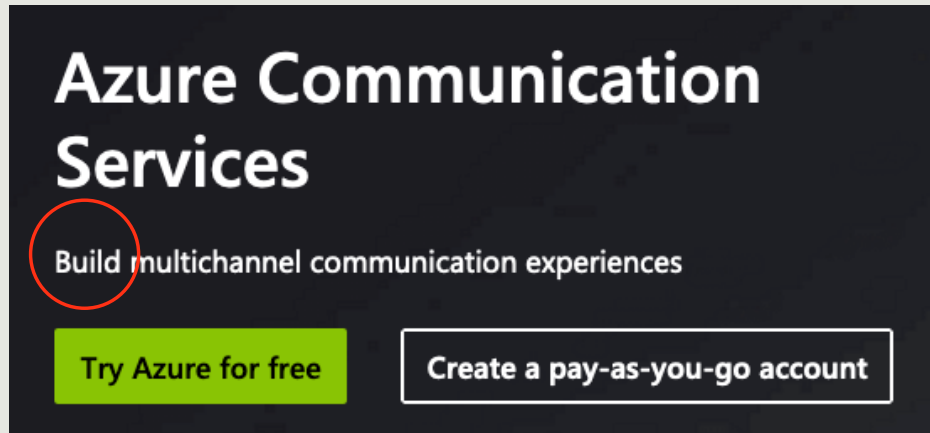
Don't assume this issue doesn't apply to you if your fusion center uses Gmail rather than Microsoft. Google recently made changes to *their* bulk sending policies, setting a limit of 4,000 per day for organizations sending bulk emails, again with the purported goal of preventing spam.



This trend is likely to get worse over time for organizations with a legitimate reason to send messages in bulk.

Alternative 1: Azure Communication Services for Email

One of the “solutions” that Microsoft offers to help organizations affected by the external recipient rate is a service called Azure Communication Services for Email.



Diving into the product page at <https://azure.microsoft.com/en-us/products/communication-services/#overview> quickly reveals the limitation of this solution-- it is a building block, not a product. Microsoft uses the headline “Production-ready Email APIs”. An API is an application programming interface, which means you have to build a software solution around it to use it.

Unless your fusion center wants to build a **custom email solution** from scratch, and have it done by July 2025, this is not a viable option.

The bottom line

Azure Communication Services is a building block intended for use by programmers, not a packaged solution suitable for end users.

FAIL

Alternative 2: High Volume Email (HVE) for Microsoft 365

In April 2024, Microsoft announced the public preview of High Volume Email (HVE) for Microsoft 365. HVE is a new service designed primarily for line of business applications and other high-volume SMTP Auth submissions that enables customers to send internal messages beyond the current limits of Exchange Online. Customers using on-premises servers in an Exchange hybrid configuration to send a large volume of internal messages can use this service instead and decommission their on-premises servers.

The goals with HVE are to:

- Enable customers to send higher volumes of email than a typical user mailbox to recipients who are predominately internal without a recipient rate limit.
- Limit the volume to external recipients, as [Azure Communication Services](#) provides the solution for high volumes of external email.
- Allow admins to set their own limits on a per-account basis and provide them with a consumption-based billing model, usage metrics and tracking.

	MICROSOFT 365 BUSINESS BASIC AND STANDARD	MICROSOFT 365 BUSINESS PREMIUM	MICROSOFT 365 ENTERPRISE E3/E5	OFFICE 365 ENTERPRISE E1	OFFICE 365 ENTERPRISE E3/E5	OFFICE 365 ENTERPRISE F3	HIGH VOLUME EMAIL (PUBLIC PREVIEW)
RECIPIENT RATE LIMIT	10,000 recipients per day	10,000 recipients per day	10,000 recipients per day	10,000 recipients per day	10,000 recipients per day	10,000 recipients per day	100,000 recipients per day (per tenant)
MESSAGE RATE LIMIT	30 messages per minute	30 messages per minute	30 messages per minute	30 messages per minute	30 messages per minute	30 messages per minute	No limit

The bottom line

Although it sounds promising, Microsoft HVE is *not* a solution for fusion centers, as it's focus is on internal recipients, not external.

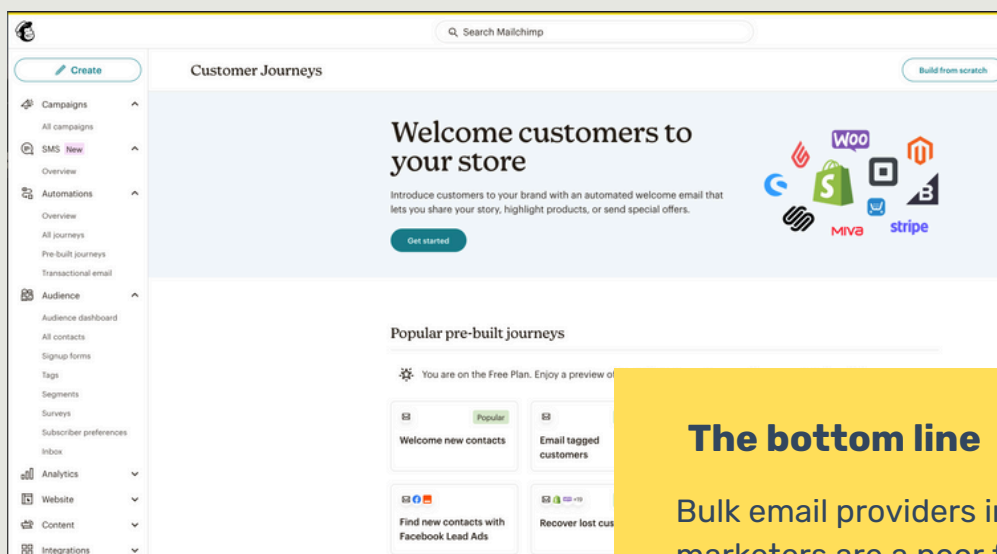
FAIL

Alternative 3: MailChimp, Constant Contact, et. al.

There are dozens of products on the market designed to allow marketers to send bulk emails such as newsletters and announcements. These products include Constant Contact, MailChimp, AWeber, Drip, and dozens more.

The challenges with products like these are many. First, they are designed and optimized for **marketers**, not intelligence agencies, and their target market influences their feature set. They are encumbered with features like “customer journeys”, Facebook leads, and abandoned shopping cart recovery which is not relevant to fusion centers. Their email templates are designed to “stand out” with overly complicated designs not well suited to intelligence products.

These companies are **very** concerned with making sure that **YOU** are not a spammer. They track your bounce rate and will prevent you from sending messages if they deem you to be in violation of any of their terms of service, which are opaque at best. Finally, it is highly unlikely that any of these commercial services would pass even a forgiving security audit; it’s simply not their focus. Their focus is on making money by charging customers for every email they send. The rate at which the typical fusion center communicates makes these solutions prohibitively expensive.



The bottom line

Bulk email providers intended for marketers are a poor fit for fusion centers, although they do eliminate the send limits that Microsoft imposes.

MAYBE

Alternative 4: Hoozin INSPIRE

Hoozin INSPIRE (Intelligence Sharing Portal for Information, Research, and Exchange) is the only product on the market which is specifically designed for use by fusion centers. INSPIRE modernizes and streamlines the way the fusion centers share sensitive-but-not-classified information with federal, state, local, and private sector partners. It combines the best of portal and email with the following goals:

- **Easier for Fusion Center staff**-- simply post products to the appropriate community without worrying about which stakeholders it should be addressed to; the portal takes care of delivery automatically.
- The portal makes it **easier for the Stakeholders** -- reduce the clutter of their incoming information by automatically sending out a single consolidated email per day, which includes just the right information for each stakeholder. No more overwhelmed inboxes, no more missed warnings, no more searching through hundreds of messages.



Supporting The Mission

Fusion Centers have as their **primary mission** to publish, share, and disseminate criminal information products (i.e., federally generated alerts, warnings, pass-through bulletins, etc.) out to community stakeholders.

This is typically accomplished by sending out hundreds (perhaps thousands) of emails to individual stakeholders on a regular (constant) basis.

But email was never *ideal* for this, and now Microsoft is making it *impossible*.



Better Than Email

The use of email comes with several limitations, one of which is the necessity to address every bulletin and intelligence product to the appropriate distribution group each time, requiring effective management of these groups.

The Fusion Center Intelligence Portal offers an *innovative alternative* that not only overcomes these limitations but also **revitalizes** the potential of email through the implementation of a more focused approach-- the daily intelligence briefing.



"Daily Intelligence Briefing" Email

The portal consolidates all the postings from the previous 24 hours and emails each stakeholder a customized briefing showing the posts for which they are subscribed and authorized, which they have not already seen by logging into the portal.

This approach will reduce the number of messages sent by a factor of five times or more, making it much more likely that your content will be consumed by the right people at the right time.

Alternative 4: Hoozin INSPIRE (continued)



Works the way users expect

The Portal offers a user-friendly interface similar to Facebook and LinkedIn with the most recent content at the top.

- Content flows by in a “stream” just as it does in real life, with the most recent content at the top of the stream.
- Content is organized into "communities of interest" to which stakeholders can subscribe and unsubscribe as their interests dictate.
- Every time a new post is made it goes to the top and older content moves down.
- Communities can be designated as LEO-only, and the system is CJIS compliant.



Communities of Interest

The portal is organized by topic areas such as Crime Bulletins, Cyber, Elections, Critical Infrastructure, etc. Communities can be set to LEO.

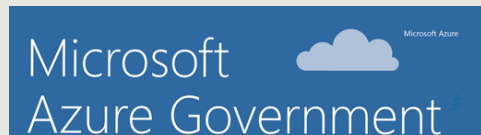
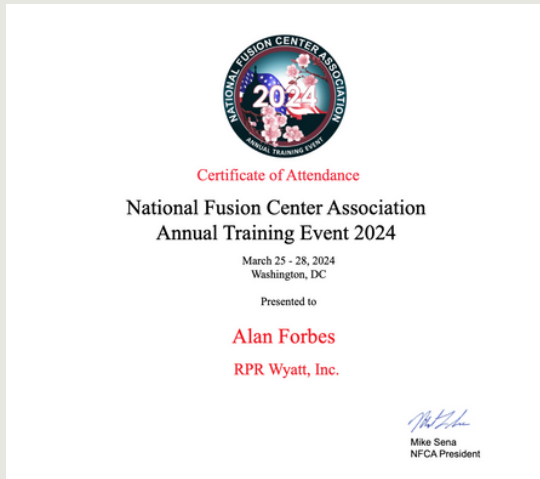
The bottom line

Hoozin INSPIRE intel portal is the only stakeholder communication solution designed specifically for fusion centers and imposes no send limits.

PASS

References

Hoozin INSPIRE is used by SIAC, MN BCA, and PACIC. It recently obtained an "Authorization to Operate" from the state of Oklahoma. RPR provides email support for AZ DPS, including ACTIC.



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