



ACE Insurance Limited

**RESPONSE TO PUBLIC CONSULTATION ON PROPOSED BUSINESS
OPERATION OF THE DO NOT CALL REGISTRY ISSUED ON 15 MAY 2013**

SUBMITTED BY:

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INTRODUCTION

We refer to the public consultation paper issued by the Personal Data Protection Commission (Commission) on 15 May 2013 relating to the Proposed Business Operation of the Do Not Call Registry.

We have enclosed our comments to the consultation paper in this document, and thank you for the opportunity to share our feedback.

In general, we acknowledge and support the Commission's proposal relating to the operation of the Do Not Call Registry set out in the Consultation Paper.

COMMENTS

1. Free Credits

The Commission in section 4.15 of the consultation paper stated that 350 free credits will be allocated to the main account annually. These free credits are valid for 1 year with effect from the date the main account is activated and any unused free credits cannot be brought forward to the following year.

Comment:

From our reading of the proposal, it appears that the free credits are valid for 1 year and the reference to "brought forward to the following year" does not mean calendar year. We propose the Commission provide additional clarity on this, preferably with illustration how it works.

2. Rights and Functions of the main and sub-account holder

The Commission has stated at section 4.16 of the consultation paper that the main account is the overall administrator for all sub-accounts and sub-account holders are not allowed to perform account administration tasks like:

- a) Create sub-accounts
- b) Reset password for main and sub-accounts
- c) Allocate and distribute credits among main and sub-accounts
- d) Terminate sub-accounts
- e) Update contact person details

Comment:

We take the view that the Commission should allow the organisation the flexibility of assigning different access right and function to the different sub-account holders to meet the various business needs.

3. Rates for the Valid Telephone Numbers

Section 6.6 of the consultation paper stipulated the proposed rates applicable for the 2 payment methods.

Comment:

We propose the Commission reduce the rates preferably by half on the each valid telephone number submitted for checking with the DNC registry.

Alternatively, the Commission can consider a 3rd payment method where the organisation can pay a monthly subscription for unlimited telephone numbers.

Depending on business needs, the organisation can choose the type of payment method that is most cost effective and efficient to the business.

4. Modes of payment

The mode of payment stipulated in section 6.7 of the consultation paper is online via major credit cards or Internet Direct Debit.

Comment:

We seek to clarify with the Commission if major credit cards include American Express Corporate Card. If not, we sincerely hope the Commission to consider extending credit card payment to include American Express Corporate Card as we believe it would nonetheless benefit those organisations that hold American Express Corporate Card only.

Also, has the Commission consider allowing the organisation to open a corporate account with monthly settlement to ease administration issues.

How long does it take the credit top-up to be credited to the main account after successful payment?

5. Validity period/expiry date of the Results

Section 7.3 of the consultation paper stated that the Results will be valid for a period of time from the date that the Results are returned to the organisation or until a specific expiry date.

Comment:

We noted time is provided in the example cited. We would like to clarify if the time at which the results are released has any implication on the validity period. That is, does it make any difference in the expiry date if the return of the results is before or after 1200hrs?

CONCLUSION

We appreciate your consideration of our comments and look forward to your further clarification.

Should you require additional information, please feel free to contact us at the contact details in the cover page.