

Response to Public Consultation on Proposed Business Operation of the DNC Registry

Contact:

Tan Kah Tian
Vice President, Legal
Millennium & Copthorne International Limited
9 Raffles Place #61-00 Republic Plaza
Singapore 048619
Co. Reg. No. / UEN: 199600354R
D: 6231 4818 E: tankahtian@hongleong.com.sg

Dear Sirs,

Comment on validity period of results checked on Do-Not-Call Registry

A. Introduction

We wish to make one suggestion regarding the validity period of results checked on the Do-Not-Call (DNC) registry (the “**DNC Telephone Checks**”). Currently, as stated on the Public Consultation Paper, such results checked will be valid for 60 days but on or after 01/07/2014, results checked will be valid for 30 days.

B. Summary of Suggestion

We wish to suggest a ‘constant day’ on which the validity of a DNC Telephone Check will expire. We propose that the ‘constant day’ falls on the last day of a relevant month. Please see below for more details and rationale regarding our suggestion.

C. Rationale and Comments

Our suggestion sets out here will allow organisations to manage the performance of DNC Telephone Checks in an easier and more efficient manner. This is especially important for organisations that regularly send specified messages or perform telemarketing activities on an on-going basis. We believe that the suggestion will make conducting DNC Telephone Checks administratively more straight-forward in term of the timing of such checks. This is given that a calendar month can have between 28 and 31 days and therefore, calculating a 60-day or 30-day validity period, as applicable, can be administratively cumbersome.

In order to take into account that organisations may conduct a DNC Telephone Check on any day of a calendar month for a particular activity involving the sending of a specified message, the validity of such a DNC Telephone Check can be as follows:

Before 01/07/2014:

- (1) If the DNC Telephone Check is submitted before the 15th day of a month, the validity period regarding the telephone numbers checked will expire at the end of the following month.
- (2) If the DNC Telephone Check is submitted on or after the 15th day of a month, the validity period regarding the telephone numbers checked will expire at the end of the month following the next month.
- (3) If the DNC telephone Check is submitted between 01/06/2014 and 14/06/2014 (both dates inclusive), the validity period regarding the telephone numbers checked will expire at the end of the same month.
- (4) If the DNC telephone Check is submitted between 15/06/2014 and 30/06/2014 (both dates inclusive), the validity period regarding the telephone numbers checked will expire at the end of the following month.

On and after 01/07/2014 (which will be the norm going forward):

- (1) If the DNC Telephone Check is submitted before the 15th day of a month, the validity period regarding the telephone numbers checked will expire at the end of the same month.
- (2) If the DNC Telephone Check is submitted on or after the 15th day of a month, the validity period regarding the telephone numbers checked will expire at the end of the following month.

D. Conclusion

It is anticipated that with our suggestion sets out here, organisations that regularly send specified messages or perform telemarketing activities on an on-going basis will be able to better manage the timing of conducting DNC Telephone Checks. In most instances, organisations conducting on-going or rolling checks on a monthly basis will be expected to conduct such checks on a fixed day (e.g. 25th day of every month). Separately, in relation to the suggestion set out here, the timeframe of a person registering his/her telephone number on the DNC register can similarly be adjusted in term of its effective day.