

**Comments/Feedback to Personal Data
Protection Commission's ("PDPC") Consult on
Proposed Business Operation of the Do Not
Call Registry**

Contact person: Group Compliance
Email: compliance@phillip.com.sg
DID: 6531-5474

PART III: DNC OPERATION FOR ORGANISATIONS

Questions in relation to the process of account creation:

1. **Question 2: With reference to paragraphs 4.4 to 4.14, do you have any views/comments on the proposed requirements for an organisation to create a main or sub-account?**

Comments / feedback:

- 20 sub-accounts for each main account may not be sufficient for some organisations, as organisations are of different sizes and number of customers would also vary accordingly. Additionally, a limit to the number of sub-account per main account may affect business efficacy.
- Consistent with our proposal to not impose a limit on the number of sub-account, we are of the opinion that charging a fee for each sub-account would add to the cost of doing business.

Conclusion / Proposal, if any:

- We propose that there should be no limit imposed for sub-accounts to a main account
- We propose that one-time fee be applicable only to the main account. For sub-account it should be for free as the implementation of DNC has the resultant effect of adding to business costs.

2. **Question 3: In particular, are 20 sub-accounts sufficient for each main account and do you have any views/comments on the rights and functions of the main and sub-account holder?**

Comments / feedback:

- 20 sub-accounts for each main account may not be sufficient for some organisations, as organisations are of different sizes and number of customers would also vary accordingly. Additionally, a limit to the number of sub-account per main account may affect business efficacy.
- In respect of the rights and functions of the main account and sub-account, we are agreeable with the rights and functions as provided for in paragraph 4.16.

Conclusion / Proposal, if any:

- Nil

- 3. Question 4: With reference to paragraph 4.18, do you have any views/comments for not allowing foreign organisation to register an account with the DNC registry?**

Comments / feedback:

- We agree with the proposal

Conclusion / Proposal, if any:

- Nil

- 4. Question 5: In particular, do you have any views/comments on the proposed methods to check the DNC registry for Singapore registered organisation that outsourced their telemarketing activities to a foreign organisation?**

Comments / feedback:

- As it is likely that a Singapore registered organisation may outsource its telemarketing activities to a foreign organisation, we are agreeable with option (1) in paragraph 4.18.

Conclusion / Proposal, if any:

- The requirement that a the Singapore registered organisation performing the check with the DNC registry and pass the filtered list to the foreign organisation in Option (1) in paragraph 4.18 is preferred as it may be easier to take action on a locally registered organisations in the event of any dispute.

Questions in relation to the methods provided for checking the DNC registry:

- 5. Question 6: With reference to paragraph 5.1, do you have any views/comments on the proposed methods on how to check the DNC registry?**

Comments / feedback:

- Small number look-up and bulk number look-up should be charged with different rate.

Conclusion / Proposal, if any:

- We proposed that there should be no charges for the look-up whether it is bulk number look-up or Small number look-up, as the implementation of the DNC has the resultant effect of adding business costs. Without imposing any charges on the look-up would assist business to reduce business costs

Questions in relation to the payment schemes:

6. **Question 7: With reference to paragraph 6.6, what is the average quantity of Telephone Numbers would your organisation be likely to submit for checks per month and which would be the scheme (pre-paid or pay-per-use) your organisation be most likely to use as the form of purchase?**

Comments / feedback:

- It is difficult to estimate the average quantity of Telephone Numbers that are likely to be submitted at the present moment. Similarly, it is difficult to know which mode of payment is preferred, as the mode of payment is likely to be linked to the average quantity of Telephone Numbers that are likely to be submitted.

Conclusion / Proposal, if any:

- We propose the Commission to offer a special “pre-launch” period, which allows organisations to perform free checks to allow organisations and the Commission to have a better feel of the checking traffic, and consequently the determination of the type of payment mode

7. **Question 8: With reference to paragraph 6.7, do you have any views/comments on the proposed modes of payment?**

Comments / feedback:

- No comment.

Conclusion / Proposal, if any:

- Nil

Questions in relation to the retrieving results:

8. **Question 9: With reference to paragraphs 7.1 to 7.3, do you have any views/comments on the proposed format of the Results and the methods of retrieving the Results?**

Comments / feedback:

- No comments.

Conclusion / Proposal, if any:

- Nil

9. **Question 10: In particular, do you have any views/comments on the type of file (“.CSV”) that is proposed as the format of the Results file?**

Comments / feedback:

- So long as it can be opened using Microsoft excel.

Conclusion / Proposal, if any:

- Nil