

SINGAPORE PRESS HOLDINGS LTD

*Submission to the Personal Data Protection Commission
Singapore
on the Proposed Business Operation Of The Do Not Call
Registry*

5 June 2013

Contact Person:

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05 June 2013

Personal Data Protection Commission Singapore
(via email pdpc_consultation@pdpc.gov.sg)

Dear Sirs

PROPOSED BUSINESS OPERATION OF THE DO NOT CALL REGISTRY

1. In response to the public consultation of the Proposed Business Operation of the Do Not Call Registry (“DNC Registry”) issued by the Personal Data Protection Commission Singapore (“PDPC”) on 15 May 2013, we are pleased to submit our comments.
2. In this response, SPH will suggest some changes to the requirements relating to main and sub-accounts, as well as seek clarifications on certain processes and methods.

Summary of major points

3. SPH suggests that the DNC Registry exercises flexibility in the number of main and sub-accounts. This flexibility will enable organisations to adjust according to their business and operational requirements. An example of flexibility is to allow a sub-account to be converted into a main account. This flexibility should extend to foreign organisations to whom organisations outsource their telemarketing services.
4. SPH feels that the 350 free credits per year should be increased.
5. SPH would like PDPC to clarify whether foreign organisations can send specified messages as they are not allowed to register for an account. If this is not the case, PDPC may wish to clarify this.
6. As regards methods for checking DNC Registry, SPH would like to find out whether bulk uploads can be broken into batches of 10 telephone numbers under the Small Number Lookup method, and whether each of these batches will continue to be considered as Small Number Lookup.
7. Last but not least, SPH wishes to ask for the format of the “.csv” Result file content. This format will enable processing of the Result files.

A. DNC Operation for Individuals – Question 1

Individual's registration and deregistration with the DNC Registry (Question 1)

8. SPH has no comments on this question.

B. DNC Operation for Organisations – Questions 2 to 10

Process of Account Creation (Questions 2 and 3)

9. As organisations vary in sizes and nature of business, SPH feels that there should be some latitude and flexibility in the number of main accounts and sub-accounts.
10. For instance, a listed company may have diversified businesses with many subsidiaries. While SPH understands that each of these subsidiaries may be allowed its own main account and sub-accounts, flexibility should be allowed for the main listed company to hold various main accounts for the subsidiaries if the listed company wants to control and/or centralise the data base of its group of companies.
11. As an organisation expands its operations or businesses, the number of sub-accounts may need to be increased.
12. As such, SPH would advocate that the DNC Registry should (a) increase the number of main accounts and sub-accounts allowed; and (b) allow organisations to apply for increase in these accounts due to business or operational requirements.
13. SPH would like to suggest that the free credits of 350 per year be increased to a higher level, say, 1000 free credits per year.
14. One example of flexibility is to allow for conversion of a sub-account into a main account. This will probably partially alleviate the problem of insufficient main account and sub-accounts.

Process of Account Creation (Question 4)

15. By not allowing the foreign organisations an account registration seems to suggest that they can send specified messages as they have no account to access the list from the DNC Registry. SPH would like PDPC to clarify that.

Process of Account Creation (Question 5)

16. SPH is agreeable to the proposed methods to check the DNC Registry for foreign organisations that provide outsourced telemarketing services. In line with our response to Questions 2 and 3 above, there should also be flexibility in the number of main and sub-accounts for such foreign organisations.

Methods for Checking DNC Registry (Question 6)

17. SPH needs clarification on the cap of 10 telephone numbers at a time for Small Number Lookup. Does that mean an organisation can break down a bulk upload into batches of 10 telephone numbers each time, and each of these batches will still be considered as Small Number Lookups?

Payment Scheme (Questions 7 & 8)

18. On Question 7, SPH is unable at this point in time to provide a useful estimate of the average quantity of Telephone Numbers.
19. SPH has no comments on the modes of payment.

Retrieving Results (Questions 9 & 10)

20. SPH would like to request for the format of the “.csv” Result file content, including information on how validity period of the check can be identified. Knowing such format will facilitate processing of the Result files by SPH’s IT systems.

Conclusion

21. SPH would like to thank PDPC for the opportunity to participate in the public consultation exercise for the Proposed Business Operation of the DNC Registry. We hope PDPC will look into our feedback and the issues raised and address them accordingly.
22. SPH’s inputs are largely commercial and technical in nature, based on our nature and diversity of our businesses and operations.
23. In that connection, suggestions such as giving flexibility to the main and/or sub accounts will indeed give SPH more latitude in tracking the data flow.

This in turn will tighten SPH's control over the data usage to prevent contravention of the laws and regulations. Also, knowing the format of ".csv" Result file content will help our IT Division in designing or re-designing a compatible system which will be more responsive and speedier.

24. Please contact the undersigned (email: waipun@sph.com.sg) if you have any queries or require any clarification.

Yours faithfully

Lim Wai Pun (Mr)
Corporate Counsel