

RESPONSE TO CONSULTATION PAPER

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Consultation topic:	Public Consultation on Managing Unsolicited Commercial Messages and the Provision of Guidance to Support Innovation in the Digital Economy
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Confidentiality	
I wish to keep the following confidential:	I do not wish to keep any parts of this submission confidential, except my contact information. <i>(Please indicate any parts of your submission you would like to be kept confidential, or if you would like your identity to be kept confidential. Your contact information will not be published.)</i>

GENERAL COMMENTS

Question 1: What are your views on the proposed scope and applicability of the DNC Provisions and the Spam Control Provisions?

Great Eastern does not object to the proposal to remove the overlap between the DNC Provisions and the Spam Control Provisions in the New Act.

Question 2: What are your views on including commercial text messages sent using IM identifiers under the Spam Control Provisions?

Great Eastern does not object to PDPC's proposal to include commercial text messages sent to IM identifiers under the Spam Control Provisions.

Question 3: What are your views on the proposed reduction of the period for effecting withdrawal of consent to 10 business days, in line with the period to effect an unsubscribe request under the Spam Control Provisions?

Although there are merits in aligning the timeframes imposed by the DNC Provisions and the Spam Control Provisions, the proposed reduction of the period from 30 days to 10 days is significant. If there is a change, organisations would need to review and change their processes.

The existing timeframe provided by the DNC Provisions is preferred.

Question 4: What are your views on prohibiting the use of dictionary attack and address harvesting software for sending of commercial messages to all telephone numbers, IM identifiers and email addresses?

Great Eastern does not object to PDPC's proposal to prohibit the use of dictionary attacks and address harvesting software for the sending of commercial messages.

Question 5: Should B2B marketing messages be subject to the requirements under the DNC Provisions, in alignment with the coverage under the Spam Control Provisions?

Although there are merits in bringing B2B marketing messages into the scope of the DNC Provisions, this will be a new requirement and changes in processes are required before organisations can comply.

Question 6: What are your views on the proposal for the DNC Provisions to be enforced under an administrative regime?

Great Eastern does not object to PDPC's proposal for the proposed DNC Provisions under the New Act to be enforced under an administrative regime.

Question 7: What are your views on the proposed obligation to communicate accurate DNCR results, and liability on third-party checkers for any infringements of the DNC Provisions resulting from inaccurate information they provided?

Great Eastern does not object to PDPC's proposal for a statutory obligation on third-party checkers to communicate accurate information regarding DNCR results and liability on third-party checkers for any infringements resulting from inaccurate information.

Question 8: What are your views on the proposed prohibition of resale of results of telephone numbers checked with the DNCR?

Great Eastern does not object to PDPC's proposal to prohibit the resale of results of telephone numbers checked with the DNCR.

Question 9: What are your views on the proposed deeming provision?

Great Eastern does not object to PDPC's proposal to introduce a deeming provision under the DNC Provisions of the New Act so that subscribers of Singapore telephone numbers are presumed to have sent the specified message unless he or she proves otherwise.

However, further clarification or practical guidance would be required from PDPC to explain what circumstances or factors may be considered under exceptions handling.

Question 10: What are your views on the proposed Enhanced Practical Guidance framework?

Great Eastern does not object to PDPC's proposal to design and implement an Enhanced Practical Guidance framework that is similar to that in other jurisdictions. Such a framework will enhance organisations' ability to seek and obtain regulatory certainty in respect of complex or novel compliance issues that are not addressed by current resources. However, it is suggested that such a framework should not be chargeable.