

Banks' Feedback on the Proposed Business Operation of the Do Not Call Registry

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| | <i>Questions in relation to the process of registration and deregistration of Telephone Numbers with DNC registry:</i> |
| Question 1 | <i>With reference to paragraphs 3.6 to 3.9, do you have any views/comments on the proposed process of registration and deregistration? Is the process simple and straightforward?</i> |
| Bank A | Nil |
| Bank B | <ul style="list-style-type: none"> • Point 3.2 . Are there any mobile applications for online access to the DNC registry for DNC registration/deregistration? • Point 3.6 . What is language support for DNC registration/deregistration? Is it only English? • Other than the validation stated in 3.6 to 3.9, can authentication be also via Singpass? How does DNC Registry validate that DNC registration/ deregistration is done by the number owner? • Can DNC registration/ deregistration be done on behalf by another person? |
| Bank C | Nil |
| Bank D | No comment. |
| Bank E | The 3 processes indicated are straight forward and easy to follow. For IVRS, at least 4 basic languages should be catered for. |
| Bank F | No comment. |
| Bank G | <ol style="list-style-type: none"> 1. We need to know the user requirements/specifications so that we can build an automated straight-through-processing (STP) system for upload and download (as manual effort is prone to errors). It will also allow us to commence work on designing our operations to manage these processes. 2. If any user (authorised or permitted to use the Telephone Number by the subscriber) of the Telephone number may also register or de-register, what is the control? How will the identity and/or the authenticity of the registrant be verified? If member A of the Tan family registers the house phone number but member B in the same family wants to receive telemarketing calls, who takes priority? There is implicit assumption that the people living in the same apartment/house actually communicate with one another. |
| Bank H | <ul style="list-style-type: none"> • Yes, the three options provided for registration and deregistration are simple and direct. They allow flexibility for which customer can easily select any one of the option at their convenience. Also, with the confirmation step of OTP and call-back enhances the protection of the customers true intention and benefits of the organization. • For recycle numbers previously registered, will they be re-set on the registration status if previous users did not de-register? |
| Bank I | In general, the proposed registration and deregistration process is simple and straightforward. However, we noted that there is no elaboration on the required verifications that the individuals need to provide during the registration and deregistration. We suggest further elaboration on what would be done to verify if the person who makes the call is the authorized/rightful party to submit the registration/deregistration for the telephone number. |
| Bank J | We would humbly request for extension of the 2nd lead in period (after 1st 6 months from the establishment of DNC Registry) from 30 days to 60 days; to minimize customer confusion. |
| | <i>Questions in relation to the process of account creation:</i> |
| Question 2 | <i>With reference to paragraphs 4.4 to 4.14, do you have any views/comments on the proposed requirements for an</i> |

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| | <i>organisation to create a main or sub-account?</i> |
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| Bank A | Nil |
| Bank B | <ul style="list-style-type: none"> Referring to paragraph 4.7, how many users ID can be created for each main or sub account or is it 1 user ID per account created only? Do we allow user ID sharing for multiple workstations? Referring to paragraph 4.10, can we provide more than 1 contact name or email or contact number for the main account and results trigger alert purposes? Can the email be a generic email account where a group of users has access to? What are the technical specifications required to set up and access the account on the daily basis within the organization secured network set up? (including any security requirement) Will there be an automated straight through interface in future which the bank will need to build an interface connection with? Will there be a periodic (monthly) or adhoc report(s) that the Main Account holder can retrieve to have an oversight of all the sub-accounts activities? (if yes, what information will be available in the report(s)?) |
| Bank C | <p><u>Contact Person Details</u> With regard to the contact person details for the main account and sub-accounts, we would like to propose for the PDPC to provide the flexibility for organizations to include more than one contact person. Given the role played by the contact person in receiving communications from the DNC registry, particularly with respect to the main account, which is the overall administrator for all sub-accounts, the inclusion of more than one contact person would help ensure that all communications are acted upon promptly and provide for covering arrangements in the event that the contact person for the account is out of office.</p> |
| Bank D | <ul style="list-style-type: none"> Para 4.10 and 4.11 on the registration for main account where Singpass of individual is required for authentication purposes, we propose such authentication to be preferably done at the organizational level (e.g. use of UEN) than at individual level (use of individual Singpass) if viable. Para 4.13, we understand that PDPA is a baseline law that applies to all organizations. Organizations however differ in size, organizational structure, roles and responsibilities, etc. In this regard, for effectiveness and efficiency, multiple user IDs should be assigned to each organization. |
| Bank E | <p>The user id and password should not be tagged to the person who registered the main account. Reason being the registered person may leave the organization and a new person would have to re-register the account and request for new id and password which will disrupt day-to-day activity and cause administrative inconvenience.</p> <p>Personal email address should not be a permitted registered email address.</p> |
| Bank F | No comment. |
| Bank G | No comments. |
| Bank H | <ul style="list-style-type: none"> On 4.10 payment method, is there other mode of payment beside credit cards and IDD? Suggest monthly billing. Will there be a report to view the number of records requested by each sub-account? This is required for accounting and costing purposes. |

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| | <ul style="list-style-type: none"> • If main account selects a payment method for the checks, can the sub-account select a different payment method? • We propose on the use of company's registration or GST registration number instead of individual's Singpass for the creation of main account. This is in view that of the tendency of staff turnover and may cause inconvenience if the organization is looking at amending the registration or deregistration process. |
| Bank I | <p>Registration for the main account can be made on the DNC registry website and Singpass will be required for authentication and to put on record the person who made the registration request for an account on behalf of the organization.</p> <p>Please clarify if the staff's personal Singpass would be used for this purpose as there may be potential implications to the organization when the staff resigns.</p> <p>With reference to 4.5, there should be proper authentication that Main A/c is authorized by his/her organization before the account creation. In addition, suggest including the process to address the resignation of Main A/c holder.</p> <p>With reference to point 4.10, we suggest considering other mode of accesses instead of using individual Singpass.</p> |
| Bank J | No Comments. |
| Question 3 | <i>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?</i> |
| Bank A | Nil |
| Bank B | <ul style="list-style-type: none"> • How many users can each account support? • Can DPC provide more than 20 sub accounts if really required for big organisations? |
| Bank C | <p><u>Number of Sub-accounts</u></p> <p>We would like to propose for the PDPC not to restrict the number of sub-accounts that can be created. As each sub-account is chargeable, organizations will likely request for a sub-account only if required. Moreover, under section 8 of the Consultation Paper, we note that the DNC registry intends to close accounts that are inactive after a certain time period. This will help to keep the number of accounts in check. Furthermore, organizations may need to create more sub-accounts over time, as the size of their operations grows.</p> |
| Bank D | <p>Para 4.15:</p> <ul style="list-style-type: none"> - We are of the view that free credits to organizations shall be differentiated e.g. according to industries, size, business volume etc. We propose to increase the number of free credits for industries in a fast changing environment where telemarketing messages are central to individuals making an informed decision. 350 free credits are grossly insufficient for organizations in the financial industry. - We propose that as long as main account and sub-accounts are the same organization, there shall be an option for the free credits to be automatically deducted and not require the main account to distribute to the sub-accounts to be more efficient and ease operational needs. <p>Para 4.16, sub-accounts shall be able to view their own transactions records such as date/time and quantity of numbers submitted while main account will be able to view the transaction records of all sub-accounts.</p> |

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| Bank E | <p>The adequacy of number of sub-accounts is dependent on the size of the organization and the scope of its business activities.</p> <p>DNC Registry should allow for registration of a back-up administrator.</p> |
| Bank F | <p>We would like to request for more sub-accounts to be provided as we have many departments and this will help in the allocation of the costs within the organization.</p> |
| Bank G | <p>The expectation is that there is only one main account and a maximum of 20 sub-accounts. From a control perspective (no sharing of IDs), there should be more than one main account in order that we do not have key person risk. The organization will determine how many main accounts. A report from DNC Registrar to detail out all main accounts and sub-accounts in effect.</p> <p>Assuming only one main account is made available, as a bank with diverse business lines, we need more than 20 sub-accounts for all the different businesses that require access. If more than one main account is available, then we need many.</p> |
| Bank H | <ul style="list-style-type: none"> • Can we allow Sub-Accounts to view transactions records too? So that we know how many we have utilized as it will be difficult to filter total volume used by all departments under main account. Especially if we choose pay-per-use mode, how can we track usage if no rights were given to Sub-accounts. • Can the results of the search be sent back to sub-account (if the request is done by subaccount) instead of sending back to main account? This will shorten the process of having to look for main account contact person to disseminate the list. • When sub-account purchase pre-paid credits, will the credits be kept in the designated subaccount? • Can the main account holder use the pre-paid credits purchased by the sub-accounts? • Can the sub-accounts also view the transaction records of all the other sub-accounts and main account? This will enable the organization to have consolidated efforts in checking against the DNC registry instead of checking through the records when there might be duplicates. • 20 sub-accounts is decent for a SME corporation however it will be good that the number of sub-accounts can be increased on per request basis so that the corporation will not have to restrict the access too strictly. Also, I will encourage if the rights and functions can be determined by the main account instead of default settings to promote flexibility. • 20 sub-accounts might be too little if the access need to be split across departments within the Bank and each department requires perhaps 1-2 user ids. • Not unless more sub-accounts would slow or impede the system, perhaps to consider increasing the no. of sub-accounts since each creation requires \$30 and Bank will have to decide for themselves how many sub-accounts to set-up. • Perhaps only main account could purchase and pay for credits? Leaving sub-accounts with only viewing rights. |
| Bank I | <p>Please clarify if each business unit within an organization will be treated as a sub-account holder. If so, as each business unit may require more than 1 sub-account to be issued for individuals of each unit, then 20 sub-accounts may not be sufficient.</p> <p>Please clarify what happens if a main account needs more than 20 sub-accounts.</p> <p>We have no issue on the rights and functions of the main and sub-account holder. However, please clarify on the turnaround time required for each function listed below:</p> |

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| | <p>Account Administration</p> <ol style="list-style-type: none"> 1) Create sub-account 2) Reset password for main and sub-accounts 3) Allocate and distribute credits among main and sub-accounts 4) Terminate sub-accounts 5) Update contact person details |
| Bank J | <p>For organizations who may request for more than 20 sub-accounts, would that be possible? Viewing of transaction records function: Sub-account holder should be able to view transactions for that sub-account in question; while, main account holder is given the rights and functions to view all transaction records across all sub-accounts.</p> |
| Question 4 | <p><i>With reference to paragraph 4.18, do you have any views/comments for not allowing foreign organization to register an account with the DNC registry</i></p> |
| Bank A | <p>We would appreciate clarity on whether the PDPA / DNC registry would be applicable to foreign organizations (which have a related Singapore entity) which directly contact Singapore individuals, even without the Singapore entity having engaged the services of the foreign organizations.</p> |
| Bank B | <ul style="list-style-type: none"> • Can a subaccount owner be physically residing outside of Singapore? |
| Bank C | <p><u>Telemarketing by Foreign Organisations</u> We note that foreign organizations that are not registered with ACRA and do not operate in Singapore are not allowed to directly apply for an account with the DNC registry. Where such foreign organizations are conducting telemarketing on behalf of organizations in Singapore, the Singapore organization can either perform the check directly with the DNC registry or create a sub-account for the foreign organization. We would like to clarify if this means that in the event foreign organizations conduct telemarketing <u>on their own</u> by calling a Singapore telephone number (which may have been collected by the foreign organizations when individuals travel to overseas countries or through other means), such foreign organizations are not required to comply with the Personal Data Protection Act with respect to the DNC registry requirements.</p> |
| Bank D | <p>No comment.</p> |
| Bank E | <p>The main concern is not so much of whether permitting or not permitting foreign organisation to register an account with the DNC registry. It is more of imposing responsibility on foreign organization that are conducting outsourcing services rather than putting the entire responsibility / onus on the Singapore registered organization that outsourced the telemarketing.</p> |
| Bank F | <p>No comment.</p> |
| Bank G | <p>No comments.</p> |
| Bank H | <p>No.</p> |
| Bank I | <p>If the Singapore registered organizations engaged the services of the foreign organizations to perform marketing activities, then the Singapore registered organizations should be held accountable for the activities of the foreign registered organizations under the PDPA. The foreign registered organisation should be able to register without a UEN.</p> |

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| | <p>The first proposed option defeats the purpose of such outsourcing efforts as there is still work to be performed by the Singapore registered organisation.</p> <p>The 2nd proposed option may lead to abuse by the foreign registered organization to use for its other clients.</p> <p>Moreover there could be foreign organisation who is not engaged by a Singapore registered organisation for any marketing activities, but purely out of social responsibility to check the DNC registry, they should be allowed to.</p> |
| Bank J | Paragraph 4.18 states %a the legal obligations and enforcement coverage of the PDPA are not directly applicable to foreign organisations.+ Therefore, in the case that the foreign organisation is not engaged by a Singapore registered organization, the requirements relating to PDPA and the DNC registry should not apply to the foreign organization. |
| Question 5 | <i>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?</i> |
| Bank A | Nil |
| Bank B | <ul style="list-style-type: none"> • Will there be any issues if we intend to get the costs of filtering against DNC from the foreign organisation? • Can we use the same approach to grant sub account access to our third party vendors (however a Singapore registered company) to filter against DNC? Can DPC provide guidance or recommendation in the control relating to the filtering process by the organization or have the third party vendor to own an account and filter on their own? |
| Bank C | Nil |
| Bank D | No comment. |
| Bank E | Same comment as 4 above. |
| Bank F | No comment. |
| Bank G | No comments. |
| Bank H | <ul style="list-style-type: none"> • Messages that were blasted from the foreign organization should be made known in affiliation to the local organization and there should be a facility on the website for consumers to crosscheck on the relationship. • The telemarketing agencies have to be registered under ACRA so they can apply for a main account to access the DNC registry. Choice of agencies may be limited. |
| Bank I | See comments for Q5 above. |
| Bank J | No comments. |
| | <i>Questions in relation to the methods provided for checking the DNC registry:</i> |
| Question 6 | <i>With reference to paragraph 5.1, do you have any views/comments on the proposed methods on how to check the DNC registry?</i> |
| Bank A | Nil |
| Bank B | <ul style="list-style-type: none"> • As we will want to keep the results of all number lookup as an audit trail for future investigation purposes, will it be possible to enable the retention of the results lookup even for small number lookup? If yes . what will be the retention period? • Will we be able to submit less than 10 numbers lookup using the bulk upload function as well? |

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| | <ul style="list-style-type: none"> According to Section 7.1 (a) on Small Number Lookup, it mentioned that "The results will not be saved in the DNC registry website for later viewing. If a permanent copy of the Results is required by the enquiring organization, the webpage showing the Results can be printed out or saved on the local machine." <p>For Small Number Lookup, the results should bounce back to organizations' database for recording, which should align with Bulk Upload Results checking mechanism, otherwise there will be no central repository for tracking and control.</p> |
| Bank C | <p><u>Business Contingency</u></p> <p>As part of business contingency planning, we would like to seek the PDPC's clarification on the alternatives that are available for organizations to submit telephone numbers to the DNC registry for checking, in the event that the DNC website is not available due to maintenance or other reasons.</p> |
| Bank D | No comment. |
| Bank E | No. |
| Bank F | No comment. |
| Bank G | No comments. |
| Bank H | <ul style="list-style-type: none"> Both methods are quite straight-forward. |
| Bank I | Please clarify if there is a cap to the bulk upload. Noted that the results from bulk upload can only be accessed by the same account that was used earlier for submission. Please advise other retrieval modes if the user for the account used for submission is on urgent leave, account was locked out due to password issues and such. |
| Bank J | The small number look up should allow submission of more telephone numbers, a number of 10 telephone numbers is very small for large organizations, whilst the bulk upload option provides the list within 24 hours, there is a lead time that organizations need to prepare for marketing to a select group and hence instant results are of immense help. A suggestion would be to allow submission of at least 500 telephone numbers under the small number lookup functionality. |
| Questions in relation to the payment schemes: | |
| Question 7 | <i>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?</i> |
| Bank A | <ul style="list-style-type: none"> - Not more than 30 per month, based on our estimates. - Pre-paid. |
| Bank B | <ul style="list-style-type: none"> Both pre-paid and pay-per-use payment schemes are likely to be used. |
| Bank C | Nil |
| Bank D | <p>Section 6:</p> <ul style="list-style-type: none"> - We propose not to have a validity period of 3 yrs for the purchased credits (refer to Para 6.6a) since inactive accounts (refer to Para 8.4) will automatically cease after 12 months. - Should the requirement on validity remain, there shall be a trigger (e.g. in the form of a report) at least 3 months prior to the expiry, on the amount of credits not utilized and their expiry date. |

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| | <ul style="list-style-type: none"> - To make available transaction records on usage and purchases to be viewed online by main and sub-accounts. The transaction records shall differentiate between usage and purchases of main and sub-accounts. |
| Bank E | Average of about 8000 numbers per month. The pre-paid method. |
| Bank F | We are expecting the average quantity to be around 550,000 telephone numbers per month and will likely opt for the pre-paid scheme. We would also like to propose an additional option of post-paid scheme to be provided as the amount payable can be substantial. |
| Bank G | <p>Corporate</p> <ul style="list-style-type: none"> • Average 4,000/month (non-customers) • Average 60,000/month (existing customers) <p>Consumer . 2 million/month</p> <p>Pre-paid credit would be more convenient and cheaper</p> <p>Urge a reduction in the costs as our consumer business alone will incur \$20K - \$30K a month. How do the costs compare to other countries?</p> |
| Bank H | <ul style="list-style-type: none"> • We are estimating that we will need to check at least 25,000 contact numbers for our Internal Sales Team per month to promote cards. Likely to use pre-paid scheme. |
| Bank I | <p>Quantity of number checks will vary from month-to-month, depending on marketing needs and requirements. We estimate average monthly quantity at 2.5 million mobile and landline numbers.</p> <p>We would likely opt for pre-paid scheme for efficiency since this will be an ongoing activity. However, as the usage from the bank is going to be high due to the huge customer base and frequency of marketing activities from different products, instead of the current credit system, we would like to propose a fixed lump sum annual fee or a corporate subscription rate that allows for unlimited checks. This will be particularly meaningful for organizations where telemarketing or SMS is an important marketing channel. The corporate subscription rate could be structured on a tiered basis i.e. based on estimated telemarketing or SMS campaign activities.</p> <p>In addition, we suggest removing the validity period for the purchased credits since consideration has already been paid for services yet to be rendered.</p> <p>With a lead-in period of only 30 days, organizations with big customer bases (over a million) would find it costly to conduct a search every time they embark on a telemarketing project (perhaps once a month?). We suggest that the validity period be extended in order to reduce inefficiency.</p> |
| Bank J | The payment mechanism seems to suggest that it can cater to individuals only with credit cards and internet banking accounts |

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| | <p>with DBS, UOB and OCBC. Would PDPC consider other payment methods which can be used by large organizations which would be pulling on bulk basis (e.g. standing instructions/GIRO payments). PDPC can enter into specific agreement with such bank for payments as the checking of numbers will be done by designated individuals for organizations and the PDPC should cater to debiting of accounts of organizations, Also, individuals should be allowed to debit bank accounts that they may hold with other Qualifying Full Banks, The facility should not be limited to DBS, UOB and OCBC.</p> <p>It is also worth highlighting that the rates between pre-paid and pay per use are significantly different with pay per use rates being significantly higher. Given that PDPC's intent is to ensure consumer protection and that its users make payments for the usage. The rates should not be so disparate.</p> |
| Question 8 | <i>With reference to paragraph 6.7, do you have any views/comments on the proposed modes of payment?</i> |
| Bank A | An alternative mode of payment for the Commission's consideration would be invoice billings on a periodic basis e.g. monthly or quarterly, instead of the current proposed payment modes online via credit card or Internet Direct Debit (IDD+) Services. From the perspective of organizations, periodic invoice billings could be less of an administrative burden, compared to the proposed online payment modes. |
| Bank B | <ul style="list-style-type: none"> • Will there be a one-off exercise for organisations to sign up for this for the purposes of DNC? • Please advise the content of the invoice that will be shown? And is the invoice addressed to DPO only? |
| Bank C | <p><u>Modes of Payment</u> For corporate governance, we would prefer to be issued with an invoice to make the required payment (be it for prepaid or pay-per-use) through e.g. interbank funds transfer.</p> |
| Bank D | We propose to expand the payment modes to include payments via cheque, MEPS payments etc. This will greatly facilitate payments at organizational level instead of at individual level. |
| Bank E | Should cater for auto-deduction from designated bank account with DNC Registry. |
| Bank F | No comment. |
| Bank G | No comments. |
| Bank H | <ul style="list-style-type: none"> • The commission can consider to allow pre-approved or qualified organizations to make payment by invoicing at month end or through monthly GIRO deduction or through internet banking • It will be good if there is cheque payment option as the payment will usually be disbursed by the account department. • Can the organization submit a request to create all accounts (1 main and 20 sub) at one go, and arrange for payment via cheque? • Any credit-free period for the payment? Typically organizations require an invoice to process payment, and the turnaround for processing the invoices is 30 days. • For either mode of payment, would it be able to reflect which sub-accounts used it? |
| Bank I | <p>We would like to propose the following mode of payments:</p> <ul style="list-style-type: none"> • Invoices (this will be appropriate for organizations opting for pre-paid schemes) • Giro |

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| | For big organizations, their respective business units should not be making payment in isolation. Payments should be consolidated at organization level for bulk discounts, efficiency and controls. |
| Bank J | Besides internet bank transfers and credit card payment, we would propose that organisation be allowed to establish standing instruction/GIRO facilities for ease of operation of its Main and sub-accounts. Also, individuals should be allowed to debit bank accounts that they may hold with other Qualifying Full Banks, The facility should not be limited to DBS, UOB and OCBC. |
| | <i>Questions in relation to the retrieving results:</i> |
| Question 9 | <i>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?</i> |
| Bank A | Nil |
| Bank B | <ul style="list-style-type: none"> • What is the proposed upload / transmission/ file upload exchange method i.e. via web portal, server, SFPP upload? • Can the results files be more than > 10MB? • Can DPC provide us with the technical set up or contact for us to finalise/ enable the technical set up on the organization end for filtering against DNC? We need to know more about the specifications of the file to enable any technical solution implementation internally within the organization. • Why does DPC require 24 hours to return the results? Are we looking at enhancing this turnaround time in future to enable time to market execution? • For small number lookup . other than online results being shown on the website. Can the results be downloaded in electronic method? (e.g csv, or pdf format)? • What is the operating hours for the DNC registry? Business day 0900-1800? |
| Bank C | Nil |
| Bank D | No comment. |
| Bank E | R . to be replaced with a tick (½) NR - to be replaced with a hyphen (-) |
| Bank F | No comment. |
| Bank G | 24 hours required for results generation results in delay in calls and reduce effectiveness of BDA channel and other marketing campaigns. It would be good if the turnaround time can be reduced to within a 2-hour timeframe. There should be a summary report showing the number of records uploaded and the validity of the phone numbers that have been uploaded. Proposed process for manual eyeballing is inefficient and error-prone. Are there controls in place to ensure the returned files are correct and not belonging to other organisations? We recommend a service level agreement on upload and download via portal. E.g. time needed for 1 million records. |

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| Bank H | <ul style="list-style-type: none"> Ideally the output result should be able to download to excel instead of image format or restricted access for easy reference for the users. |
| Bank I | <p>Please advice if there are alternative methods to upload and retrieve data from the DNC registry (e.g. Secured File Transfer Protocol) to facilitate the process automation by the respective organizations.</p> <p>Please clarify on the file layout of the results. We prefer to have header (including information such as processing date and validity period of the results) and trailers (including information such as number of records contained in the file).</p> |
| Bank J | At a minimum, DNC should be able to provide audit trails of results obtained by individual organisations (with date & time stamps) in case of disputes. |
| Question 10 | <i>In particular, do you have any views/comments on the type of file (".CSV") that is proposed as the format of the Results file?</i> |
| Bank A | Nil |
| Bank B | <ul style="list-style-type: none"> Can the results be also in pdf format? |
| Bank C | Nil |
| Bank D | No comment. |
| Bank E | No comment. |
| Bank F | No comment. |
| Bank G | One option to check DNC Register should be through virtual session to the organization (e.g. mutual authentication using certificates) to provide better efficiencies rather than csv mode (batch mode) or manual checks. |
| Bank H | No. |
| Bank I | <p>In addition to the CSV format, we would prefer to also have the option to choose the type of file format e.g. excel.</p> <p>Please clarify on the format of the CSV file. Is it delimited by special characters? If yes, what are these special characters? Or, is it a fixed length column? We would prefer a fixed length column format.</p> |
| Bank J | In the event that the organisation faces technical problems during the upload/download of files, would there be any technical support made available? |
| | <i>Questions in relation to the account termination:</i> |
| Question 11 | <i>With reference to paragraphs 8.5 to 8.7, do you have any views/comments on the proposal to refund all balance pre-paid credits from all the sub-accounts to the main account?</i> |
| Bank A | Nil |
| Bank B | No further comments. |
| Bank C | Nil |
| Bank D | No comment. |
| Bank E | If sub-account holder is an outsourced company, main account holder would have to keep track of the amount refund and make the payment to the outsourced company. This will pose some inconvenience and confusion if there are more than 1 outsourced company involved. |

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| Bank F | No comment. |
| Bank G | No comments. |
| Bank H | <ul style="list-style-type: none"> Will there be any records of how much of the refunded pre-paid credits are from the respective sub-accounts? |
| Bank I | <p>In the context of a large organization, if main account and sub accounts are managed by different business units, for proper accounting records, the refund should go back to the respective sub-account holders.</p> <p>As mentioned in response to Q8, the respective business units within an organization should not be making payment in isolation but consolidated at organization level.</p> <p>With reference to 8.2, please clarify what the organisation can do to update the record when the contact person for the main account has left the organisation.</p> <p>If the sub account is inactive, suggest the email to be sent to both the sub account contact person and the main account contact person.</p> |
| Bank J | It is preferred that the balance prepaid credits be refunded to the respective sub-account. It should also be made possible to check balances of the sub-account online as and when required. |
| <i>Additional Comments, if any</i> | |
| Bank A | Nil |
| Bank B | <ol style="list-style-type: none"> For paragraph 2.13, for withdrawal of consent, can PDPC clarify if it is 30 working days or 30 calendar days? For paragraph 3.19, does the organisation has the responsibility as well to verify the accuracy of the number provided to us? Do we need to validate whether the individual is indeed the %user+or the %subscriber+of the number provided to us together with the consent? Will there be any industry wide testing exercise to be conducted to ensure readiness for DNC checking using the accounts? |
| Bank C | <p><u>Closure of Inactive Accounts</u> To keep the administration of the DNC accounts simple, we would like to propose for the PDPC to treat all the accounts registered under an organization as active, so long as the main account or any of the sub-account is still in use. For organizations with decentralized marketing functions, certain units may make use of the sub-accounts more frequently compared to the rest of the units, though at the entity level, the organization remains an active user.</p> <p><u>Validity Period of Results</u> We would like to propose to the PDPC to consider allowing the validity period of the results to be extended from 30 to 60 calendar days (even after the 1st 6 months of DNC operations) so that organizations can cut down on the need for re-checks against the registry.</p> |
| Bank D | <ul style="list-style-type: none"> We refer to Para 3.16 and in relation to termination of service subscription with telecommunication service providers, there shall also be a process in place to manage the reuse of telephone numbers by service providers. This is to ensure individuals with reuse numbers who do not know that they have been placed on the registry are not deprived of the opportunity to receive |

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| | <p>marketing information from organizations.</p> <ul style="list-style-type: none"> - There shall be process and procedures in place to ensure data sent to and from the Registry is properly secured during transmission. - The establishment of a contact point or enquiry desk on matters relating to the DNC Registry. - The business continuity plan in place in the event that the DNC Registry is unavailable for filtering e.g. technical occurrence in systems. |
| Bank E | <ol style="list-style-type: none"> 1. If a sub account is inactive but main account is active, will the sub account be terminated? 2. Is the %unclaimed monies+available for claiming at a later time? Any validity period? What are the procedure / condition to qualify for claiming the %unclaimed monies+? 3. The DNC registry should have a pop up reminder of low credit balance. |
| Bank F | Nil |
| Bank G | <p>The following scenario may result in an unintentional breach that we would like the PDPC to address:</p> <ol style="list-style-type: none"> 1. Mr. Aq has a telephone number 12345678. He is a customer of Company Z and gives it direct consent to send marketing messages or make marketing calls to this number. 2. Mr. Aq changes his telephone number but does not update Company Z. The number 12345678 is recycled by the telco and assigned to Mr. Bq 3. Mr. Bq registers the number 12345678 on the DNC. However, this number still appears as the number of Mr. Aq in Company Z's record and consent is given to send marketing messages or make marketing calls to the number. 4. Company Z continues to send marketing messages and make marketing calls. Mr. Bq makes a complaint to the PDPC. <p>PDPC may want to consider having a provision which protect companies in the event there is reasonable excuse e.g. customer does not update the company of their change in telephone number and telcos recycle telephone numbers. These are beyond the controls and knowledge of the companies.</p> |
| Bank H | <ul style="list-style-type: none"> • Within the 3 Registers (i.e. Voice Call, Text Message, Fax), suggest to further categorized the products that wish to register. Example, a telephone number owner may want to register Text Messages from Credit Companies but not from Property Agents. An Other option can be made available to handle new products or rare products. • Under Paragraph 2.13, can we confirm that if the customer has indicated clearly in signing that they have given consent for sending of specified messages to a telephone number and they have not given notice to the bank to withdraw from this consent, we can still continue to send marketing messages & conduct marketing calls to the customers even though they have also registered with the DNC registry? • Perhaps to include the number of small number lookup from 10 to 50 or 100? Since anything beyond 10 numbers require 1 |

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| | <p>day to receive the results.</p> |
| <p>Bank I</p> | <p>1. With reference to the illustration below (in pg 36), please clarify on %till end July+stated on the illustration. It seems to show that submission in Jul and Aug will also be valid till end Jul.</p> <div data-bbox="504 335 1803 614" data-label="Diagram"> <p>The diagram illustrates a timeline from January 2014 to August 2014. A solid horizontal line represents the timeline, with vertical tick marks for Jan 2014, Jun 2014, Jul 2014, and Aug 2014. A blue double-headed arrow labeled '60 days' is positioned above the line, spanning from the beginning of Jan 2014 to the beginning of Jun 2014. A dashed blue double-headed arrow labeled 'till end July' is positioned below the line, spanning from the beginning of Jun 2014 to the end of Jul 2014.</p> </div> <p>2. Regarding the lead-in period (or validity period for the checks), we recommend to be consistent at 60 days.</p> <p>3. If the organization wish to contact an individual and there are records of 1 home number, 1 mobile number and 1 office number, please clarify if this considered as 1 record at customer level or 3 records.</p> <p>4. Please clarify if there is an arrangement to allow the Bank to perform a one-time check on DNC and subsequently for DNC registry to advise the Bank on delta changes.</p> <p>5. With reference to 4.15 on the 350 free credits allocated to main account, suggest a higher number of free credits and tiered by size of organisation.</p> <p>6. With regards to the Framework between Bank and DNC registry for handling of Customersqueries, if customer claims that he/she has registered with DNC registry, e.g 1 year ago, Bank may need DNC registry to advise the effective date of DNC registration. The query results report does not provide effective date of registration.</p> <p>7. Please clarify on how the bank can handle the issue of recycled phone numbers as authentication is via contact numbers without customer particulars. e.g Customer A with mobile no. 97121234 registered with DNC. Customer A terminates mobile no. 97121234 but did not update DNC on termination of mobile no. Mobile no. 97121234 is assigned to Customer B by Telco. In this scenario, bank will not be able to send marketing message to customer B although he did not register for DNC.</p> |
| <p>Bank J</p> | <p>1. With reference to paragraph 2.12, consent from a third party acting on behalf of the subscriber or user of the telephone number should be deemed as valid consent if the third party provides the organization a representation that the subscriber or user of the telephone number consents to be called/receive specified messages by the organization and the organization should not be required to check the DNC registry. For example, in a referral scenario, the referring party provides the telephone number of a</p> |

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| | <p>prospect who wishes to be contacted about products and services represents to the organization that the prospect consents to be contacted by the organization about the organization's goods and services.</p> <p>2. How would the government educate the public about PDPA (specifically their rights so there is no false expectation/understanding that organizations would then have to deal with) and what is expected of organisations to do the same? Specifically, it is preferred that the government educates the consumer about the time needed to register their number(s) onto the DNC Register and when DNC obligations are fully effective (due to the 30/60 day lead in period where the consumer might still be receiving marketing calls). This is to ensure that customer complaints are kept to a minimal.</p> |
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