Do Not Call Registry

Comments on Proposed Business Operation

Prepared For:	AAM Advisory Pte Ltd
Co. No.	198802184Z
Contact:	Anuradha Phanse
Title:	Head of Compliance
Email:	anu@aam-advisory.com
Phone:	+65 6899 6930
Prepared by:	Ewan Makepeace
Date:	13th June 2013
Title:	Managing Director
Organisation:	Social Networks Pte Ltd
Email:	makepeace@socialnetworks.com.sg
Phone:	+65 818 234 10

Summary

The author feels that without the addition of a Web Services Interface (API) by which organisations can automate the lookup of phone numbers in the Do Not Call registry, this proposal imposes an unreasonable burden on the users of the system.

Such a system would permit authorised users to submit numbers electronically to the registry and receive an immediate response on whether the number may be called or not. By making this a computer - computer interaction, the details of numbers already checked can be recorded creating the following benefits:

1. If a number is to be called again within the period of validity of the result, no further query to the registry will be made, saving the organisation time and expense.

2. All queries made can be recorded so that if call activity is ever audited it will be possible to show which numbers were checked with the registry, by whom and at what time.

3. The system will be faster than manually logging into the registry website, entering numbers and recording the result, reducing the efficiency penalty of using such a system.

Small Number Lookup

The proposed business operation of the Do Not Call Registry describes two options for checking numbers. The first and simplest of these is the Small Number Lookup:

> *For Telephone Numbers submitted using the Small Number Lookup method, the Results will be shown immediately on the webpage. The validity period or expiry date of the Results will be displayed with the indicators on whether the Telephone Number is registered and in which register. 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 organisation, the webpage showing the Results can be printed out or saved on the local machine.**

This method is the most immediate and simplest to use but the text above highlights a serious drawback: there is no record of the check. If the user is ever challenged on a call they made (and presumably accused of calling a number that the other party claims is registered in the Do Not Call register) there is no record and so no proof that the check was made.

Even if the registry does actually record such things, they are not made available for internal checks and policing of the sales staff and so this is not a method that can be properly policed by the compliance officer.

> *The Results will be valid for a period of time from the date that the Results are returned to the organisation or until a specific expiry date. Similar to the 'lead-in period' explained earlier, to allow more time for organisations to adjust their telemarketing activities,* **the validity period of the results is 60 days for the messages sent during the 5 months of DNC operations and 30 days after the 6**[th] **month** *of DNC operations onwards.*

There is a validity period after the check is made - initially 6 months, dropping to 3 months later. This could be important because a charge is made for every number checked and so organisations will be looking to avoid checking the same number repeatedly within the validity window.

However managing these numbers and the window of validity is challenging - if users enter a number in a web page and get a green light to call on the same page, it would represent a significant overhead of time and resources for them to log that number in a database, together with the validity period, and if asked to do so this could be a source of errors. It is desirable that this sort of bookkeeping be automated.

Bulk Upload

The only suggested alternative to the Small Number Lookup interface is the Bulk Upload of numbers in CSV (Comma Separated Values) format. The proposal has this to say about delivery of results from the Bulk Upload:

> *For telephone numbers submitted method, **the Results will be available for retrieval within 24 hours**. An email will be sent to notify the registered contact person of the account[9] when the Results are ready. To access the Results, the same account that was used earlier for submission should be used to log in to the DNC registry to retrieve the results. The Results will remain available for online access throughout the validity period or until the expiry date of the Results. After the Result's validity period or expiry date, the file will no longer be accessible.*

This process solves some of the drawbacks of the Small Number Lookup interface - in that the .CSV format file could be computer generated and the results entered into the same program to record the checks, and register the validity etc. However it is also unattractive due to the following factors:

4. It is cumbersome - the user still has to log in to the website, select and upload a file and then wait for an email notification (up to 24 hours later). They then have to log in a second time and download a file of results, before performing subsequent processing on that file.

5. Assuming each sales person is responsible for their own leads and checks that still represents a lot of lost efficiency.

6. The delay between submitting numbers and getting results means that the sales person has less flexibility in their role - leads cannot be followed as promptly, and if one number is a dead end they cannot call a second number unless it too was added to the list and checked against the registry.

7. If all possible/known numbers for a person are submitted for checking at the same time, this represenets additional costs/overhead in the form of the charges per number checked, if the lead is successfully contacted on the first number called.

For example, suppose Benny has a business card for a potential customer James. He submits James' Office number for checking. After getting clearance the next day Benny calls that number, but James is out of the office. At that point Benny would like to call the mobile number listed on the card - but must file another CSV and wait another day before getting clearance.

Had he added both Office and Mobile numbers to the CSV file the day before he would not have had to wait, but would be burning through extra credits for the numbers checked, for no benefit in many cases.

Web Services API

What is required is a Web Services API (Application Programming Interface). Few new computer systems are designed these days without one and so it was a surprise to find none was proposed for the registry.

This need not be a complex addition - it will perform exactly the same function as the Small Number Lookup, but in a way that can be programmed into a piece of software.

The API would need these two elements:

8. Authentication - using a standard protocol such as OAuth or OAuth2 the client system would first authenticate (login) using the same client credentials as the web site.

9. Lookup - a number would be provided and the response given, probably formatted as a JSON object.

Integration

AAM already maintains an internal Do Not Call list and every potential sales listead is first screened to ensure that the number is not a) on their own Do Not Call list or b) belonging to an existing client or prospect. It would be extremely logical for them to add an extra check against the proposed Do Not Call Registry at that point.

Every number checked would be logged - then if the same number is proposed again, the validity period of the previous check can be examined, and if necessary the registry queried again.

Likewise if a sales person is ever audited for their behaviour (either internally or by regulators) then the system can provide a detailed, time stamped record of every number proposed and checked.

Lastly but perhaps most importantly, by reducing friction in using the system and making it seamless for the sales staff, the risk that they will simply 'forget' to check numbers is greatly diminished. The secret to enforcing rules is to make following them easier than not... such an integration would make the registry truly effortless to integrate into the sales teams workflow - whereas the proposed business operation seems almost designed to invite disobedience and non compliance.

Conclusion

AAM is enthusiastic about the Do Not Call Registry and completely committed to using it to check all numbers prior to calling them. However the proposed business operation will impose significant burdens both in terms of efficiency and management of the data.

It is requested that PDPC consider including a web services API with the system so that these checks can be automated, providing better reliability and seamless integration with sales workflows.