

Feedback for

**Public Consultation of the Proposed Consumer Data Protection Regime for Singapore**

**Submitted by**

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**Questions in relation to proposed National Do-Not-Call registry:**

**Question 23: Do you have any views / comments as to whether a National Do-Not-Call registry should be set up in Singapore?**

Comments:

a) The National Do-Not-Call (DNC) list is a convenient tool for end user to opt-out from all organisations from a single registry but poses many implementation/practical issues and costs.

b) implementation and cost issues include:

- Does the DNC provide an online service for organisations to check the numbers registered in DNC?

- If it is online, is it efficient in processing thousands or millions of requests per day?

- If it has high volume processing, who will bear the heavy setup and maintenance fee?

If the calling party (CP) need to pay to check for the numbers' availability, the cost will be prohibitive if the numbers are checked regularly

- Is the CP at fault if they 'check the DNC before user unsubscription' and subsequently inconvenienced the user and the user file a complaint? Is the CP liable?

- Is the CP expected to check the DNC before calling/sending SMS and how long they can keep the list current? Eg, Can CP check one day prior to calling or must check real-time?

Conclusions:

a) There are costs associated with maintaining and checking the DNC list. This cost may be small on per transaction but will be prohibitive due to the volume and frequency of checking.

b) Maintaining a central list will create 'timeliness' issue. If this issue is not addressed (at minimal cost to the users/CP), this will not be effective.

c) The onus of removal from the list is on the end consumer. We propose to use a self governing process for the service providers (CP). This will reduce transaction cost and remove the presence of 'grey areas' raised by timeliness of information/updates

d) self governance with monitoring (by the authorities) will reduce the transaction costs and beneficial to all stakeholders.