

From: Tele Link Singapore
Sent: Friday, 16 September, 2011 10:45 PM
To: MICA DP Public Consultation (MICA)
Subject: Feedback on DP ACT & "Do not call" registry

Dear Officer-in-Charge

I would like to seek clarification on the proposed rule by MICA. Tele Link Singapore is a newly set-up company, which is in support role to sales agents from businesses to do cold call to prospect to find out the needs & requirement of individual consumers. Our company 'mission is to provide quality, responsibility & professional phone calls to individual consumers to source for business opportunities to our clients. According to the proposed DP Act, there is ruling on the usages, collection & disclosure on the data of the consumers. Current operation, our company involve in doing cold call to targeted consumers based on our client requirement, i.e Our client will provide us with call list database which they get hold of it from database company. Question 1: Will our company infringed the DP ACT, if the usage of call list provided from the client's database company had violated the ACT. Would need clarification on the scope & involvement with our company's operation.

Secondly, i would like to touch on the "Do Not Call" Registry. I look at this issue based on two perspectives: Consumer & Businesses. On Consumer basis, i find that the "Do No Call" registry are somehow or rather useful to the public, as it eliminate "cold calls". But this registry is not without any loophole, as company would tend to shift their operations to overseas which is not in the scope of this ACT. This ultimately does not solve the problem totally, as consumer would still receive unwanted calls, even worst, these calls are not make with quality & with responsible as company from overseas does not worry about the regulations.

From business activities point of view, the "Do No Call" registry would further dampen the business operation needs, which is marketing. Marketing is one of key factor in a normally business operation as it create awareness & branding of the individual businesses. Having implementing this rule, most consumer would register their number as "Do Not Call", as normally none of the consumers would appreciate cold calls, even myself. With most of the populations which might register their number in this, company lack of this type of active marketing strategies & would only left with using online/media advertisement or maybe through road show. The impacts of this ruling will definitely damage on the Telemarketing Company, as the expose to audience is further reduces. (Even with those who did not register in the registry, they will eventually opt out as most telemarketer will make phone calls to them as they are the only option. Creating their volume of cold calls to increase dramatically.) Telemarketing company / Call centres would eventually unable to survive in these industry. Having a lot of telemarketers going out of jobs, which will eventually affect Singapore Unemployment rate. Second to impact will be on the business associate, for example Property agents, insurance agents & financial product agents. These are a group of sales representatives that greatly uses these type of marketing strategies to source for business opportunities. Although, they are only a fraction in the industry, but sales volume to them will be affected.

Lastly, i would like clarification on the penalty of the violators, as i am in the business of cold callings, i understand the operation well, & i understand that there quite impossible for telemarketers not to make mistake by dialling the wrong number & get to the user who had opt out cold call. Will these types of mistakes be given exemption? Another issue, is that although the authority suggest the telemarketers to check the number before dialling the number, & if the user register the number few moment ago, while the telemarketers check the number earlier than that which the number is not yet updated, is that a violation under these situation. However, the authority could suggest for telemarketer to check real time which is tedious to do so, but if situation like lag in computer

network, how will these complication be settled. In addition, does this ruling apply to mobile no. only or both residential & mobile no ? I understands the needs of implementing these ruling, but however we pleased the public but put on more damage on the others involves.

(Please advise on these issue, however i would appreciate if you could arrange an appt for further discussion)

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Your sincerely,
Andy Toh Qi Yao
Managing Director

Tele Link Singapore