

## **SUBMISSION OF COMMENTS TO MICA**

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### **1) RE: DNC REGISTRY**

When I read the news about DNC rules and regulations, I feel that our government is doing a good job. It cares for and responds to public interests and privacy concerns. However, I do not think it is necessary to set up DNC Registry. I think it will be less costly and more effective and viable if the government stipulates that all individuals and companies or organisations use telephones that have been installed call reject functions and also make it a law that once people reject the call, callers can not call the same person again nor circulate his/her contacts to other parties.

Reasons are as follows:

As a business man, I understand that sales & marketing activities are major business activities for all companies, especially those SME or startup companies.

In today's fast moving society, telephone sales are seen as one of the most effective way to approach clients and conduct business, and many companies, especially SME and startup companies need this tool to build up their business.

Setting up DNC Registry that requires individuals & companies to submit their list of customers to DNC registry every month for screening will restrict companies to conduct business through sales & marketing indirectly and it will be troublesome, costly and time consuming for companies particularly sme & startup companies to submit list for screening every month. It may be sensitive as companies may not like their contacts of customers to be released to other parties.

Moreover, companies' list of clients may be very long or in ten thousands or even hundred thousands. It may add heavy work load and be costly for the government to screen huge quantity of lists every month.

On the other hand, from my work experience as sales manager who did telephone sales and marketing jobs before, I find that when we call people even cold call clients to introduce products or services, a majority of call receivers are not negative about cold calls. Call receivers have their liberty and ways to reject the call by telling callers directly that they are not interested and do not call them any more. They can also setup call reject list in their handphone or telephone if they do not want to be called by some callers. Since people have the way of avoiding call disturbance through their telephone setup, telephone sales, as a normal business activity, shall not be regarded as a disturbance and nor is it necessary to be restricted.

Therefore, Instead of spending money and labour on monitoring people's contact details through DNC Registry, I believe it will be less costly and more effective and viable if the government stipulates that it is compulsory for telephone vendors to sell telephones with call reject functions and that all individuals and companies or organisations use telephones installed with call reject functions and also make it a law that once people reject the call, callers can not call the same person again nor circulate his/her contacts to other parties. In this way, business activities will not be restricted or affected while DO NOT CALL objective shall be achieved.

## **2) RE: PDP LAW**

I think setting up PDPA and PDP Law is necessary and it prevents misuse of personal data. However, I hope government take into account the necessity of acquiring people's name and contact numbers in business and social networkings and business contact information. I don't think government's objective in setting up PDPA is to limit or make it difficult for normal business and social networkings or contact information. It would be good to balance out between PDP law and people's normal needs for business and social contacts and networkings in making policies concerned.

Above are share of some personal views only. Thank you for your consideration.

Best regards,

Ms Jenny Toh