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Consultation on Review of IDA's Regulatory Requirement for Directory Services

I will like to give my views with regards to the abovementioned subject.

Question 1: IDA invites views and comments on the current situation in relation to Directory Services, in particular, whether you agree with the trends observed on the demand and usage, and whether Directory Services in their current form continue to be relevant in today's environment.

In my option, I agree that with the prevalent use of the internet and social media, there is less need to use a directory and has become irrelevant in this time and age. Hence I agree what IDA has stated in its consultation paper, that demand and usage has fallen around the world on directory services.

Question 2: Do you agree that IDA should adopt Option 2 to remove the regulatory requirement for provision of integrated directories but retain the requirement for the provision of directory enquiry services? If not, please state your preferred Option and the supporting reasons.

I don't prefer either option stated in your paper. For not agreeing to option 2, the reason is that most residential subscribers and non-subscribers now have mobile phones and since mobile numbers are not allowed to be listed in the directory, a directory enquiry service may not be applicable to find a person that one wants to contact. I, for one, have not on any occasion gone to online yellow pages to enquire on a residential number.

If I were to choose option 3 and having regulatory requirement for the provision of integrated directory means printing and issuing CD-ROMs of the directory, I will have to disagree.

Question 3: Are there other options that IDA may consider in the review of the regulatory requirement for Directory Services?

I will like to suggest that business listings and yellow pages be made available online and offline instead, which in this case is considered as a directory enquiry service. This is more environmentally friendly and it makes it convenient for companies and members of the public to search for the company that they are enquiring on.

Question 4: IDA invites views and comments on IDA's proposal to require Fixed-Line Operators to cease charging subscribers for unlisting their numbers.

I think this is a good move and should be encouraged. The company that I am working for had planned to unlist some phone numbers permanently. When the company found out that it had to pay for the unlisting of numbers, it backtracked and had to list those

numbers up. By unlisting those numbers that the company does not want anybody to know, it will give the company some sense of privacy as well as controlling the calls that are made to the company. For residential subscribers, it will give them a sense of privacy and will be spared the agony of getting spam calls.

Question 5: IDA also invites views and comments on whether IDA should require the Fixed-Line Operators to obtain the subscriber's consent to be included in the directory services database on an opt-in (i.e., the subscriber must explicitly give consent to be included in the database) or opt-out basis (i.e., the subscriber will be included in the directory services database by default unless the subscriber takes action to opt-out from it).

I will prefer an opt-out basis for both the residential and business subscribers. IDA should mandate the Fixed-Line Operators to inform and notify both residential and business subscribers of the hotline to call to opt-out of the listing in the database. In fact, if there is no need for a residential directory service database, then this issue of opt-in or opt-out will not have been an issue already. But nonetheless, if the majority decides on a residential directory services database, then I will go for an opt-out basis.

Regards

Kelvin Tan