

Robin Ng
Orange Gum Pte Ltd
371 Beach Road
#02-26, KeyPoint
Singapore 199597
Tel: +65-6396-8981
Email: robin.ng@orange gum.com

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To:

Mr Andrew Haire
Deputy Director-General (Telecoms)
Infocomm Development Authority of Singapore
8 Temasek Boulevard
#14-00 Suntec Tower Three
Singapore 038988

RE: Comment on Proposed Code of Practice for Provision of Premium Rate Services

Dear Sir,

We have reviewed the proposed code of Practice for Provision of Premium Rate Services (PRS) drafted by IDA. First for all, we commended IDA's effort to regulate and safeguard end consumer's interest on PRS. Customers have often been lured by unclear advertising messages to subscribe to PRS without clear knowledge of the actual pricing. We agree with IDA that such practices should be cleaned up to have more transparent pricing information to the public consumers.

However, for companies offering genuine value-for-money PRS are concerned with the cost of SMS reminders and acknowledgement. PRS services are extremely competitive in Singapore. Whilst other companies resort to unclear and shady advertising messages to attract customers, Orange Gum offers quality services with low pricing to our customers. As IDA proposed the cost of reminder and acknowledgement SMSs to be sent to users as free, service providers need to absorb these costings. If such costings are being absorbed to the PRS package, service providers will have no choice but to pass these costings to the customers by increasing the package price of the PRS.

Comment on 2.7 – Duty to charge only for content

In the industry of subscription services of all kind, it is NOT a usual practice for service providers to provider reminders and acknowledgements. Information on pricing and renewal is often stated upfront to the customers. Some examples of no-reminder renewal and acknowledgement services are credit card renewals, telecommunication value-added services renewals, etc. If renewal and acknowledgement information is compulsory, then IDA MUST support the industry by subsidizing such costs to the service providers or getting the telco to sponsor such messages. In our humble opinion, the local telcos are already getting high commission on the billing-on-behalf revenue and therefore to keep the PRS going, they should be supportive to help to get these practices in place.

Comment on 2.10 – Duty to provide clear, accurate and timely billing

We feel that this is telcos' responsibilities to provide clear, accurate and timely billing. Charges being sent to the telcos for processing. However, often there are customers' enquiry on late billings. This is beyond control of service providers, as telcos systems are responsible for such processing arrangements.

Hope you will review our comment to ensure a healthy and competitive environment for BOTH service providers and public consumers.

Thanks n regards,

Robin Ng
CEO,
Orange Gum Pte Ltd