

## REVIEW OF IDA'S REGULATORY REQUIREMENT FOR DIRECTORY SERVICES

### 1. Introduction

- 1.1 Singapore Telecommunications Limited (**SingTel**) welcomes the opportunity to provide its views and comments in relation to the IDA's review of the regulatory requirement for directory services requirements (**Directories Requirements**).
- 1.2 Under the IDA's current regulatory requirements, SingTel is required to provide integrated directories and a directory enquiry service (together **Directory Services**) to all its residential and business fixed-line customers.
- 1.3 SingTel welcomes the IDA's review of the Directories Requirements. We believe that a review of the Directories Requirements is timely given the significant changes in the market, including in technology and consumer behaviour.

### 2. General Comments

- 2.1 In relation to the provision of integrated directories (i.e. the "White Pages"), SingTel notes the IDA's observation of a decline in the number of residential listings and business listings collected and used as reflected in the IDA's household survey. However, SingTel notes that a number of customers (notwithstanding that this accounts for less than 9% of the customers) still choose to collect the integrated directories despite the apparent ease of use of the Internet as an alternative channel of information.
- 2.2 Such customers, whether as a matter of need or habit, continue to rely on the integrated directories as a means to search for directory information. SingTel therefore submits that it is prudent for the IDA to continue imposing the Directories Requirements in relation to the provision of integrated directories at this time.
- 2.3 In relation to the provision of the directory enquiry service (i.e. "Service 100"), SingTel notes that there are still a significant number of requests by fixed-line customers for the directory enquiry service. This indicates that many fixed-line customers still rely on the

directory enquiry service as a quick and convenient method to search for the directory listings.

- 2.4 In view of the above, SingTel submits that there is still a significant demand for the provision of Directory Services. However, we recognise that demand is (and will continue to) decline significantly in the coming years. It is therefore prudent for the IDA to continue imposing the Directories Requirements in relation to the provision of Directory Services at this time. However, the IDA should monitor and review the Directories Requirements should the trend of declining requests for the Directory Services continue.

### 3 Specific Comments

- 3.1 Below, SingTel provides its specific comments in relation to the questions raised by the IDA.

***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.***

- 3.2 SingTel notes the IDA's observation on the trends on the demand and usage of the Directory Services. Notwithstanding this, SingTel notes that a number of customers (notwithstanding that this accounts for less than 9% of the customers) still choose to collect the integrated directories despite the apparent ease of use of the Internet as an alternative channel of information. SingTel also notes that there are still a significant number of requests by fixed-line customers for the directory enquiry service, and that there remains a large part of the Singapore population, i.e. the elderly and less technology-savvy customers, who may not be comfortable or proficient in the use of alternatives such as the Internet to search for directory information.
- 3.3 In view of the above, SingTel submits that it is therefore prudent for the IDA to continue imposing the Directories Requirements in relation to the provision of Directory Services at this time.

- 3.4 SingTel also wishes to highlight that any review of the Directories Requirements on fixed-line telephony service operators should be non-discriminatory, i.e. the Directories Requirements should continue to be applied or removed (depending on the IDA's review) on all fixed-line telephony service operators on a non-discriminatory basis.

***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.***

- 3.5 As indicated above, a number of customers (notwithstanding that this accounts for less than 9% of the customers) still choose to collect the integrated directories despite the apparent ease of use of the Internet as an alternative channel of information. Such customers may prefer to use the integrated directories to search for directory information as these directories are found within their homes and can be easily accessible.
- 3.6 Should the IDA choose to adopt Option 2, such customers will have little choice but to either seek help from relatives, friends or neighbours who are comfortable and proficient in the use of the Internet, or call the directory enquiry service (which is a chargeable service). SingTel is of the view that both alternatives would not be well-received by this group of customers.
- 3.7 SingTel therefore submits that the IDA should maintain status quo at this time, i.e. adopt Option 4.
- 3.8 In relation to the IDA's view on the increase in public concerns about personal data protection, SingTel's view is that the passage of the Personal Data Protection Bill and the introduction of the Do-Not-Call Registry will address such public concerns. In fact, these measures have a wider scope that covers more than just personal data made available via the Directory Services. Customers with concerns about the protection of their personal data should consider the use of such measures; this is a separate matter from the IDA's review of the Directories Requirements.

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

3.9 SingTel submits that the IDA should maintain status quo at this time, i.e. adopt Option 4.

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

3.10 SingTel submits that it is imperative that the confidentiality of customers who subscribe to the number unlisting service is maintained, and that information is not released to third-parties. If the database of such customers is not properly maintained and managed, customers will be shocked to find out if their confidential information becomes publicly available.

3.11 SingTel incurs costs on an on-going basis in providing the number unlisting service to its customers, e.g. handling of calls from customers or the public, checks to ensure that customer information is not released to Global Yellow Pages Ltd, etc. Hence, it is only fair and reasonable that SingTel charges those customers on an on-going basis for the provision of this service.

3.12 SingTel therefore submits that fixed-line operators should be allowed to continue charging its customer for the number unlisting service.

***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).***

3.13 Under the current regulatory requirements, customers' information is included in the directory services database on an opt-out basis. It is neither fair nor reasonable to now require SingTel to obtain customers' consent on an opt-in basis. This will involve substantial resources to contact each customer, obtain the customer's consent or the customer's withdrawal from the database and to update the information accordingly.

- 3.14 Should the requirement be on an opt-in basis, it is highly unlikely that residential customers will make the necessary effort to contact SingTel in order to include themselves in the database. SingTel is of the view that even business customers may not take the effort to include themselves in the database as there are other alternatives for business customers to remain searchable. The likely result is that the directory service database will be incomplete and will not serve its purpose of allowing customers to search for directory information.
- 3.15 SingTel therefore submits that customers should continue to be included on an opt-out basis.