



10 December 2012

Infocomm Development Authority of Singapore
10 Pasir Panjang Road
#10-01 Mapletree Business City
Singapore 117438

Attention: Ms Aileen Chia, Deputy Director-General (Telecoms & Post)

Dear Madam,

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

We refer to the Consultation Document issued by IDA on 18 October 2012.

We thank you for the opportunity to present our views and comments which are as follows:

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.

We are of the view that the integrated directories continue to be relevant in today's environment based on the following factors:

1. Collection of the integrated directories has increased since 2009 when self-collection was first introduced at Community Centres.

The collection of integrated directories has NOT declined significantly over the recent years. In 2009, self collection of the integrated directories by subscribers was first introduced at Community Centres. Collection of the English language integrated directories has in fact increased by 13.7% in 2010 from 2009 and decreased by only 3.4% in 2011 from 2009. Collection of the Chinese language business directory has in fact increased by 13.8% in 2010 from 2009 and increased by 12.8% in 2011 from 2009. In total for both English and Chinese language integrated directories the numbers have increased by 13.7% in 2010 from 2009 and remained constant in 2011 from 2009. This clearly demonstrates that the demand for the integrated directories is stable and constant supported by a core group of print directory users who will be adversely affected if the printed directories are discontinued.

2. International studies show that more people search via Print (41% Print only vs. 32% Online only).

Source: Roy Morgan Single Source Australia; Average monthly unique users January to December 2008. Base - Australians 14+ years.

For Singapore we believe that our aging population will continue to rely on Print search as the dominant search medium. As at end June 2012, 10% (378.7k) of total

Singapore resident population (citizens and permanent residents) of 3,818,200 are older than 64 years. Between 60 to 64 years, there is another 5.6%, 55-59 years another 7.1%, 50-54 years another 8.1%. This makes up 30.8% of Singapore residents who are 50 years and older and this is expected to increase over time.

3. Concerns about the Personal Data Protection statute do not warrant the discontinuation of the integrated directories.

We are of the view that concerns relating to the impact of the new Personal Data Protection statute do not warrant the discontinuation of the publication of the integrated telephone directory. This is because when the new law takes effect, telcos and publishers of telephone directories in Singapore will be required to secure the consent of telephone line subscribers to collect, use and disclose their contact numbers – this would include disclosure of these telephone numbers in an integrated telephone directory. Telephone subscribers who do not wish to have their contact numbers published in the directory can with-hold their consent accordingly. In addition, telephone subscribers who wish to shield themselves further from unsolicited telemarketing phone calls can request for their telephone numbers to be entered into the Do Not Call Registry created by the statute.

We are also of the view that the purpose of the Personal Data Protection statute is not to change the current prescriptive framework of regulations which provides an integrated telephone directory that is easily accessible to consumers. What it does is to empower individuals, including telephone line subscribers, with some measure of control over how their personal information may be used by third parties. That some might choose not to allow their telephone numbers to be included in the integrated directory does not mean that telephone directory facilities should not be made available to the rest of the public.

4. Survey of users from 2012 integrated directories collection exercise

We will be collating the responses from users of the integrated directories during the 2012 integrated directories collection exercise in December 2012 and January 2013 which will be a comprehensive representation of the latest views of the usefulness of the integrated directories and will submit these for IDA's consideration in February 2013.

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.

Our preference is Option 4 which is to retain the status quo to have printed or electronic directories available to users on request with a slight variation that subscribers be given the option to opt out of the directory without charge. GYP would be willing to be the registry for this without charge. We note that this is the position taken by the United States and the European Union as stated in paragraphs 17 and 19 of the IDA Consultation Paper. We believe that the regulatory requirement for telcos to provide integrated telephone directories is necessary to achieve valuable social objectives that would not otherwise be achieved if this was a purely commercial decision by the telcos operating on market-based principles.

The integrated directories are an important and convenient source of information for a small, but significant, part of the population. Leaving it to the telcos to decide if it is commercially viable to produce such directories, and how much to charge for directory-related services, would be harmful to consumer welfare in the following ways.

1. Genuine consumer demand for free-of-charge access to telephone directories will be adversely affected

The continued collection of the print directories in substantial quantities demonstrates that there is still substantial consumer demand for this medium of search. Also there are significant segments of the population, particularly those unfamiliar with internet and mobile telephone technologies, who regard telephone directories as necessary reference tools. These groups of users include the most vulnerable communities for whom a fee charging directory enquiry service only is not a viable option. Members of the community for whom access to a free-of-charge comprehensive telephone directory is important include:

- (1) handicapped and able-bodied persons lacking the ability to effectively communicate by verbal means to make use of directory enquiry services (eg there are an estimated 410,000 residents in Singapore who suffer from hearing impairment. Source: WK Low. Managing Hearing Loss in Children and Adults: Singapore Context. Ann Acad Med Singapore 2005; 34:295-300.);
- (2) financially-strapped individuals and families;
- (3) charities, social service providers and voluntary welfare organizations;
- (4) the technologically unsavvy;
- (5) those who do not have easy access to the internet;
- (6) the elderly - Singapore residents who are 50 years and older make up 30.8% of the total resident population and this is expected to increase over time;
- (7) when users are in places that do not allow the use of smart telephones;
- (8) tech savvy users who prefer to use the print directory for search purposes;
- (9) caregivers of children seeking to locate and contact those who have a legal obligation to pay maintenance.

2. Advantages of the integrated directories over directory enquiry services will no longer be available

Printed telephone directories possess a number of characteristics that are not associated with directory enquiry services. They are not substitutes for each other. Firstly, the printed telephone directory is available to end-users free of charge compared to the per-use charges levied by directory enquiry services. Secondly, as a reference tool to locate particular individuals, the printed telephone directory is a reference tool that can be consulted offline without incurring telephone-line charges. Thirdly, end-users of printed telephone directories do not need to know the exact way in which an individual's or business name is spelt, or pronounced, when searching through a printed telephone directory and would have to pay again if the name is incorrect. Fourthly, the charges for the directory enquiry service will increase over time and put an ever increasing cost burden on consumers.

3. Comprehensiveness of users search experience will be diminished as integrated directories and directory enquiry services are complementary products

Printed telephone directories and directory enquiry services can and should continue to co-exist with each other as part of a comprehensive information resource framework for consumers who want, or need, to have alternative sources to obtain the contact details they require. Without the requirement for the integrated directories, residential contact information which are not available to users online, can only be accessed, one entry at a time, through the fee charging directory enquiry service.

Apart from residential telephone contact information, consumers may also face obstacles in gaining access to business telephone contact information if it is no longer mandatory for telcos to publish printed integrated telephone directories. Not all business telephone contact information is available online. Where such contact details are available online, the telephone numbers may not be up to date (unlike periodically published printed directories) and may not be accessible to those without the necessary hardware and technological skills.

4. Providing integrated print directories is pro- consumer and pro-choice

Preserving consumer choice is important and this can only be effectively achieved through regulation. Removing the requirement for printed directories is taking away the ability of consumers to make a choice when making a directory search. Providing the integrated directory in multiple platforms provides the consumer with choice and the potential to reap welfare gains from having a range of different information access channels. Ultimately, the most vulnerable and disadvantaged consumers will bear the brunt of this proposed change in IDA's printed directory policy and such an unsatisfactory outcome would run contrary to the Singapore government's declared objective of building an inclusive society in which the interests of all members of society (including those reliant on print directories to access telephone contact information) are protected.

5. Investment cost of maintaining an Integrated Database will not be maximized

As telcos continue to be required to maintain an Integrated Database of the contact details of all members of the telephone network for the directory enquiry service, it makes economic sense to continue making these directories accessible on multiple platforms – in print, in electronic form, or via an enquiry service system – so as to maximize the value generated from the telcos investment in compiling and maintaining the Integrated Database.

6. There are no substitute residential listing directory available in the marketplace

IDA's Consultation Paper cites that there are private entities offering directories commercially. We would like to point out that these private commercial directories are for business listing information and not for residential listing information. Removal of the regulation to require integrated directories will mean that there is no other source available for residential listing information except for the directory enquiry service thereby effectively creating a monopolistic environment for this information.

7. Removal of the integrated directories requirement will gradually erode the comprehensiveness and accuracy of commercial business listing directories thereby limiting their relevance and useful life

Currently the Integrated Database represents the most comprehensive and accurate business listing information available. Removal of the requirement to print this information will mean that this information will no longer be required to be made available publicly. This will therefore gradually erode the comprehensiveness and accuracy of existing commercial business listings directories causing their relevancy and useful life to be limited.

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

None.

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

We are in support of this proposal.

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).

Our view is to follow an opt-out basis which is similar to the DoNotCall registry which requires the consumer to explicitly request to be registered.

In summary, for the reasons stated above, we strongly advocate the retention of the status quo, Option 4, "Retain status quo, i.e., retain regulatory requirements for integrated directories and directory enquiry services for both residential and business numbers"

Yours faithfully,
Global Yellow Pages Limited



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