

Mr Andrew Haire
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 Infocomm Development Authority
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Singapore, 2007-06-05

Dear Mr. Haire,

SUBJECT: FEEDBACK TO DRAFT CODE OF PRACTICE FOR PROVISION OF PREMIUM RATE SERVICES

We are glad that IDA has planned to introduce a new Code of Practice for the Provision of Premium Rate Services in Singapore. We believe this is an important and necessary step for the continuous growth of the mobile service industry.

Having reviewed the draft Code Practice, we have the following feedback:

Section Number	Topics	Feedback
2.5.2a	If subscription period is longer than 7 days, service provider needs to send additional reminder message at least once a week.	<p>In Singapore, there are premium rate service providers who offer bi-weekly, monthly or evenly yearly subscription services. We believe that the proposed guideline will result in the following issues:</p> <ol style="list-style-type: none"> 1. Service providers need to send many SMS reminder messages to the end-users, increasing the cost of service provision. This will make it economically not viable to offer low cost monthly subscription services via premium SMS. 2. Excessive SMS reminder messages can be a nuisance to end-users. For example, it can be annoying for a monthly service subscriber to receive 4 reminder messages per month. <p>One may argue that since that IDA allows the possibility for users to opt out of reminder messages, the above should not be a concern. However, we believe most Singaporeans are efficiency conscious and overlook such option during service registration. When annoyed by too many reminder messages, the subscriber</p>

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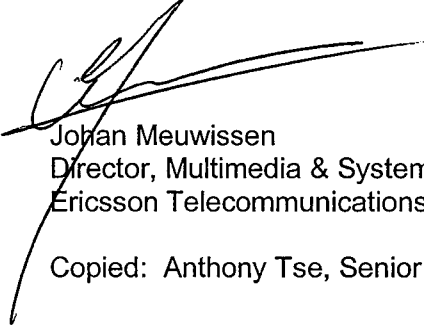
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		<p>will likely quit the service rather than spend extra effort to turn off the reminder option.</p> <p>We recommend sending a notification 24 hours prior to charging the subscriber should be generally sufficient. For subscription services that are of longer duration (e.g. 2 wks, 1 mth, etc.), 48 hrs advance notification will be recommended.</p>
2.10.3	Name of Service Provider as registered with ACRA should be stated in Subscriber's phone bill	<p>Ericsson believes that it is important to bring strong and innovative overseas mobile services providers into Singapore to promote the growth of the mobile service industry in Singapore. These overseas service providers do not have local presence, so their services will need to be covered by Ericsson's SBA license. When these service providers advertise their services in Singapore, they will understandably put emphasis on their own brand. Even though "SMS provided by Ericsson Telecommunications" will be prominently displayed, it is unrealistic to expect the end-user to remember the name Ericsson rather than the content provider's brand.</p> <p>When the Code makes it compulsory to print licensees' registered name rather than the overseas service provider's name on the phone bill, there is a high tendency that the end-users will get confused, triggering to end-users to complain to the operators or the licensee's service hotline. As a result, end-user satisfaction will drop and licensees' cost of operation will unnecessarily increase.</p> <p>We propose that IDA can allow the actual content provider, regardless of whether they are based locally or overseas, to have their own names printed in the phone bill.</p> <p>Our thought behind this proposal is - since mobile operators usually have a detailed set of such directory, they will then be able to identify licensee should there be any complaint escalation..</p>
2.12.5a	1 Year Dispute Period	<p>Considering that the great majority of the post-paid subscribers receive their phone bills on a monthly basis. As for prepaid subscribers, any premium charge is deducted immediately, and hence also will not require such long dispute</p>

		period. We believe an allowable dispute period of 6 months should be sufficient.
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Please feel free to contact us if you need clarification on any of the points raised above.

Best regards,



Johan Meuwissen
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Ericsson Telecommunications Pte Ltd

Copied: Anthony Tse, Senior Sales Manager, Ericsson Telecommunications Pte Ltd