

M1'S RESPONSE TO MDA'S CONSULTATION PAPER ON REVIEW OF CONSUMER PROTECTION MEASURES IN MEDIA MARKET CONDUCT CODE



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Section/ Paragraph Number	Description	Comments
PART II of MDA's Consultation paper Section 2.4	Option to Exit without ETCs due to: a. An increase in subscription fee b. A removal of channel(s) c. A removal of material content within a channel	<p>Allowing the recovery of reasonable costs associated with early termination enable providers to continue to offer competitively priced fixed term service contracts.</p> <p>For greater clarity, we seek confirmation on the following:-</p> <p>(i) With regard to subscription of paid content, it does not come with an ETC condition. Customers are free to opt-in the subscription of paid content at any time and opt-out on a monthly basis. For such cases, the proposed measure should not be applicable; and</p> <p>(ii) For complimentary content, the service provider should reserve the right to change or remove the provision of such complimentary content as this is dependent on commercial arrangements with respective Content Providers. Accordingly, customers ought not to be given the option to exit without ETCs for scenarios (b) and (c) with regards to complimentary content and/or channels.</p>
PART II of MDA's Consultation paper Section 2.6	Disclosure Requirements	<p>From a practical standpoint, it will be too onerous to have to list all content within a channel and go through individually with the customer. It will lengthen the service time substantially as well as waiting time for other customers. As the content information is accessible online, it should be reasonable to only go through the key content with customers upon their request.</p>
	Retention of Marketing Materials	<p>Currently, marketing material is provided to MDA upon request. Such records generally need not be kept longer than necessary for business purpose or to manage potential disputes. We would recommend to allow discretion on records retention based on individual business operational requirements.</p>