

Stanton, Emms & Sia

Strategic International Business and Marketing Consultants

10th May 2011

TO WHOM IT MAY CONCERN

Dear Sir or Madam,

Further to our letter of apology to our clients and other contacts regarding our telephone and fax service outage dated 6th April 2011.

It has, this week, come to our attention that a small number of our business contacts, including one of our banks, were told by Singapore's telephone directory enquiry staff that we had terminated our main telephone number due to the closure of our office. We have today been advised by IDA that Singapore's telephone directory enquiry service is run by SingTel.

This occurred during the time that our main phone line was not working because of the unauthorised termination of our phone number and our telephone account by our telecommunications service provider, SingTel (full name Singapore Telecommunications Limited) on the instructions of a person who is still, at the time of writing, not known to Stanton, Emms & Sia, its management, its staff or its close business associates.

As we currently do not know how many contacts were provided with incorrect information by SingTel's telephone directory enquiry staff, we would like to clarify in writing to any contacts that tried to ring us during the service outage caused by SingTel's erroneous actions that our office was not closed, nor did we terminate our phone or fax numbers. At the time of the service outage that affected our main phone number, we were still operating in the manner that we are today, and were before SingTel's breach of contract with us.

As an update to our letter of 6th April 2011, SingTel has now missed its three self-imposed deadlines to provide us with full information about the person who authorised SingTel to terminate our phone, fax and telephone account. In view of this, and following strong written warnings to SingTel not to miss any further deadlines to supply us with information, we have now issued a detailed formal complaint to the Infocomm Development Authority of Singapore (IDA) against SingTel and its two CEOs titled as follows:

“Formal complaint to the Infocomm Development Authority of Singapore about SingTel's breach of its duties under its Licence to Provide Facilities-Based Operations, the Telecommunications Act and Related Codes of Practice, Standards, Guidelines and Best Management, Internal Control, Accounting and Service Practices”.

This formal complaint of around 100 pages was issued in two parts, one on [2nd May 2011](#) and, the other, on [6th May 2011](#) and covered the following matters:

- Complaint 1: Singtel permitted an unauthorised person to terminate our phone and fax numbers on 23 March 2011;
- Complaint 2: Singtel failed to apply any financial and other forms of controls over account closures when it permitted the termination of our phone and fax number on 23 March 2011;
- Complaint 3: Singtel failed to act in a reasonable, responsible and service-like manner to a longstanding customer when it permitted the termination of our phone and fax numbers on 23 March 2011;
- Complaint 4: Singtel formally closed our account number 88128281 on 7 April 2011, which was 2 days after they had been informed by Stanton, Emms & Sia on 5 April 2011 to cease and desist in their activities to terminate this account;
- Complaint 5: Singtel issued a cheque to Stanton, Emms & Sia on 7th April 2011, which was received by us on 10th April 2011. This cheque was issued in payment of the balance due to us on our account number 88128281 irrespective of the fact that Singtel was advised orally and in writing on the 5th and 6th April 2011 to cease and desist in the termination of our account number 88128281;
- Complaint 6: Based on information provided to us by Singtel's staff in the period 5th to 7th April 2011 there were some unusual erroneous information in Stanton, Emms & Sia's entries in the customer database that Singtel's staff had access to in the period;
- Complaint 7: Singtel did not issue a letter of notification of phone number and account termination to Stanton, Emms & Sia on 23 March 2011;
- Complaint 8: Singtel did not provide us with three (3) days written notice of its intention to terminate our phone services in line their standard terms and conditions;
- Complaint 9: Singtel did not act in good faith or in line with its duties to its customer under its contract when it terminated our phone and fax services;
- Complaint 10: Singtel's lack of immediate, decisive, professional and customer-oriented response to our complaint on 5 April 2011;
- Complaint 11: Singtel has taken an unreasonable amount of time to deal with a very important customer complaint and release critical information to Stanton, Emms & Sia;
- Complaint 12: Singtel set 3 self-imposed deadlines to provide the account termination documentation to Stanton, Emms & Sia and, in all cases, failed to meet the deadlines;

- Complaint 13: Singtel does not appear to have applied best practice in terms of archiving the important hard copy records of its branches when they are under renovation and this situation has led to unreasonable delays in Singtel providing us with a copy of the account termination documentation that was signed and submitted by the said Jessie Woo when our incoming phone and fax number services were terminated by Singtel in breach of contract on 23 March 2011;
- Complaint 14: The effectiveness of Singtel's own phone and email based communication system in an emergency situation for a customer in distress and with immediate demands for high quality service from a decision-maker with Singtel; and,
- Complaint 15: Singtel's management and internal control functions over its customer database system may be substandard, and so have provided risks that there are weaknesses in protection of Stanton, Emms & Sia's End User Service Information (EUSI) from actual (possibly part of the 23 March 2011 breach of contract incident) or potential risks from unauthorised usage as is necessary under consumer data protection requirements, including that under Section 3 of the Code of Practice for Competition in the Provision of Telecommunication Services 2010

In view of SingTel's management team's intransigence towards our complaint, we decided to follow up on what happened with SingTel's operational staff, who, unlike the company's management, were more than happy to assist with our enquiries. Our follow up investigation focused on what happened in SingTel's systems that led to its breach of contract with us, to it erroneously terminating our phone number and telephone account, and to the wrong information provided to some contacts by SingTel's phone directory enquiry service staff. This information, together with information from other sources, was used to develop our above complaints to the IDA.

A copy of our covering letter for our complaint of 2nd May 2011 is available here: [Letter of Complaint About Singtel to IDA \(2 May 2011\)](#). A copy of our letter regarding the additional complaint submission of 6th May 2011 is available here: [Additional Letter of Complaint about Singtel to IDA \(6 May 2011\)](#).

We are unable to tolerate SingTel's actions, inclusive of its very negative attitude and appalling behavior towards a customer, as described above, because of the damage that it has done to our international connections and business since it breached its telecommunications service contract with us. This incident and its spin off effects have been highly traumatic for us, which is why we have issued a robust and detailed complaint to the IDA.

We are now hoping that this complaint will result in us discovering in a very speedy manner who authorised the termination of our main phone number, which:

- resulted from an evident cascade of errors in SingTel's integrated systems, and, also,
- led to a small number of our business contacts being incorrectly informed by SingTel's staff that we had terminated our phone numbers and closed our office.

Finally, I would just to reiterate our apologies to anyone that tried to contact us while our main phone and fax numbers were not operational. We have been operating with very high service standards over the past 20 years and will certainly continue to operate in such a manner into the long term, irrespective of the challenges that errant service providers, such as SingTel, throw at us.

Yours sincerely,

Anthony L. Emms
Managing Partner
Stanton, Emms & Sia
Singapore
10th May 2011