



**Telecommunications Legislation  
(Unsolicited Communications) Bill 2019**

**Senate Standing Committee on Environment  
and Communications Legislation Committee Inquiry**

**Submission By**

**Apple Marketing Group Pty Ltd  
February 2020**



## Response Summary

Apple Marketing Group Pty Ltd (Apple) recommends that the Senate Committee **reject** the proposed amendments to the Do Not Call Register charity exemption on the grounds that:

- We are a proud Fundraising Institute of Australia (FIA) Organisational member, we adopt the self-regulating and best practise guidelines and our team have completed the relevant code of conduct training,
- Our 23 charity clients are financially dependent on ethical telemarketing in order to continue funding vital services to meet their vision and mission,
- Opt in and Opt out mechanisms, process and procedures are adopted to ensure the prospect has every opportunity to update the request and frequency of telephone contact,
- By applying the processes from the above point, we have seen an average reduction in prospects opting out of telephone by up to 85%,
- In 2016, we washed nearly 654,000 telephone numbers to identify those on the Do Not Call Register vs. those not registered. Over 77% of numbers appeared on the DNC register. Over a two-month period we segmented the records and found the prospects registered on the DNCR were as receptive to leaving a gift or purchasing a raffle ticket to those not registered (see results Table 1),
- Complaints made against our organisation to ACMA are almost non-existent. Since applying more appropriate Opt in and Opt out options we have not received a complaint (nearly 14 months)
- Should the senate committee accept the recommendations, our job losses would be greater than 50% and
- Our global do not call register, unlike the Governments DNCR, does not have an expiry date for phones numbers registered. The current number of phone numbers is just over 73,000. And on average we make approx. 300,000-400,000 calls per month.

**If the Senate Committee approve the decision and apply the amendments, an expected 77% of available data would be suppressed from fundraising calls (based on our 2016 test).**

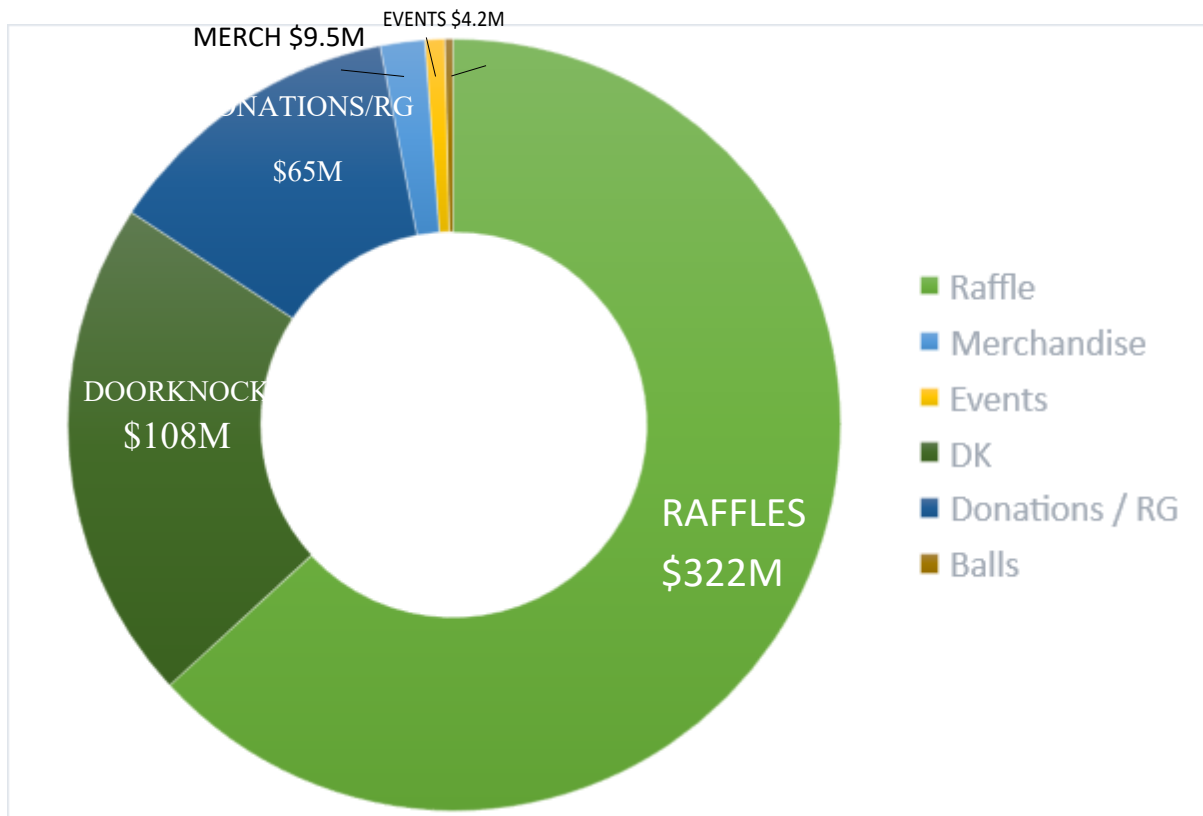
**Further, we endorse the submission's lodged by the FIA and our client Parkinson's' NSW.**



**Our vision** is to provide charities with a sustainable fundraising solution and be the ‘Champion for Charities’.

**And it’s our mission** that through collaboration and innovation, we become Australia’s leading charity fundraising company

**AND we have raised \$510M** for Australian Charities



## About Us

Celebrating 35 years and raising over \$510M for our Australian Charities, Apple Marketing has developed fundraising strategies that support the vital work of charities, including medical research, social services, health, disability and mental health institutions.

Proudly Australian owned and operated providing local jobs for local people. Apple Marketing’s experience, foresight and innovation continue to shape Australia’s fundraising industry, particularly in the areas of acquisition and retention.

As Apple Marketing looks to the future of fundraising, integration of digital fundraising approaches such as online donor engagement and bespoke regular giving packages that are crucial for a sustainable charitable sector.



**DNC RESULTS TABLE 1**

Not on DNC

Said Yes Raf	Said Yes Don	Said No
2928	363	127409
<b>2.02%</b>	<b>0.25%</b>	<b>87.96%</b>
<b>2.24%</b>	<b>0.28%</b>	<b>97.48%</b>

**On DNC**

Said Yes Raf	Said Yes Don	Said No	
10090	1723	461342	
<b>1.98%</b>	<b>0.34%</b>	<b>90.61%</b>	<b>total calls</b>
<b>2.13%</b>	<b>0.36%</b>	<b>97.50%</b>	<b>conversations</b>
-0.11%	0.09%		

Customers who requested no more calls

OnTheDNCRegister	StatusCode	(No column name)
N	N	47
Y	N	199

**Selection**

**Phone numbers**

**653992**

**DNC Y**

**509144**

77.85

DNC N

144848

28.45