

7 June 2006

Committee Secretary  
Senate Environment, Communications, Information Technology and the Arts Committee  
Department of the Senate  
PO Box 6100  
Parliament House  
Canberra ACT 2600  
Australia

Email: [ecita.sen@aph.gov.au](mailto:ecita.sen@aph.gov.au)

**Re: Inquiry into the provisions of the Do Not Call Register Bill 2006**

I write in response to the above Inquiry. As a member of the Australian Direct Marketing Association and an organisation that conducts responsible telephone marketing practices, I would like to support the submission made by the Association in relation to the provisions of the Do Not Call Register Bill 2006.

Accor Première Vacation Club (APVC) is Australia's largest hotel branded timeshare/holiday ownership resort system. A joint venture partnership between Accor and the Becton Corporation, APVC was registered as a Managed Investment Scheme with the Australian Securities Investment Commission (ASIC) in October 2000 and holds an Australian Financial Services Licence. Employing more than 500 Australians, the Club has grown to over 15,000 Members enjoying 14 Club Owned Properties. A further three locations are proposed for the Asia-Pacific region in 2007.

APVC is a member of ATHOC (the Australian Timeshare and Holiday Ownership Council), ARDA (the American Resort Development Association), the OTE (Organisation for Timeshare in Europe) and ADMA (the Australian Direct Marketing Association). In addition, APVC has affiliate agreements with Interval International, the quality Vacation Exchange Network, and ICE, the private resort and cruise club. APVC also has promotional partnerships with numerous organisations throughout Australia.

APVC markets its product through various nationwide contests and promotions as well as personal contact programs, direct mail, "try before you buy" mini-holiday programs, inbound and outbound telemarketing and the internet. A significant portion of APVC's business comes from Member Referral programs and the purchase of additional Premiere Points™ from existing Members.

An Accor / Becton venture AFSL#245515

APVC Building, Level 2, 14 Edgewater Court, Robina, Qld 4226, Australia  
PO Box 3755, Robina Town Centre, Qld 4230, Australia  
Tel 61 7 5595 3200 Fax 61 7 5593 0066 Web [www.apvc.com.au](http://www.apvc.com.au)

For the reasons outlined in ADMA's submission, the Bill, as currently drafted, will significantly hinder the ability of APVC to; effectively service our existing Members, respond to requests for marketing information and conduct responsible telephone marketing.

As an advocate of responsible telemarketing practices APVC supports the introduction of a national Do Not Call Register and of standards for the telemarketing industry. APVC submits that the amendments proposed by the Association are essential to ensure the legislation can deliver on its objectives – i.e. to provide individuals with the choice whether or not to receive future unsolicited telephone calls and to provide a more consistent and efficient operating environment for the telemarketing industry.

We would welcome the opportunity for further consultation as this matter progresses and would ask to be kept abreast of future developments.

Yours sincerely,



Martin Kandel  
Chief Executive Officer