

**Response to statement of policy on the persistent misuse of an electronic communications network or electronic communications service.**

*Q1 Do you agree that consumers are concerned by silent calls and that Ofcom is right to take enforcement action against the companies that make them?*

Answer: Silent calls are more than a nuisance and inconvenience to many people. They can cause anxiety and fear. As I understand it, if an individual can be identified as making such calls on a regular basis, they can be prohibited by law from making silent calls. We believe that Ofcom is right to take action.

*Q2 Do you agree with Ofcom's proposed approach to taking enforcement action, guided by a sense of administrative priority?*

Answer: ALL silent calls are wrong – a limit of 3% would still allow a large number of calls to menace consumers.

We find it astonishing that companies would employ software that dials more numbers than there are available agents; either the software is rubbish or the companies are not using it correctly! In the event that suitably skilled analysts and programmers are not available, then a recorded message giving details of the call must be left.

A 72-hour period of no call back is reasonable.

CLI information on outbound calls is a must, as long as the consumer is not charged for requesting not to be called again; after all, the consumer is not to blame for the nuisance.

A minimum 15-second ring time is reasonable.

We understand that some companies feel that to leave a message detailing the reasons for a silent call may breach confidentiality or upset their customers, but the answer is simple – don't make silent calls!

Some companies maintain that to enforce tight regulations could lead to more use of overseas call centres. We do not know whether a UK-based concern could circumvent the regulations by using offshore centres; if so, the regulations need to cover this loophole. Of course, any company that did this would show an appalling and reckless disregard for the consumer.

Silent calls resulting from number-scanning ('pinging') cause just as much annoyance and anxiety as those from call centres, and should be subject to the same regulations.

*Q3 Do you agree that the range of procedures proposed in the statement will be effective in reducing the degree of anxiety, annoyance and inconvenience caused by silent calls?*

Answer: We think that the proposals should be amended according to the answer to Q2, above.

*Q4 Are there any additional procedures which call centres could adopt to reduce the degree of anxiety, annoyance and inconvenience caused by silent calls?*

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Answer: Undoubtedly yes, if there was the will to do so. We do not believe, however, that call centres will voluntarily move to 'clean up their act'.