

-----Original Message-----

**From:** Anthony Impey [mailto:aimpey@optimity.co.uk]

**Sent:** 13 January 2006 6:40 PM

**To:** Frank Phillips

**Subject:** RE: Public Consultation on Outbound Calls

Anthony Impey

Optimity

As a director of a telecoms consultancy, I see at first-hand how medium-size companies use telephony to drive the growth of their businesses. Outbound marketing telephony is an important component of new business generation for these organisations. My experience is that these companies use outbound telephony responsibly. They are acutely aware of how poor marketing practices very quickly undermine their proposition to market and destroy the integrity of their brand. As a result their approach is usually sophisticated, and relies on using good quality, targeted call data with people who are able to articulate their customer proposition. The result drives a significant source of new business. To impose a blanket ban on outbound marketing telephony will have a serious impact on the ability of these companies to generate new business. Since small- to medium-size companies make up such a significant proportion of the UK business economy, the macro implications of an outright ban must not be underestimated.

This is not to say that the use of 'power-diallers' which generate the silent calls should be, in anyway, tolerated. Their use has created an irritating (at best) and menacing (at worst) edge to a fundamentally important marketing tool. This does not mean that the marketing tool is to blame. The source of blame rests with those that abuse it in the name of productivity savings- savings so marginal that only those companies that make thousands of calls every day can realise any material benefit. If outbound marketing telephony is banned, these companies will simply retrench and find another way to market their services. The rest of the business community that rely on it to generate growth are unlikely to be able to reposition their strategies with such ease, meaning that the full force of the ban will be felt by everyone other than those that instigated the it.

At the same time, rogue operators will continue to employ the technology. More significantly, I presume that overseas companies will fall outside of the jurisdiction of any ban. In our ever-shrinking global economy, this is going to represent an increasingly high proportion of marketing telephony activity that will continue regardless.

In light of this, I think Ofcom needs to impose some very clear guidelines, for both the telecoms industry and end-users. There needs to be a very clear structure that defines what can and can't be done and the penalties for failing to observe these guidelines need to be immediate, material and absolute. The result will be the abandonment of the technology that causes silent calls, without having to impose what I believe would be a hugely damaging outright ban.