



**Ofcom Consultation
On
Statement of Policy on the Persistent Misuse of an
Electronic Communications Network
or
Electronic Communications Service**

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NOC Response

The Network for Online Commerce (NOC) is a not for profit trade association that exists to promote and facilitate profitable enterprise in Telemedia markets around the world and we welcome the opportunity to comment constructively on the captioned Ofcom Consultation.

General

While this Consultation focuses on ‘silent calls’ and associated call centres it is clear that the principle of network misuse might equally apply in other areas, notably Premium Rate Services (PRS) through misuse of allocated numbers and/or the use of Automated Calling Equipment.

The NOC welcomes initiatives to ensure the responsible use of Telecommunication Networks and the associated numbering resource and will support all reasonable measures to protect consumers and responsible service providers from damage caused by misuse.

To take the Specific questions in turn:

Question 1

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 1

Yes. We agree.

Question 2

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

Answer 2

Yes, We agree but with the proviso that any policy is co-ordinated with regulatory provisions for PRS activated between Ofcom and ICSTIS.

Question 3

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

Answer 3

Yes, we believe there is a good chance of their being effective.

Question 4

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

Answer 4

It would be useful if call centres were required to periodically publish their achieved performance statistics associated with the stated procedures.

The NOC and its members look forward to continuing good and constructive relations with Ofcom and offers its co-operation and assistance in any future discussions on this subject.

Regards

Neil Penny
Chairman NOC UK

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