

Title:

Mr

Forename:

Neil

Surname:

Matthews

Representing:

Organisation

Organisation (if applicable):

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What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Additional comments:

Question 1: Do you agree that Ofcom should limit the number of times a company can call an answer machine without guaranteeing the presence of a live operator to once every 24 hours?:

YES - the current ruling of 72 hours relates to where there is an abandoned call, in effect under the OFCOM guidance calls that are cut off due to detecting an answer phone are not generally abandoned calls – so in theory a call centre can call as many times as it wants and leave as many missed calls as it wants – this has the effect of annoyance similar to the silent calls issue. If call centres could only call once every 24 hours, and alternate the timing, then less anxiety would be caused to the consumer, and less damage to the industry. I am not convinced that productivity would be greatly affected.

Question 2: Do you agree with Ofcom that a two month implementation period (from publication of Ofcom's revised statement) would be an appropriate length of time for industry stakeholders to adopt any changes to comply with the proposed 24 hour policy?:

Yes – this seems very reasonable period of time to allow

Question 3: Has Ofcom provided sufficient clarity on how the abandoned call rate is to be calculated?:

Yes – we don't have our AMD operational so calculation is simple, although it does get cloudy if you have to take into account the 'false positive' scenario

Question 4: Do you agree with the factors set out by Ofcom for determining a reasoned estimate of AMD false positives in an ACS user's abandoned call rate?:

No – it is very difficult to determine an accurate 'false positive' this means it is virtually impossible to calculate an accurate abandoned call rate whilst using AMD – having the effect of banning the use of AMD whilst actually not making it illegal to use AMD.

Question 5: Has Ofcom provided sufficient clarity on how AMD users should calculate an abandoned call rate that includes a reasoned estimate of AMD false positives?:

No – as explained in 4 above to determine a reasoned estimate is extremely difficult and non justifiable in complaint managing.

Question 6: Has Ofcom provided sufficient clarity on how non-AMD users should calculate an abandoned call rate that includes an estimate of abandoned calls picked up by answer machines? :

Yes it has

Question 7: Do you agree that Ofcom should not amend the existing two second policy as set out in the 2009 Amendment from 'start of salutation' to 'end of salutation'?:

Yes – the industry is working with this quite effectively and we don’t want change for change sake.

Question 8: Do you agree with Ofcom's policy proposal that companies provide a geographic contact number (01, 02 or 03) in addition to a freephone (080) number in the information message provided in the event of an abandoned call?:

No – this seems of very little benefit to the consumer

Question 9: Has Ofcom provided sufficient clarity on what constitutes a 'campaign'?:

Yes – this is quite clear