

REVIVE MANAGEMENT SOLUTIONS LIMITED RESPONSE TO OFCOM CONSULATION OF 1st OCTOBER 2014: Persistent misuse - silent and abandoned calls

A. Overview

This document provides the response from Revive Management Solutions Limited (**Revive Management**) to the consultation paper written by Ofcom on 1st October 2014: Persistent misuse - silent and abandoned calls.

Revive Management is a provider of cloud based customer experience, customer contact and contact centre solutions. The majority of Revive Management clients are in the Energy Utility, Water Utility and Financial Services markets and use the services for proactive credit management and collections, proactive customer care and customer satisfaction surveys.

B. Why our clients use automated calling systems

Automated calling systems, namely interactive voice messaging systems are used by our clients to provide a better customer experience for their customers. This creates efficiencies to the organisation which in turn can provide savings that are passed onto customers. Revive Management, and the client services team, work with our clients to ensure they are always using services that have a positive customer experience.

The solutions our clients use with interactive voice messaging are for the benefit of the consumer and provide a great customer experience. Customer contact solutions in the main consist of:

- Appointment Reminders or Delivery Notifications
- Outage notifications e.g. Water out of use or Gas out of use
- Insurance Renewal Reminders
- Payment Reminders
- Customer Satisfaction Surveys

The automated solutions allow our clients to be proactive in their approach to customer care. If consumers were not to receive the above contact from the trusted organisations they get services from, then the consumer would receive a lesser service and a have poor customer experience.

C. Where Revive Management see misuse

In our view, misuse of automated dialling systems is occurring where organisations actually have no relationship with the consumer. Examples of this include companies (usually SME's) trying to fish for payment protection insurance, debt management and personal injury leads through mass and unsolicited contact. Another example is competition companies, again trying to gather entrants into a competition through mass and unsolicited contact. When consumers don't have a prior working relationship with an organisation is where organisations are misusing automated dialling systems and consumers are getting harmed from nuisance calls.

D. What should be done

Consumers have the opportunity to report nuisance calls to Ofcom and the ICO and with this information the companies providing the automated dialling system and the companies using the automated dialling system should be investigated to determine whether deliberate misuse is occurring.

RESPONSES TO QUESTIONS

Q1:

We would welcome views and evidence from stakeholders on (a) the main types of harm that consumers experience from nuisance calls in general and specifically in relation to silent and abandoned calls; and (b) how to measure the harm.

Response:

Nuisance calls generally seem to come from unsolicited sales and marketing where the consumer has no prior relationship with the organisation that is using the automated calling system. In the main, these calls are of no benefit to the consumers.

Q2:

We would welcome views and evidence from stakeholders on what are the key drivers of (a) silent calls and (b) abandoned calls.

Response:

The key drivers for silent calls is the deliberate and intentional misuse of an automated dialling system by companies carrying out unsolicited sales and marketing. Reputable organisations that use automated dialling systems are very aware of the regulations and fines that can be imposed by Ofcom. They have dedicated roles within the organisation who continually monitor that they are working within Ofcom guidelines and industry best practice.

Q3:

We would welcome views and evidence on the use of AMD including (a) if call centres have changed their use of AMD in recent years and if so why (b) the volume of calls made by call centres with and without the use of AMD (c) false positive rates when using AMD and any data to suggest that the accuracy of AMD has improved in recent years.

Response:

All clients of Revive Management carry out thorough testing of the AMD technology and are satisfied with the levels of accuracy. Calling strategies are also configured on the platform to ensure the best customer experience .

Q4:

We would welcome views and evidence on potential changes to the policy to help reduce the harm caused by silent and abandoned calls including those identified in Figure 2 (abandoned call rate and approach to AMD), Figure 3 (time limits for calling consumers and connecting to a live agent) and Figure 4 (good management and appropriate processes).

Response:

Revive Management see that the current 3% abandoned or silent call rate is sufficient as set out in the current guidelines. Most organisations now have the ability to play a recorded message for a abandoned or silent call which would state the organisations name, contact details and reason for the call which in turn would not create any concern for the consumer, as a silent call would. Should the 3% rate be reduced or removed completely this would lead to inefficiencies in customer contact and in the long term would be reflected in the price of goods and services, thus not benefiting consumers.

Q5:

We would welcome views and evidence on potential changes that could be made to the policy relating to the a) current five general examples of persistent misuse (misuse of automated calling systems; number scanning; misuse of a CLI facility; misuse for dishonest gain – scams; and misuse of allocated telephone numbers) or b) other examples of persistent misuse.

Response:

Revive Management agrees with Ofcom that a CLI should always be provided when using an automated dialling system and that this telephone number should be able to be called back by a consumer. Rotating CLI's provides consumers the opportunity to call back the telephone number that is best suited for their device. For example it will be more cost effective for a consumer to call a local number from their mobile telephone as opposed to a non geographic number as many of the mobile operators do not include non geographic numbers in the inclusive minutes.

Revive Management clients, and most organisations with a reputable automated dialling system, are able to configure the calling windows within the platform so that calling does not happen during unsociable hours. Most calls within unsociable hours are carried out deliberately by organisations.

Interactive voice messaging, where a consumer can connect to an agent are typically credit management type calls. These type of calls clearly state the organisations name upfront in the call and then provide consumers with options, one of which could be to be transferred to an agent. Other options would include allowing the customer the option to bring their account up to date without speaking with an advisor and thus saving time and any embarrassment therefore are beneficial to the consumer.

Revive Management would welcome Ofcom issuing a check list and/or best practice.

Q6:

We have not identified any significant changes to this section of the policy, relating to the issuing of notifications, at this stage. However, we welcome views and evidence from stakeholders on any changes they consider may improve the understanding or clarity of this section of the policy.

Response:

Revive Management does not have any further comments on this point.

Q7:

We would welcome information on the current operation of the outbound call centre market, in particular:

- **The size of the current outbound calling market e.g. the annual number of calls made as well as the value.**
- **The size of total annual costs in the outbound market (where possible split by operating costs and capital costs (or depreciation)).**
- **The average costs per call/per agent (or per agent hour).**
- **The split of call centre locations (domestic or overseas) that make calls to UK numbers.**

Response:

Revive Management does not have this information to provide.

Q8:

We would welcome any initial views and evidence on the potential costs and benefits of any of the potential changes to the policy. In particular, whether any of the potential changes would:

- **require investment in new technology or other capital costs;**
- **have an impact on efficiency and operating costs;**
- **have an impact on call-centre costs or call-centre prices (to their clients);**
- **affect competition in the call-centre market; and**
- **have a different impact on different types of call centre, and if so, what factors affect the level of impact.**

Response:

Revive Management does not have this information to provide.

Q9:

We would welcome any views on what factors may influence a call centre's likelihood of adhering to the current or a stricter policy.

Response:

Revive Management does not have any further comments on this point.