

## **Additional comments:**

A 0% drop rate would cripple the predictive dialler market.

Although dropped calls can cause concern for the person called, Ofcom are managing nuisance calls with current legislation. With the use of a drop call message and facility for the called person to opt out of future calls this should already minimise the harm to the consumer. The enforcement program that Ofcom has in place should deter call centres from abusing this.

The issue is really about silent calls. Silent calls should be minimised with Ofcom's approach to monitoring and enforcing the rules.

I don't believe it is good for the industry and those that work in it for this rule to be changed to 0% dropped calls.

**Question 1: 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. Please refer to [Annex 4 Call for inputs questions](#) for details of the points you may wish to consider in your response.:**

I can understand silent calls will be a cause for concern for many people who receive them. There is already a penalty in place for companies that do not adhere to the regulations.

**Question 2: We would welcome views and evidence from stakeholders on what are the key drivers of (a) silent calls and (b) abandoned calls. Please refer to [Annex 4 Call for inputs questions](#) for details of the points you may wish to consider in your response.:**

**Question 3: 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.:**

**Question 4: 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). Please refer to [Annex 4 Call for inputs questions](#) for details of the points you may wish to consider in your response. .:**

**Question 5: 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. Please refer to [Annex 4 Call for inputs questions](#) for details of the points you may wish to consider in your response.:**

**Question 6: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 :**

**Question 7:We would welcome information on the current operation of the outbound call centre market, in particular a) the size of the current outbound calling market e.g. the annual number of calls made as well as the value, b) the size of total annual costs in the outbound market (where possible split by operating costs and capital costs (or depreciation)), c) the average costs per call/per agent (or per agent hour), d) the split of call centre locations (domestic or overseas) that make calls to UK numbers.:**

**Question 8: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 a) require investment in new technology or other capital costs, b) have an impact on efficiency and operating costs, c) have an impact on call-centre costs or call-centre prices (to their clients), d) affect competition in the call-centre market, e) have a different impact on different types of call centre, and if so, what factors affect the level of impact.:**

**Question 9:We would welcome any views on what factors may influence a call centre?s likelihood of adhering to the current or a stricter policy.:**