

**Additional comments:**

**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.:

**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. .:

1) In Figure 1 of the document under "intentional non-compliance", Ofcom state that "there are indications that rogue organisations might account for a significant proportion of silent and abandoned call complaints to Ofcom. On this basis, we might estimate the proportion to be 67%". This indicates that Ofcom estimate that the other 33% of companies are compliant with requirements and are treating customers fairly. To introduce further restraints on the companies who are already abiding by the rules will not tackle the problem and will lead to a huge cost impact for those businesses that use ACS.

2) In Figure 2, one of the potential changes to the abandoned call rate and approach to AMD suggested is to reduce the abandon call rate down as far as 0%. This would effectively outlaw predictive dialling in the UK and mean companies would have to revert to manually dialling. This would have a catastrophic cost implication for call centres across the UK and would result in some going out of business.

3) Increasing the minimum ring time to longer than 15 seconds as suggested in Figure 3 would potentially see a rise in the amount of answer machines passed in connected calls. It would also necessitate businesses to have more telephone lines to account for the longer dialling times required in order to increase agent productivity which again escalates running

costs. We also agree with Ofcom's concern that longer ring times would increase the annoyance and frustration of those customers who screen their calls and also not necessarily make any difference to those customers who take longer to answer the phone.

**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.:**

We believe that Ofcom's efforts should be focused on tackling those who are not complying with the current guidelines rather than introducing further measures which only impact those companies who are adhering to what is required and have a legitimate reason to be contacting customers.