

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, Intrum Justitia agrees.
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?
We would require a minimum of 3 months to implement these changes.
3. Has Ofcom provided sufficient clarity on how the abandoned call rate is calculated?
Yes, Intrum Justitia agrees.
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?
Yes, Intrum Justitia agrees.
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?
Yes, Intrum Justitia agrees.
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 an answer machine?
Yes, Intrum Justitia agrees.
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, Intrum Justitia agree you should not amend the existing policy.
8. Do you agree that Ofcom's policy proposal that companies provide a geographic contact number (01, 02 or 03) in addition to a free phone (080) number in the information message provided in the event of an abandoned call?
Yes, Intrum Justitia agrees.
9. Has Ofcom provided sufficient clarity on what constitutes a campaign?
Yes, Intrum Justitia agrees that sufficient clarity has been provided.