

Title:

Forename:

Surname:

Representing:

Organisation

Organisation (if applicable):

Email:

What do you want Ofcom to keep confidential?:

Keep part of the response confidential

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

Name, organisation and email

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:

Yes

Additional comments:

As part of this consultation, we would welcome clarification on the optional use of IVM to eliminate false positives by allowing diallers to play a message to a consumer (eg. Press 1 if you would like to speak to an Agent;) if an Answer Machine is detected?

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?:

We agree that the repeat calls to an answering machine should be limited, but we would like to see a change in the wording to reflect the following:-

- We would like to ensure that on subsequent attempts to the previously detected answering machine, that the advisor (call centre agent) is empowered to manually call the telephone

number so that they are available when the caller answers the phone (this process is known as preview dialling mode). This will ensure that repeat attempts to the same number will result in an advisor having to deal with the caller (even in the event of the called party having an answering machine, it being a busy number, no answer detected etc) thereby eliminating repeat silent calls to answering machines.

- We would also like to see a change from once every 24 hours; to be for the current day;, as this will allow operational flexibility for organisations, and we don't believe this will cause anxiety if the previous point was adhered to. This will allow companies to operate within their business day as opposed to a 24 hour period. As an example, if an answering machine was detected today at 3pm and subsequent attempts for the day result in a non customer contact (complying to the revised regulations), the current regulation could limit a company on being able to proactively contact a customer until after 3pm the following day which may affect customer relations, especially if a call attempt needed to be made in the morning.

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?:

No.

We feel that a 4 - 6 month implementation period should be allowed as organisations may need to plan for the changes which could include future planning, staffing adjustments, product changes etc.

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

Yes.

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?:

Yes.

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?:

Yes.

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.

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'?:

As answering machine detection accuracy is dependent on accurately detecting voice energy, the longer the detection period, the more accurate the detection rate would be. So, if the two second policy was amended to be from end of salutation answering machine detection accuracy would improve significantly.

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?:

Yes.

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

Different organisations may interpret Calling Scripts differently and would recommend changing a campaign definition to be based on the reason for calling. Calling Script could pertain to agent desktop scripting and a minor change to this script could then alter the campaign definition allowing multiple calls to be made to the same customer, but under different campaign guises.