

Title:

Forename:

Surname:

Representing:

Self

Organisation (if applicable):

Email:

What do you want Ofcom to keep confidential?:

Keep name confidential

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

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:

You may publish my response on receipt

Additional comments:

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?:

No. 24 hours is far far too short.

If those unanswered calls are being redirected (eg to a voicemail service) a daily unanswered call would typically cost the recipient £40 to divert the calls in respect of *each* unsolicited nuisance caller, and possibly a further amount of £40 to pick up the unwanted calls if the recipient does not have the calls forwarded by email. Ten such nuisance callers, all ringing daily, could potentially cost the recipient £800 per year.

If the initial limit is to be one call every 24 hours, it needs to be supplemented by a very low annual limit (eg 3 unanswered calls in any one year) to minimise costs to the recipient. Or,

the technology needs to be developed so that automatically placed calls are preceded by a code which disables automatic forwarders.

Alternatively, a central web site should be set up so that a person who has received an unwanted call can register not to receive further automatically placed calls from that organisation, and should receive a receipt confirming that the company concerned has been instructed not to place further automated calls to that number.

Better still, if such callers actually said what they wanted instead of hanging up, it should not be necessary for the caller to attempt *any* further calls. In the extremely unlikely event that the caller wanted the service being promoted by the unsolicited nuisance caller, that person would call back to make their own arrangements.

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?:

Yes

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

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?:

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?:

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? :

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'?:

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?:

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

