Title:

Mr

Forename:

Rolf

Surname:

Nordquist

Representing:

Self

Organisation (if applicable):

Email:

rolfn@avaya.com

What do you want Ofcom to keep confidential?:

Keep nothing confidential

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

e-mail address

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Of com should only publish this response after the consultation has ended:

You may publish my response on receipt

Additional comments:

My expertise is in call detection and classification so I have limited my response to the proposed amendment to the 2 second policy.

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?:

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?:

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'?:

No. I definitely believe that Ofcom should amend the existing two second policy as set out in the 2009 Amendment to start from end of salutation. We need to eliminate the length of salutation from the equation. It has no bearing on the perceived response time to a salutation. An individual normally expects the response to a salutation to occur after the salutation is complete. That should be the starting point at which response time is judged.

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'?: