

Title:

Mr

Forename:

Michael

Surname:

Mckinlay

Representing:

Organisation

Organisation (if applicable):

Sytel Limited

Email:

michaelm@sytelco.com

What do you want Ofcom to keep confidential?:

Keep nothing 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:

Yes

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?:

It is an unfortunate and misconceived proposal. Ordinarily in a predictive campaign one might expect to call an answering machine several times in a day. The proposal would undermine predictive performance on a campaign by as much as 5-6 mins per agent hour. A better solution would be just to turn off answering machine detection, than make this change - but see answer to 4 below

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 comment

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

No comment

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?:

We think that the whole idea of a reasonable rate of false positives is simply unachievable and are extremely concerned that Ofcom continue to think otherwise. We are aware that Ofcom is under extreme pressure from a number of organisations to retain answering machine detection and hence incur false positives. We know of no properly independent work that would suggest this can be done and allow predictive dialling to still occur.

Ofcom have the power to resolve the matter easily by recognising that a false positive is a silent call. Once upon a time it was determined to ban silent calls. It should now do so.

As the recent LBM study, and other user experiences have consistently shown, stopping answering machine usually improves bottom line results, because of the improvement in call quality.

It certainly will not send business offshore as some CBI members seem to be claiming and it will lead to a general improvement in the acceptability of outbound calls amongst consumers, since they will no longer have to listen to predictive pauses, whilst they are tested to see whether or not they might be answering machines.

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?:

No comment

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? :

No comment

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'?:

Certainly not. It would have a minor impact only on false positives and a very negative impact on consumers. But see answer to 4.

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?:

No comment

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

No comment