

Aspect

Additional comments:

Question 1:We would welcome views and evidence from stakeholders on (a) the main types of harm that consumers experience from nuisance calls in general and specifically in relation to silent and abandoned calls and (b) how to measure the harm. Please refer to [Annex 4 Call for inputs questions](#) for details of the points you may wish to consider in your response.:

Question 2:We would welcome views and evidence from stakeholders on what are the key drivers of (a) silent calls and (b) abandoned calls. Please refer to [Annex 4 Call for inputs questions](#) for details of the points you may wish to consider in your response.:

Question 3:We would welcome views and evidence on the use of AMD including (a) if call centres have changed their use of AMD in recent years and if so why (b) the volume of calls made by call centres with and without the use of AMD (c) false positive rates when using AMD and any data to suggest that the accuracy of AMD has improved in recent years.:

Question 4:We would welcome views and evidence on potential changes to the policy to help reduce the harm caused by silent and abandoned calls including those identified in Figure 2 (abandoned call rate and approach to AMD), Figure 3 (time limits for calling consumers and connecting to a live agent) and Figure 4 (good management and appropriate processes). Please refer to [Annex 4 Call for inputs questions](#) for details of the points you may wish to consider in your response. .:

The proposed changes do not appear to take into account new contact center technology capabilities that have come out in the last decade that allow for alternative solutions for improving the company/consumer engagement experience. I would suggest that if any changes are made to the current policies, consideration should be taken for companies that invested in technology with these new capabilities as a means to address the concerns related to silent and abandoned called received by consumers.

The following is a list of a few of the newer capabilities that open the door to alternative solutions for abandoned and silent calls:

- 1) The ability to play a message or an automated voice response script (IVR) prior to disconnecting a call that is flagged to be abandoned as a part of the currently allowable 3%.
- 2) The ability to alternatively play an automated voice response script (IVR) when an answering machine is detected.
- 3) The ability to force contacting a consumer or number in Preview for a period of time after a certain type of call result such as an abandon or an answering being detected (message played or call dropped).
- 4) The ability to play a personal greeting recorded in the agent's own voice immediately upon

connecting a call to an agent.

The following are two examples how these capabilities can be implemented to improve the consumer's experience during the engagement process.

Example 1:

Upon an ACS detecting an answering machine, the ACS could play an automated response (IVR) first asking if a human has answered (standard wording could be defined), and if yes, then press or say "X" to be routed to an agent. If there is no response, then the ACS can leave a message. If a message was left, force subsequent attempts for a period of time (e.g. 24 or 72 hours) to require a live agent to place those subsequent calls.

Benefits related to Example 1:

By playing an automated voice script (IVR), false positives will allow the consumer to hear sound and not have a silent call as well as allowing them to speak to an agent. This process will also allow companies to get a much better idea of what their true false positive rate is and allow the resulting statistics to be entered into their ACS for adjusting abandoned rate calculation. Companies will avoid having to make another attempt at a later time which could have the same false positive result costing them more money as well as annoying their customer. By forcing subsequent calls to be placed by a live agent for a period of time, a feedback mechanism would be in place to prevent a company from inadvertently bombarding a consumer with automated follow up calls in case they have issues responding to the IVR script being played.

Variants:

Variant 1: For solicitation calls for which there is no pre-existing relationship with or consent from the consumer identified as an answering machine (i.e. false positive detection), the IVR could alternatively offer an automated opt-out script to remove the consumer from the system preventing any future attempts.

Variant 2: A similar process can be used for abandoned calls where an IVR script is played prior to disconnecting with the consumer.

Example 2:

When a company is running a live agent outbound predictive campaign using an ACS, play a greeting recorded by the agent the consumer was connected to stating the agent's name and the name of the calling company. After which the agent immediately starts to engage with the consumer.

Benefits related to Example 2:

Timing issues were identified as a possible reason for a percentage of silent calls.

Immediately upon connecting a consumer with an agent within two seconds, an agent may not always respond immediately for a variety of reasons. The result is that even though the ACS connected the consumer within two seconds, the consumer experiences a silent period greater than two seconds. If a recorded greeting is immediately played upon connection, the false silent time will be eliminated. In order to prevent abuse and disorientation from the consumer hearing two different voices, the recording should be one made by the same agent that the consumer is connected to after they have been connected. This will provide an audit mechanism to prevent the practice of placing a consumer on hold with a generic message during an outbound call.

Question 5: We would welcome views and evidence on potential changes that could be made to the policy relating to the a) current five general examples of persistent misuse (misuse of automated calling systems, number-scanning, misuse of a CLI facility, misuse for dishonest gain ? scams, and misuse of allocated telephone numbers) or b) other examples of persistent misuse. Please

refer to [Annex 4 Call for inputs questions](#) for details of the points you may wish to consider in your response.:

Question 6:We have not identified any significant changes to this section of the policy, relating to the issuing of notifications, at this stage. However, we welcome views and evidence from stakeholders on any changes they consider may improve the understanding or clarity of this section of the policy :

Question 7:We would welcome information on the current operation of the outbound call centre market, in particular a) the size of the current outbound calling market e.g. the annual number of calls made as well as the value, b) the size of total annual costs in the outbound market (where possible split by operating costs and capital costs (or depreciation)), c) the average costs per call/per agent (or per agent hour), d) the split of call centre locations (domestic or overseas) that make calls to UK numbers.:

Question 8:We would welcome any initial views and evidence on the potential costs and benefits of any of the potential changes to the policy. In particular, whether any of the potential changes would a) require investment in new technology or other capital costs, b) have an impact on efficiency and operating costs, c) have an impact on call-centre costs or call-centre prices (to their clients), d) affect competition in the call-centre market, e) have a different impact on different types of call centre, and if so, what factors affect the level of impact.:

Some of the proposed options such as changing the currently allowable 3% abandon rate to either 1% or 0% may increase the cost to engage with consumers by eliminating technological leverage for companies that have made an investment in technology with the intent to foster better consumer engagement than they could without the use of technology. In certain cases, this increased cost to engage may have the unintended result of passing the increased cost on to the very consumers that the proposed changes are intended to benefit. This might even reduce the level of beneficial communication due to an altered cost/benefit analysis. I think that any changes should address the issue of companies engaging with consumers for which there is an existing relationship. In order that the "existing relationship" definition is not misused, qualifications could be added such that the communication is related to an existing goods or services relationship, or for a purpose that the consumer has provided prior consent or preference (e.g. "Please contact me when a certain pricing condition occurs."). Exemptions for certain engagement purposes may also make sense such as notifying the public of utility outages.

Question 9:We would welcome any views on what factors may influence a call centre's likelihood of adhering to the current or a stricter policy.: