

**Title:**

Mr

**Forename:**

John

**Surname:**

Butler

**Representing:**

Self

**What additional details do you want to keep confidential?:**

No

**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

**Additional comments:**

These are personal views and may or may not reflect the views of any organisation with which I am associated.

**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.:**

These types of call cause anxiety and distress to many of the more vulnerable in society, especially the elderly. Apart from the difficulty of actually answering calls to those with reduced mobility, there will also be concerns that people are trying to check whether a house is occupied prior to attempting a break in. The harm is in my view the same for mobile and land lines calls. It may be measured by public survey.

**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.:

Most abandoned or silent calls do not leave any message nor do they display a valid calling number. An increasing number display a number that is fictitious in order to fool devices that reject anonymous calls. I conclude that the calls are computer generated and that there are insufficient agents/ ports on the voice play back machines to service the number of calls being answered.

**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.:

No comment.

**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. .:

In my view, silent calls should not be allowed.

If there are insufficient agents, a message should be played giving an apology and the name of the company for whom the call is being made. For example, &quot;Acme Trading limited is sorry to have disturbed you. Our telephone number is 01234567890.&quot; All calls should be required to display a valid telephone number that is answered by a live person during normal business hours. If CLI cannot be provided calls should not be made.

**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.:

see the answer to q4 above

**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 :**

no comment.

**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.:**

no comment

**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.:**

no comment

**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.:**

At present, the policy is widely ignored. Perhaps, any organisation persistently in breach of the rules should have its licence to connect to the network rescinded. The apparent lack of interest in enforcement or the inability to check whether rules are being obeyed may influence behaviour. Confusion between ICO and Ofcom also encourages bad behaviour.