Name Withheld 5

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.:

It is more a general annoyance rather than harm. There are a number of problems where nuisance calls cause more than annoyance - with vulnerable people who often sign up for things as well as fall into scams and where the caller asks to speak to a relative who is deceased. This can cause particular distress. It probably wastes between 30 seconds and 5 minutes per call. In a business setting we receive a number of nuisance calls per week - this probably costs us around 15 minutes of lost productive time per week.

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.:

(a) silent calls are mainly generated by automatic diallers using analogue answer machine detection,
(b) abandoned calls are driven by over dialling on the outbound dialler.
The biggest nuisance is recorded message calls.

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.:

(a) Less contact centres are using AMD in recent years, with many people turning it off
(b) AMD by listening to the line is not accurate and it does not appear to have improved in recent years
(c) There has been no significant improvement in AMD by listening to the call in recent years. However the Network AMD working group could soon be close to a breakthrough of detecting answer machines from network voice machine messages set back from the telecoms provider.

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 biggest annoyance these days seems to be calls coming from overseas and also from automated message diallers. These seem to work on the basis of automated messages.

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.:

Both Ofcom and ICO seem to have been very ineffective at tackling nuisance calls.
The persistent misuse seems to make it far too difficult to prosecute and companies seem quite adept at avoiding this.
I strongly think that Ofcom should be doing more to work with carriers to block nuisance calls in the network. I have spam software that blocks out many unwanted emails, but I have no way to block network calls apart from buying the &pound;70 BT Call Guardian answer machine. This puts the service out of the reach of vulnerable people. There should be a facility to allow people to opt in to a service to block dubious calls.

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 :

The number of notifications to people suspected of creating a nuisance needs to increase. It also needs to be more visible. If not the name of the company then the number of notifications reported.
More frequent smaller fines would seem to be the way, perhaps with a points system like the way we deal with people who drive to fast. Small fine + 3 points for first offence. 12 points = complete ban.

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.:

There are around 1 million people employed in the contact centre industry in the UK.
Around 10-20% of contact centre traffic is outbound.
The average cost per call seems to be in the &pound;4 to &pound;10 range. I can

probably provide more detailed information.
Anecdotally nuisance calls now seem to be around 50% coming from overseas.

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.:

Unknown.

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.:

For the larger more reputable companies/brands probably a very good chance. For the smaller outsourcers a reasonable chance. For the more dodgy companies and the scammers there could be much greater problems.
Ofcom also needs to address the problems with overseas call centres.