Name Withheld 6

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.:

N/A

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.:

Yes we agree ACS is main and only driver for abandoned calls within our business.

Yes we agree with all reasons outlined in figure 1.

We are not aware of any other issues with Mobiles other than coverage and those outlined in Figure 1.

Within our business we will ring a number for 24 seconds in order to provide the longest time possible for an answer before disconnecting.

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.:

We no longer use AMD and have not done so based on our own testing in two different ACS which both provided higher than acceptable numbers of false positives on both systems. We would challenge any business which continues to use AMD and manage silent or abandoned calls within the prescribed abandon rates

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. .:

Figure 2 - Potential changes to the abandoned call rate and approach to AMD.
We believe the use of AMD is not accurate enough to be able to manage abandon rates within the 3% target, if the target was reduced further then this would be even harder to achieve, if not as it is in our opinion already, impossible.
To remove the current 3% abandon rate target and set at Zero would render any ACS for outbound predictive dialling or call blending obsolete. There is no feasible way a system which is making automated calls and/or call blending can avoid calls being abandoned. The cost for our business would be significant;
-We could experience between a 60% and 80% decrease in outbound dialling volumes
-Complete re-organisation of the way the campaigns are managed.
-The restructure of all strategies and cost models for contact strategy
-Impact on efficiency and operating costs which would eventually be passed onto the consumer or put our business at risk.
-Reduced competition in the Debt collection industry
Figure 3 - Possible changes to time limits in relation to the 15 second time to ring.
We already work well above the specified time limits so this change would not impact us and would be welcomed.
Figure 4 - possible changes to encourage good management and appropriate processes, for example carrying out test calls, agent performance monitoring, having competent persons manage the system.
We already work in a way where competent persons manage the functionality and changes made with the ACS with a fully operational test platform, so again would welcome a tightening of the policy on this.

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.:

Further clarification on misuse powers in relation to calls made at unsociable hours would be useful.
IVM systems should only be used where a customer is not placed on hold; rules to clarify this would be useful e.g. set a maximum number of seconds

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 :

N/A

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.:

N/A

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.:

We believe any changes outlined would lead to a significant reduction in the investment in new technology as the current technology would be rendered unfit for purpose based on the rules.
It would decrease efficiency and increase operating costs
It may lead to job losses and increase the cost to serve clients which in the end would be passed onto consumers and lead to increased prices for the goods or services they are receiving.

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.:

Stricter rules would only be adhered to if the financial penalties reflected the serious nature this causes consumers alongside publication which would damage reputation.
Coming down on those companies which intentionally break the rules would be better than changing current policy for those who conform.