Altitude Software comments on OFCOM's June 2010 consultation document:

Our comments relate to the use of AMD technology and the impact on contact centre productivity and the consumer of current technology.

Paras 3.24 – 3.33

We would question whether the productivity benefits stated in the Verint report are overstated as they may not take full account of the impact of 'false positives' on the 3% abandoned call limit:

- The more aggressively AMD is set to identify answer machines, the more 'false positives' will be generated;
- As 'false positives' are included in the 3% abandoned call rate, this reduces the number of abandoned calls that are allowed to be generated by the overdialling used by a predictive dialler;
- This means that as AMD is used more aggressively, the predictive dialler will need to be slowed down, thus increasing the idle time between calls experienced by agents.

Our proposal regarding limiting the nuisance caused by the use of AMD technology:

That OFCOM requires providers of network answer machine services to play a specific, brief tone immediately the call is connected to the service. As the majority of answerphones today are network based, this will allow providers of outbound dialling technology to recognise an answering service immediately upon call connection, thus removing the guesswork implicit in the current regulations regarding AMD false positives. The effect of such a change will also be to reduce the risk of non-compliance by outbound operators, to improve their operational performance, and to reduce the extent and frequency of delays (within the 2 second limit) in a contact centre agent greeting a customer. This change is also in the business interests of network operators as it enables their clients to use their network services for outbound calling where otherwise the operational issues and risks surrounding compliance may discourage usage. The change would also allow OFCOM to set more easily measurable and achievable guidelines that both protect the consumer from silent and nuisance calls, and support legitimate outbound calling activity.

Submitted by Altitude Software

27 July 2010