

Title:

Mr

Forename:

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Representing:

Self

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What do you want Ofcom to keep confidential?:

Keep nothing confidential

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

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Additional comments:

This consultation has been framed only with the needs of respondees from the telecoms industry in mind and this is why some of the questions asked about AMD, ACS and false positives are incomprehensible to ordinary retails telecoms customers.

Yet Silent Calls are a very important issue for residential telephone customers so their needs

and their understanding of the subject should have been born in mind when framing the questionnaire.

Question 1: Do you agree that Ofcom should limit the number of times a company can call an answer machine without guaranteeing the presence of a live operator to once every 24 hours?:

No. I think allowing a company to call once every 24 hours is still far too frequent and continues to allow substantial material harm and nuisance to be caused to called households.

In my opinion a company should not be allowed to make such a call without a manned operator being present either at all or failing that no more often than once every six months.

The fact that Ofcom still proposes to allow such unmanned calls to happen once a day tells us that Ofcom is once again not fulfilling its principal duties to Citizens and Consumers under Section 3(i) of the Communications Act 2003 and is yet again showing excess favouritism to the commercial interests of those making these unwanted calls.

Allowing such unmanned calls once a day is a wholly and utterly unacceptable frequency but this proposal typifies Ofcom's weak as water control regime over commercial abuses in the telecoms sector.

How does Ofcom explain its laissez faire approach to telecoms regulation compared to its strict and punitive control of regulatory breaches in the broadcasting sector.

Question 2: Do you agree with Ofcom that a two month implementation period (from publication of Ofcom's revised statement) would be an appropriate length of time for industry stakeholders to adopt any changes to comply with the proposed 24 hour policy?:

No. I believe these changes should be introduced within one month as there is no excuse for making an unmanned call at all and especially not once every 24 hours.

Question 3: Has Ofcom provided sufficient clarity on how the abandoned call rate is to be calculated?:

No it hasn't. As usual Ofcom is trying to give the impression that it is doing something useful for the consumer whereas all it is actually doing is codifying the existing abuse over Silent Calls and allowing it to continue.

Question 4: Do you agree with the factors set out by Ofcom for determining a reasoned estimate of AMD false positives in an ACS user's abandoned call rate?:

I don't know what an AMD is and you have failed to explain either this term or ACS in the questionnaire.

This tells me that as usual Ofcom was only expecting its cosy network of chums in the

telecoms industry to respond to the consultation and had not properly designed this consultation with the needs of the general public in mind.

Question 5: Has Ofcom provided sufficient clarity on how AMD users should calculate an abandoned call rate that includes a reasoned estimate of AMD false positives?:

I still don't know what all this AMD and false positives mumbo jumbo is. All I know is that it is almost certainly an excuse to allow incompetent call centre operations to continue making these unmanned calls to their customers once every 24 hours.

Question 6: Has Ofcom provided sufficient clarity on how non-AMD users should calculate an abandoned call rate that includes an estimate of abandoned calls picked up by answer machines? :

No it hasn't. You have only framed this question for people in the telecoms industry and I can't be bothered to wade all the way through yet another of your long and impenetrable consultations to try and find out what non-AMD users are.

Question 7: Do you agree that Ofcom should not amend the existing two second policy as set out in the 2009 Amendment from 'start of salutation' to 'end of salutation'?:

You haven't explained what the current two second policy is compared to "start of salutation" to "end of salutation" . So how can I answer the question?

Question 8: Do you agree with Ofcom's policy proposal that companies provide a geographic contact number (01, 02 or 03) in addition to a freephone (080) number in the information message provided in the event of an abandoned call?:

Yes I strongly support this proposal. It is about the only positive proposal that genuinely substantially benefits consumers in the whole set of proposals on Silent Calls. Unlike the impenetrable mumbo jumbo on AMD and AMS I immediately understood the proposal from the question.

Question 9: Has Ofcom provided sufficient clarity on what constitutes a 'campaign'?:

No it hasn't. From your question I have no idea what you consider constitutes a "campaign". Do you expect me to wade through pages and pages of your usual impenetrably lengthy consultation (for which there is also no link in this questionnaire) in order to find out?