

Title:

Mr

Forename:

Michael

Surname:

Strelitz

Representing:

Self

Organisation (if applicable):

Email:

michael@strelitz.co.uk

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:

Ofcom is confused, misinformed and mistaken. In my experience these systems are used ONLY for marketing purposes. They are not used for meter readings, online purchases or bank fraud issues etc. If they were, these organisations would leave a message with a verifiable return geographic or freephone contact number. They never do. Given that they are used ONLY for marketing purposes (IF there is a very small non-marketing usage that has eluded me, it makes no difference) the "efficiency savings" of these

systems are not costs that are passed on to the consumer but marketing investments with a measurable return.

Further, Ofcom should seek means to tackle such calls from outside the UK. Some ideas: Not allowing number withheld calls from outside the UK (or EC); requiring registration by organisations using such systems into the UK and encouraging whistleblowing; bilateral agreements with other countries.

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. Your Option 5 - Extend the 72 hour policy to include calls to answer machines should be adopted.

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. Do not agree with proposed change.

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

yes

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?:

Yes

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?:

yes

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? :

Yes

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'?:

Yes

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. Emphatically so.

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

Yes.