Response from Sytel

to Consultation Questions
contained in the Ofcom document

**"Review of how we use our
persistent misuse powers
(Focus on silent and abandoned calls)**

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1. Introduction

Sytel has been a supplier to the contact centre market since the 1990s and its products, including its dialler, are used in over 50 countries around the world. We have always believed that a healthy outbound market requires suppliers and call centres alike to ensure that their products do not abuse consumers. We campaign for what we believe in and for many years Sytel has had a long history of working with regulators and national marketing organisations all over the world to help frame effective rules to prevent nuisance calls. Much of the detail of rules in the UK and elsewhere, such as the minimum ring time for live calls, stem directly from recommendations made by Sytel. We welcome Ofcom's initiative in reviewing the issues raised in their October 2014 consultation paper. Our comments are in respect of just two issues.

2. Limit on abandoned calls

Ofcom is asking whether the limit for abandoned calls should be lowered to 1% from 3%. There is a suggestion that many call centres can operate efficiently at a lower target level for abandoned calls. This is simply not true. Outbound campaigns with in excess of 50 agents should get some productivity benefit at a 1% level. But such campaigns are very much in the minority. Most campaigns are much smaller than this and would achieve no material productivity at a 1% level.

We do not believe that a reduction in the target rate, as suggested, would have a significant impact on silent and abandoned calls. We believe that the major contributors to nuisance calls are false positives and calls made by call centres, both domestic and overseas-based, who simply disregard compliance.

2. Use of Answering Machine Detection (AMD)

In our submission to Ofcom in 2008 we looked in depth at the issue of false positives and said that the incidence of these made AMD incompatible with the deployment of predictive diallers. This remains largely the case today and we are pleased to see Ofcom effectively now arriving at the same conclusion in their commissioned paper "Developments in call centre and network answer phone detection" published last month.

Sytel was responsible for the initiative which led to the formation of the Network AMD Working Party and we would like to see Ofcom and other interested parties now work to ensure that service providers in the UK provide a digital standard for network AMD. In the medium term this is the one sure way to counter the issue of false positives and help keep nuisance calls to a minimum.