

**Question 1: Do you agree that the proposed changes make for a clearer set of rules that enable compliance to be achieved with a greater degree of certainty?:**

Overall, Cabot Financial welcomes the new proposals for change. However, Cabot Financial wishes to express a concern in relation to the playing of a brief recorded message in the event of an "abandoned call".

It is proposed by Ofcom that the industry plays a brief recorded message when the recipient of an abandoned call begins to speak in the event of an abandoned call.

Cabot Financial is concerned about this new proposal for the following reasons:

o Cabot Financial, whilst operating a predictive dialler system, has found that an individual, on many occasions, does not begin to speak but remains silent until Cabot Financial greets the individual which would cause a delay in playing a recorded message. This would give rise to individuals ending the call sooner and would give further rise to complaints being sent to Ofcom and/or the Company concerned as individuals may believe that they are the subject of silent calls and therefore contrary to the Ofcom's Statement.

o Cabot Financial adopts and operates a predictive dialler on outbound telephone calls. It is our submission that the current systems that operate predictive diallers would not be able to recognise when an individual begins to speak. As a result the recorded message potentially will not be played or played at the wrong moment giving rise to silent calls.

o Cabot Financial strongly believes that the existing recommendation is clear and sufficient and for the reasons above we believe that the proposed recommendations for change would not be successful or favourable to the individual and/or the industry that operate predictive dialler systems.

**Question 2: Do you agree with Ofcom's approach to determining whether the use of automated messages constitutes misuse?:**

N/A

**Question 3: Do you believe that it is possible to define objective criteria for applying the public interest test.:**

N/A

**Question 4: Do you believe that outbound call steering should only be used with customers who have given their prior consent?:**

N/A

**Question 5: Do you agree with Ofcom's clarification that the exploitation of all types of revenue-sharing numbers represents a form of misuse?:**

N/A

**Comments:**