



Abtran response to Consultation Paper CP 54

Document Information

Subject:	Abtran response to Consultation Paper CP 54	
Document Owner:	Conor O' Flaherty	+ 353 87 961 911
Version:	V1.02	
Last Updated:	22 July 2011	

By email: code@centralbank.ie

Ref: PR/CO'F

22 July 2011

Consumer Protection Codes Division
Central Bank of Ireland
PO Box 559
Dame Street
Dublin 2

Dear Sir / Madam,

Please find enclosed the submission of Abtran in response to Consultation Paper CP 54 on the review of the Consumer Protection Code.

Introduction to Abtran

Abtran is Ireland's leading provider of business process outsourcing (BPO) services. We manage a number of large scale contracts across a number of sectors, providing a comprehensive range of customer management services to clients in Ireland and the UK. We are registered with the Central Bank as an insurance / reinsurance intermediary.

Summary Information

Date of Establishment	1997
Location	Multiple sites in Ireland
Ownership	Founded, owned and managed by the current Executive Directors
Current Staff Levels	1000 staff; +850 contact centre, administration, payment processing and advisory staff with +150 management and support staff

Section 3.35 – Unsolicited Contact

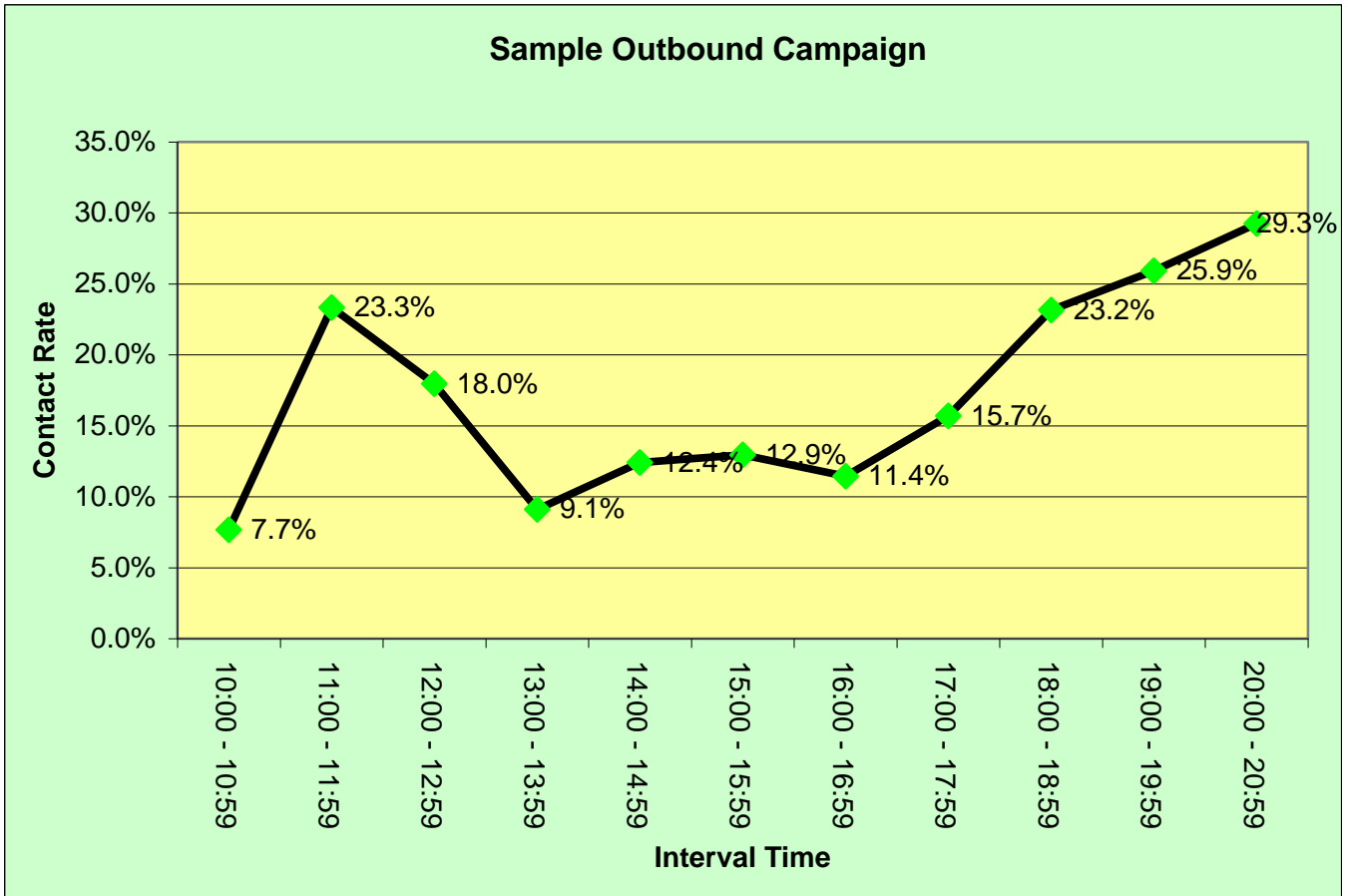
The current consumer protection code includes provisions regulating unsolicited communication to consumers. We are of the opinion that this regime has worked well and provides adequate measures to prevent consumers from fraud or other illegal activity.

We believe the new rules will prevent regulated entities from contacting consumers on products or services that can be of benefit to the consumer. Furthermore, the revised time and day restrictions restrict consumers who cannot deal with their personal items during working hours.

Current trends in society point to longer working hours and increased shift working, with many consumers not getting home before 7pm and being un-contactable during their working day. The limiting of the contact period to 7pm will limit the opportunity for regulated entities to make contact with Consumers.

In addition it is our experience that there is a better contact rate with consumers between 7pm and 9pm. In the sample campaign below the contact rate with customers has increased almost twofold from 5pm to 6pm (15.7%) versus 8pm to 9pm (29.3%).

Example of improved contact rate between 7pm and 9pm



Reasons for not reducing the contact times

1. Improved contact rate results in less missed calls, reduced call backs and an overall better consumer experience.
2. Consumers are more likely to make informed decisions given they have more time to consider the options at home.
3. A reduction in contact rates by regulated entities will result in more attempts being made and may result in the cost to serve being increased. This may result in costs being passed onto consumers.
4. Regulated entities will find it more difficult to be flexible with employment terms, specifically around scheduling and overtime.