



SIP Trunks

Voice Traffic Operational Policy

www.2circles.com

Introduction

This document describes 2 Circles accepted voice traffic profile, performance parameters for diallers and our governance for nuisance and malicious calls for new and existing customers using our SIP Trunks product.

2 Circles reserves the right to limit or prevent traffic that breaches the guidelines in this policy or in the event any particular traffic presents a risk to the integrity of the network or product platforms. This policy is in line with standard Industry practice and other service providers involved in originating, transiting or terminating voice traffic may take similar action at their discretion.

The scope of this policy are calls that, in some respect, transit 2 Circles SIP Product. This document describes 2 Circles accepted voice traffic profile, performance parameters for diallers and our governance for nuisance and malicious calls for new and existing customers using our SIP Trunks product.

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Nuisance Calls

A Nuisance Call is one that is either unwanted or one that is “silent or abandoned” which means that a call centre is not following the regulations on availability of live operators etc.

Unwanted Calls

The Privacy and Electronic Communications (EC Directive) Regulations 2003¹ (“PECR”), prohibits organisations from making unsolicited live or automated direct marketing calls to Subscribers (business or residential) who have registered their number with the Telephone Preference Service (“TPS”). PECR also prohibits organisations from sending unsolicited direct marketing emails or SMS text messages to individual subscribers who have not consented to receiving such messages and/or whom have previously explicitly told them they do not want them.

On 26th May 2011, the Information Commissioner's Office (“ICO”) gained powers to serve third party information notices on communications providers and to impose civil monetary penalties of up to £500,000 for the most serious breaches of PECR. New statutory guidance was published on 30 January 2012 and several companies have already been fined.

Silent and Abandoned Calls

The Office of Communications (“Ofcom”) is responsible for the enforcement of a silent or abandoned call. This is where a predictive dialler makes more outbound calls than the centre has agents for and the recipient gets dead air; or an abandoned call, which is where the ringing stops because the number of available agents has been used, as it has been deemed to be an offence (misuse of a public electronic communications network²) under Section 127 of the Communications Act 2003³ and has the power to fine up to £2m per offence. Section 127 offences also carry criminal liability. The exact rules are replicated herein under “Dialler Regulatory Standard”

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1. <http://www.legislation.gov.uk/ukxi/2003/2426/contents/made>
 2. Ofcom published a statement on 20th December 2016, explaining the forms of misuse in detail - https://www.ofcom.org.uk/__data/assets/pdf_file/0024/96135/Persistent-Misuse-Policy-Statement.pdf
 3. <http://www.legislation.gov.uk/ukpga/2003/21/section/127>

Accepted Voice Traffic Profile

The table below shows the accepted voice traffic profile for new and existing customers:

Specification	Definition
Average Length of Call (ALOC)	an ALOC of over 60 seconds with
Answer Seize Ratio (ASR)	an ASR greater than 50%
Calls Per Second (CPS)	CPS to channels ratios expected for normal traffic profiles
Automated Outbound Diallers	Automated outbound diallers are acceptable upon agreed parameters where the overall voice solution is far larger than the automated dialler element. Each requirement will need to be assessed on an individual basis by 2 Circles.

Dialler Regulatory Standard

Diallers or any "automatic call generation" service connected to 2 Circles products, must comply with the following standards:

1. The 'abandoned call' rate shall be no more than three² per cent of 'live calls', calculated per campaign (i.e. across call centres) or per call centre (i.e. across campaigns) over any 24-hour period, and shall include a reasoned estimate of Answer Machine Detection (AMD) false positives.
In the event of an 'abandoned call', a very brief recorded information message must be played either no later than two seconds after the telephone has been picked up, or no later than two seconds after an individual begins to speak, which contains at least the following information:
 - a. the identity of the company on whose behalf the call was made (which will not necessarily be the same company that is making the call);
 - b. details of a no charge (0800) or Special Services basic rate (0845) number the called person can contact so they have the possibility of declining to receive further marketing calls from that company; and
 - c. includes no marketing content and is not used as an opportunity to market to the called person.
2. Calls which are not answered must ring for a minimum of 15 seconds before being terminated.
3. When an 'abandoned call' has been made to a number any repeat calls to that number in the following 72 hours may only be made with the guaranteed presence of a live operator (the '72-hour policy').
4. For each outbound call a Caller Line Identification (CLI) number is presented to which a return call may be made which is either a geographic number or a non-geographic number adopted as a Presentation Number which satisfies the Ofcom Guide to the use of Presentation Numbers.
5. Any call made by the called person to the contact number provided shall not be used as an opportunity to market to that person, without that person's consent.
6. Records are kept for a minimum period of six months that demonstrate compliance with the above.
7. Calls made by diallers must not cause consumer harm and otherwise comply with the relevant Ofcom guidelines.¹

This Standard is considered by TalkTalk Business to be a regulatory requirement to be adhered to by any signatory to our contracts.

1. http://www.ofcom.org.uk/__data/assets/pdf_file/0024/96135/Persistent-Misuse-Policy-Statement.pdf
2. Ofcom's latest policy decision is that this is not a "safe harbour" figure, i.e. a volume below this will not exempt someone from investigation and enforcement, it is merely a prioritisation threshold for their work.

Operational Standard

2 Circles Operational Standard definition is as follows:

This is traffic which typically has

- **an ALOC of over 60 seconds with**
- **an ASR greater than 50%**
- **CPS to channels ratios expected for normal traffic profiles**
- **max 200 concurrent SIP sessions, unless pre-agreed**
- **5 CPS, unless pre-agreed**

For clarity, this is 2 Circles default position to ensure that we protect the network and all 2 Circles customers. Exceptions to this can be considered by the Operations Director with an appropriate business case; however, any traffic outside of this profile will automatically have remedial action considered.

2 Circles reserve the right to limit or block traffic which we consider may harm or impede the proper functioning of the rest of the network. Below is a list of traffic patterns not acceptable, this is not an exhaustive list.

- Time of Day - Dialler traffic will be the first type to be shed during any network faults or high traffic periods
- Call attempts to a large percentage of unallocated numbers - ASRs below 50% will be deemed as suspect (e.g. Data cleansing activities) and would probably be a breach of the Dialler Regulatory Standard. In these cases, we will contact the partner/customer and request they improve the traffic profile (see Exceeding the Operational Standard section)
- Each endpoint will have a defined CPS limit. Higher CPS can be negotiated by engaging the pre-sales team on a case by case basis. Depending on the nature of the traffic bespoke solutions may need to be designed that may result in additional costs.
- The endpoint must control their traffic within the agreed limits. Sending too many calls will get a 503 response and uses unnecessary SBC processor resource.
- 2 Circles has a large range of network performance alerts. False alarms can hide other network problems and diverts resource away from projects and product development. Therefore, if a Dialler pattern is thought be causing alarms or red statuses on the NOC monitors remedial action will be taken.

Operational Standard continued

Exceeding the Operational Standard

The Network Assurance Team run a daily report to identify traffic that falls below our Operational Standard. If a customer's traffic falls below the Operational Standard, 2 Circles will request the customer to stop sending this traffic. The notification will be in the form of an email to the nominated customer contact.

If within a 24-hour period of the initial notification the traffic profile remains below our Dialler Operational Standard, 2 Circles reserves the right to reduce the customer's capacity/CPS or request the customer remove the traffic from the network with immediate effect. It is the responsibility of the customer to redirect the traffic in this situation.

Other Information

For further industry guidelines and information please refer to....

- <http://www.legislation.gov.uk/uksi/2003/2426/contents/made>
- Ofcom published a statement on 20th December 2016, explaining the forms of misuse in detail -
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- <http://www.legislation.gov.uk/ukpga/2003/21/section/127>



For more information about our VoIP services,
please contact us today

03456 200 200



2 Circles Communications

Ver House, 23-25 High Street Redbourn, Herts
AL3 7LE

03456 200 200

www.2circles.com

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