

The New Rules of Customer Engagement

How AI, tech, regulatory evolution, and changing consumer expectations are rewriting the rules of CCM

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Kaspar Roos | *Founder & CEO* | Aspire CCS

Will Morgan | *Senior Research Analyst* | Aspire CCS





From static documents to interactive dialogue

Customer Communications Management (CCM) was once a compliance-driven, document-centric discipline exemplified by static, one-way messaging, but today, generations of consumers raised to expect instant access to goods, services, and information online are pulling the market away from channel-led delivery to a customer-directed dialogue spanning the full customer lifecycle. Artificial intelligence, and increasingly agentic AI, are accelerating this shift as agents begin to interact with enterprises on the customer's behalf. At the same time, evolving regulations are codifying consumer expectations into law and driving document digitalization even as the document's purpose is shifting from pure disclosure toward more complex and interactive guidance.

Documents won't disappear – they are becoming part of the broader experience – giving businesses have an opportunity to drive desired consumer action.

Regulation is an accelerator

Legislation governing a number of vertical markets in most territories have historically required businesses to secure explicit consent before moving customers away from paper documents. That model is now giving way to “digital by default” where customers are onboarded with electronic communications but retain the right to opt out. Digital-first does not equate to fewer obligations, in fact, the safeguards around accessibility, security, and consumer choice matter more, not less.



Nevertheless, regulations are accelerating communications transformation by narrowing the gap between disclosure and advice. Consumers increasingly want to know what to do with the information they receive, so regulators are shifting their focus away from simple disclosure in order to positively influence customer outcomes. The result is a broader spectrum of communication that will inform, explain, guide, suggest, and ultimately facilitating action with artificial intelligence driving forward movement by personalizing guidance as much as possible without crossing over into fully individualized advice.

Closing the gap between information and action

A communication can satisfy every disclosure requirement and include all the necessary information, technical criteria, eligibility conditions, and applicable rules, but the customer is often left without a clear sense of what to do next, resulting in an interaction that is compliant but incomplete because it doesn't equip the consumer to act.

Regulatory regimes across the world are now targeting this gap. The UK's Consumer Duty reframes the test for a compliant communication around customer understanding, not just technical disclosure while the EU's Consumer Credit Directive 2 and Retail Investment Strategy move in the same direction, as do North American standards on clear, understandable communication and APAC frameworks on fair treatment and informed decision-making. Closing this gap requires businesses to change the way their customers navigate communications. Lead with what matters to the individual, using plain language and layered information to

guide the customer rather than expect them to interpret which rules and regulations apply to them. Compliance dictates what must be communicated, but experience design will ultimately determine if the customer can act on it.

Taken further, this points toward Interaction Experience Management (IXM) — a discipline that combines communications, data, rules, and interaction into a guided experience that asks a few questions and returns a semi-personalized outcome rather than a generic disclosure. The UK FCA's Targeted Support regime and the EU Retail Investment Strategy both allow suggestions tailored to groups of consumers without crossing into fully individualized advice. Regulatory advances like these expand orchestration from simple communications generation into an active, personalized part of the customer's decision-making journey.

Turning regulated communications into customer experience

Regulated industries increasingly recognize that satisfying disclosure requirements is not the same as delivering a good customer experience (CX). The most CX-mature organizations are applying the same disciplines associated with retail and banking communications to regulated interactions to make them timely, personalized, and seamless across channels. Aspire CCS' consumer research in UK banking has found that younger customers overwhelmingly prefer the dialogue-directed approach app-only banks use to embed communications into digital experience while those over the age of 55 prefer the more document-led style of traditional banks. To appeal to all demographics, businesses must combine



the rigor of document-first communication with the responsiveness of dialogue-first experience. While established banking apps already inform and explain spending, newer tools identify savings and draft the emails needed to act. The most advanced AI agents even negotiate bills and cancel subscriptions directly on the customer's behalf. When the trajectory runs from "Here's what happened," to "I'll do it for you," visibility is becoming table stakes, and helping customers achieve a better outcome is the differentiator.

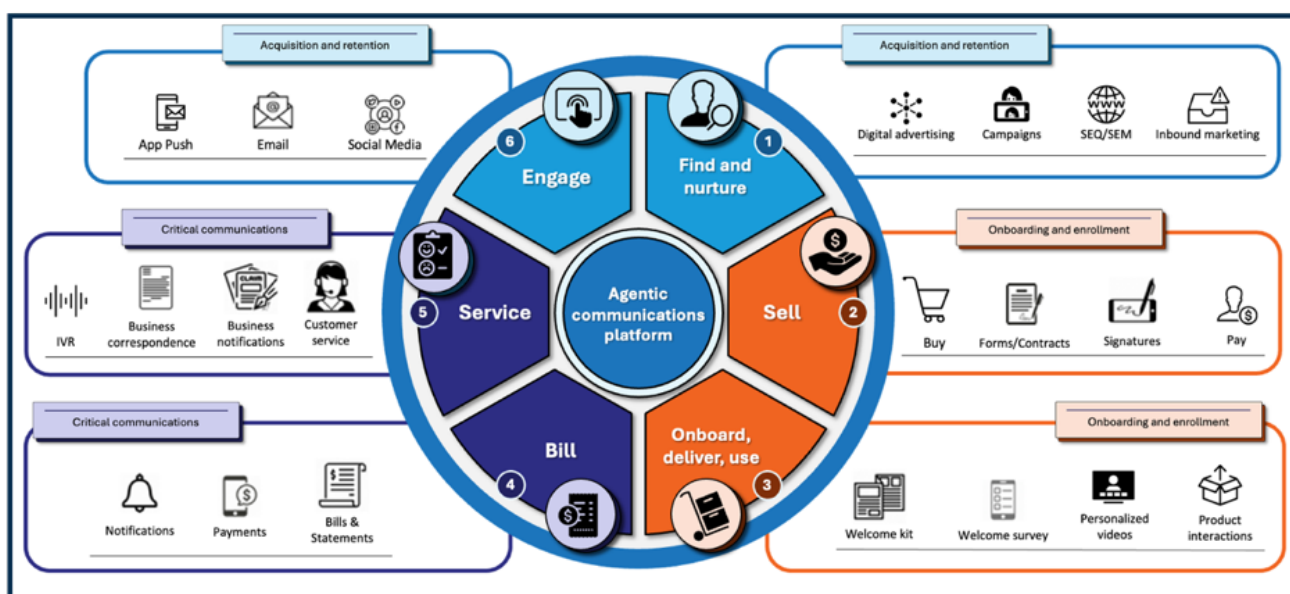
AI is changing the rules of customer experience

Traffic originating from artificial intelligence — including customers arriving via ChatGPT and other third-party agents— already accounts for a meaningful and fast-growing share of site visits to many organizations' websites. These customers arrive already informed, having researched options and formed expectations before ever entering

the business' digital experience, and they will grow frustrated if they're forced to start over from the beginning of the process.

This has direct implications for content: information increasingly needs the right metadata and structure to be interpreted accurately by AI agents as well as by human readers. The practical challenge becomes meeting an already-informed customer at the next-best interaction. This shift also creates an opportunity to solve long-standing fragmentation. While consumers experience a single relationship with their chosen brand, internal communication management has historically been split across marketing, sales, onboarding, billing, and service. An agentic communications platform can sit across these silos, maintaining customer context as they move between interactions without requiring underlying systems to disappear by placing a layer of intelligence and orchestration above them.

Figure 1: The shift to AI can ultimately make seamless, holistic CX a reality



Source: Aspire CCS, 2026.



The target architecture is evolving accordingly. Early generative AI use was largely confined to individual capabilities like authoring and summarization. The Model Context Protocol (MCP) now offers a standardized way for AI agents to interact with enterprise tools and data, giving rise to agentic architectures in which AI orchestrates activity across systems rather than supporting a single task. In this model, enterprise signals establish context, an AI layer decides what should happen next, modern iPaaS platforms determine how that decision is executed, and CCM creates, interacts, and delivers. Human oversight and governance remain essential throughout, with autonomy calibrated to risk.

This architecture is already emerging in practice. Some organizations are using cloud migration mandates as an opportunity to separate composition from orchestration, keeping their CCM platform focused on creating communications while

process logic and integrations move upstream into an iPaaS layer with orchestration expected to become increasingly agentic over time.

CX maturity is the dividing line

Aspire CCS latest enterprise research revealed that the sharpest differences in business outcomes occur when organizations achieve CX maturity. For instance, the most digitally advanced and consumer-focused businesses expect to spend far more on communications in 2027 than their less mature competitors. CXM organizations also lead in generative AI adoption and are far more prepared to leverage autonomous agents.

Figure 2: CXM businesses outperform less mature competitors across multiple dimensions

	CCM 1.0	CCM 2.0	CXM
 Communications spending 2027 Expected	- 1.7%	0.5%	5.0%
 In-channel digital delivery Aggregate across channels	26%	24%	42%
 Leveraging Gen-AI today Aggregate across use cases	31%	42%	57%
 AI readiness and advocacy High autonomy + HITL	22%	27%	42%
 Marketing / CX ownership	9%	28%	42%
 Fully integrated CCM and CXM	6%	10%	47%
 Accessibility Strategic approach	15%	27%	58%
 Data collection and IXM Using advanced methods today	20%	26%	34%

Source: *The State of Customer and Experience Management*, Aspire CCS, 2026

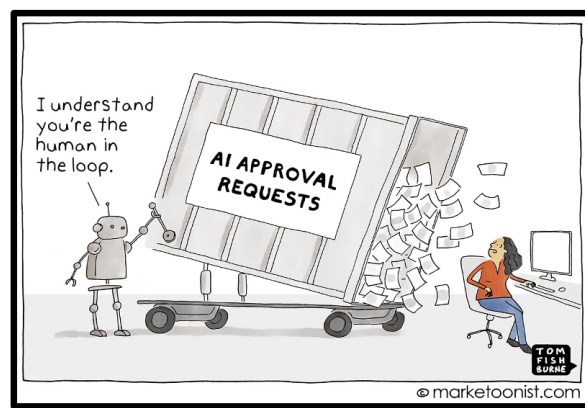


Communications ownership shifts too, with Marketing and CX playing a larger role in more mature businesses as these organizations work to ingrate Customer Communications Management (CCM) and Customer Experience Management (CXM) workflows. CXM is not simply "better CCM" — it's a distinct operating model better positioned for AI-mediated, agentic customer experience.

This maturity gap shows up directly in outcomes. Organizations that redesign regulated communications around customer experience (rather than the underlying document) report substantial gains with self-service climbing from roughly 50% to near-universal adoption, digital interaction across touchpoints more than doubling, and satisfaction scores improving markedly. The evolution from CCM to CXM is an experience transformation — not a document redesign — with better customer outcomes and greater business efficiency advancing together.

Avoiding new bottlenecks

Nevertheless, as organizations move toward agentic communications, they should be careful not to replace one bottleneck with another. CXM organizations are simultaneously more ambitious about AI autonomy and more likely to use human-in-the-loop (HITL) controls. While this is sensible, as more consequential decisions warrant stronger governance, if every AI-generated action awaits human approval, the benefits of automation disappear. The answer is risk-based governance, running low-risk activity autonomously while higher-risk decisions trigger review and HITL functions as a control mechanism rather than the default workflow.



Source: Marketoonist, 2026.

How to successfully evolve your customer communications

Modernize your technology foundation.

Build toward cloud-native CCM, APIs, and orchestration capable of supporting AI and agentic interaction rather than simply replacing one document-generation platform with another.

Design around customer outcomes. Start with what the consumer is trying to understand, decide, or do, and design the communication around that rather than around the document. Customers experience one continuous conversation while organizations manage a collection of communications across IT, compliance, marketing, and CX. Define the outcome first, then work backward into the operating model, process, and technology.



Rethink AI governance. Human oversight remains essential, but it shouldn't be the default response to every action. Clearly define where AI can operate autonomously, where oversight is appropriate, and where explicit approval is essential.

Evolve the operating model. The boundaries between CCM, CX, digital, data, and IT are increasingly difficult to maintain. Give business and CX teams greater control over composition and design while IT continues to provide standards, architecture, security, and governance.

The future is not about adding AI to CCM, but about evolving communications from document production into an intelligent, interactive part of the combined customer experience. Few organizations are doing this alone. Aspire CCS' latest research shows that nearly three quarters of all businesses rely on external partners to varying degrees for communications modernization while only one in five manage it entirely in-house. Choosing the right technology matters, but so does choosing the right implementation partner. Don't optimize the communication in isolation — optimize the customer outcome it exists to support.

About Aspire CCS

Aspire CCS is a leading global advisory firm dedicated to the evolving **Customer Communications Management (CCM)** and **Customer Experience Management (CXM)** markets. We work with enterprises, CCM-CXM software, and services providers as well as investors and strategy buyers to deliver unbiased guidance and actionable insights through a variety of highly specialized services.

<http://www.aspireccs.com/>



Contact

+44 (0) 1277 582346

info@aspireccs.com

United Kingdom

Jubilee House 3 The Drive
Great Warley, Brentwood
CM13 3FR

United States

700 Commerce Drive
Suite 500
Oak Brook, IL 60523

aspireccs.com

