



Claudio Pollack
Ofcom
Riverside House
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BY EMAIL

4 October 2013

Dear Claudio

Ofcom's Statement and consultation on the processes for switching fixed voice and broadband providers on the Openreach copper network ("the Statement")

Sky welcomes Ofcom's Statement on the processes for switching fixed voice and broadband providers operating on the Openreach copper network.

Sky, along with the rest of industry, has for several years urged Ofcom to help industry to address, in a proportionate manner, recognised problems with consumer switching on the Openreach copper network, to ensure a good customer experience and to support competition. Sky welcomes the proportionate response to those problems advocated by Ofcom in the Statement.

In particular, we support Ofcom's rejection of a costly, disproportionate and unnecessary GPL Third Party Verification process in favour of extending the current gaining provider-led process ("GPL NoT+"). However, we would be extremely concerned if, as suggested in the Statement, Ofcom were subsequently to propose a move to introduce a Hub and central database in two or three years' time, after industry had already invested heavily in the GPL NoT+ process. Such a course of action would suggest deficiencies in Ofcom's evidence gathering to date and would place a costly and disproportionate burden on industry.

Our principal point of disagreement with Ofcom's Statement lies with the analysis of the effects of reactive save activity set out in Section 6. We consider that this analysis is deficient, and that Ofcom has failed properly to address the submissions previously made on this issue by Sky and other parties, including a report by CRA.

We (and industry) recognise that Ofcom's proposals are a fundamental step change in the switching process on Openreach's network and will require significant resource and coordination from all providers. Sky is committed to working with industry to ensure that Ofcom's proposals are workable in practice and can be implemented seamlessly and



simultaneously by Openreach and all communications providers interfacing with that network. To that end we will continue our dialogue with industry and contribute to its response, via UKCTA, with constructive suggestions on how best to implement the proposals in an orderly and workable manner, including providing feedback on the proposed modifications to General Condition 22.

We look forward to working with Ofcom and industry to achieve an improved switching process for broadband and talk customers over shared infrastructure on the Openreach copper network.

Yours sincerely

A handwritten signature in blue ink, appearing to read "C. Stylianou", is located below the text "Yours sincerely". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Chris Stylianou

MD – Customer Service Group