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Open letter to One Touch Switch Implementation
Progress Steering Group and residential
communications providers in scope of OTS rules

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One Touch Switch (OTS) – a single process and implementation progress

Recent discussions at Ofcom’s OTS Implementation Progress Steering Group suggest it may be useful for Ofcom to reiterate some important elements of the new switching General Conditions that will come into force on 3 April 2023. The General Conditions that will enter into force on 3 April 2023 require regulated providers to maintain a single process for switching residential customers using fixed services (General Condition C7.18). The requirement for there to be a single process for residential fixed switching of phone and broadband services is important to allow residential customers to switch easily between any providers regardless of the network or technology used.

It is our understanding that The One Touch Switching Company (TOTSCo) has been established by communications providers to deliver the OTS switching process, including the messaging Hub. TOTSCo is therefore the relevant industry forum referred to in General Condition C7.18 (with effect 3 April 2023). This Condition requires Regulated Providers to ensure that they maintain a single process for Communications Provider Migrations of Fixed Communications Services for use by Fixed Switching Customers in accordance with the GCs and “any applicable industry processes as agreed by the relevant industry forum”. This ‘single process’ is OTS, as submitted to Ofcom by industry during an extensive period of consultation, and it is imperative that all providers within scope of the OTS rules work with TOTSCo and ensure that they follow agreed detailed process rules including use of the messaging Hub that TOTSCo has been asked to deliver.

Furthermore, our decision to choose the OTS process, originally known as Option Y, was based on the information and design proposed by industry¹ in which the messaging Hub plays a central role in facilitating and auditing the sending of switching messages between gaining and losing providers.

For these reasons, we would emphasise that we consider communications providers use of the TOTSCo messaging Hub as integral to compliance with the OTS rules.

¹ Option Y Consortium, July 2020. [Gaining Provider-Led Switching – The Option Y Proposal](#), v2.0.

Implementation progress and the 3 April 2023 deadline

Finally, based on recent discussions, we understand that the TOTSCo hub may not be in place by 3 April 2023 and that, accordingly, it may be the case that providers are unable to demonstrate compliance with some of their switching obligations under the General Conditions. Our expectation is that providers will, separately and collectively, take all possible steps to establish the OTS process (with all associated features referred to in the industry design of 'Option Y') as expeditiously as possible. In the event that providers are not in compliance with their switching obligations by 3 April 2023, we will consider whether any enforcement action is appropriate to ensure that outcome.

We will circulate this letter more widely to communications providers via the Office of the Adjudicator for Telecoms (OTA2) contact list.

Yours sincerely,

Cristina Luna-Esteban