

To communications providers in scope of One
Touch Switch rules

Cristina Luna-Esteban
Director, Telecoms Consumer Protection
Direct line: 020 7981 3339
Email: Cristina.LunaEsteban@ofcom.org.uk

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One Touch Switch implementation – Extension of NoT+ consumer protections

I am writing to update you on Ofcom's position regarding the enhanced Notification of Transfer (NoT+) functionality in light of the progress of the continuing One Touch Switch (OTS) industry trials.

The OTS Hub was made available by The One Touch Switching Company (TOTSCo) for live customer switches in July 2024. This has enabled a programme of live customer trials of OTS to be undertaken by communications providers with the goal of steadily increasing volumes of OTS customer switches towards full launch, with 20 brands already participating. This ramp up plan is essential to ensure that the OTS process is working effectively and reliably for customers before NoT+ is turned off.

The most recent information we have received from communications providers and TOTSCo indicates that although there are large and increasing volumes of customers being switched successfully using OTS, these volumes have not yet reached a level to provide sufficient confidence that all customer switches will be able to follow the OTS process by the planned industry launch date of 12 September 2024. I understand emerging evidence from the trials has indicated a need for providers to carry out further analysis and improvements to ensure the matching process achieves a sufficiently high success rate to effectively support all customer switching journeys, but these improvements may not be fully implemented by the planned launch date.

We expect all communications providers in scope of OTS to do everything possible to accelerate the full adoption of OTS for all customer switches, and for OTS to be the main switching mechanism from 12 September 2024.

However, in light of the progress to date, we consider that it would be appropriate to retain the existing NoT+ functionality, for a limited period beyond 12 September 2024. This would enable customers to be switched using the existing NoT+ process as a back-up option, and only in those circumstances where communications providers, having started the switching process via OTS, find that it is not possible to technically proceed. To this end, I am today writing to Openreach, KCOM and wholesalers who operate NoT+ to ask that they delay its removal for a six-week period. We will review progress during this time including requesting information from communications providers on the number of switches concluded via OTS, and those which may have had to be put through the NoT+ process and the reasons for this.

To be clear, we expect providers to use OTS in the first instance for all switches and only to consider the back-up NoT+ process when it is not technically possible to proceed with the switch through OTS, for example, if it is not possible to resolve a matching failure. This is to help protect consumers and ensure they receive the necessary information about their decision to switch. It is imperative that providers continue to make urgent progress with implementing improvements to the OTS process and we therefore expect any need for use of the NoT+ process as a back-up option to rapidly reduce over this period. Notwithstanding the extension of NoT+, providers must not use Cancel Other functionality for any OTS switch.

We understand that all communications providers who are to date participating in the OTS ramp up are fully committed to supporting 100 percent of customer switching journeys as a losing provider. Therefore, this should enable other providers to continue with existing plans to sign up with TOTSCo to use the OTS Hub and start gaining customers using the OTS process from 12 September 2024. Any provider which currently uses NoT+ should be aware that, for this 6-week transition period, they may need to support a proportion of losing customer journeys within the existing NoT+ process as well as via OTS.

Ofcom will continue to monitor the implementation of OTS closely. I expect communications providers to cooperate positively including with TOTSCo, network operators and wholesalers to ensure that customers continue to be able to switch services smoothly during this transition and that OTS can be fully adopted with the greatest urgency. In particular, it is important to share any insights from analysis of the matching process. I have asked the Office of the Telecommunications Adjudicator to continue to work closely with industry to ensure a smooth and speedy transition. As previously announced, our ongoing enforcement programme will review the conduct of all industry participants since our [statement](#) in 2021 in order to determine whether it is appropriate to open investigations into individual providers after launch.

Yours sincerely,

Cristina Luna-Esteban