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Dear David,

One Touch Switch number porting: Request for OTA2 to lead industry implementation

Ofcom has consistently been clear that One Touch Switch (OTS) will provide an easy, quick and reliable process for residential customers switching their fixed services and that OTS switching should happen much faster than the previous Notification of Transfer (NoT+) process. In our [February 2022 OTS Statement](#) we highlighted the importance of industry taking into account the interactions between switching and porting in the detailed design and implementation phase of One Touch Switch and we said that we would continue to discuss with industry the dependencies between these different areas of work (paragraphs 3.137 to 3.140).¹

These interactions are particularly important in view of the high-level switching requirements which came into force on 3 April 2023, and which apply to all switches. In particular, General Condition C7.4 requires CPs “to maintain simple and efficient processes for communications provider migrations” (CPM) and not “to delay or abuse the CPM process”. The CPM process includes the porting process where relevant. It would therefore not be acceptable for number porting failures or unnecessary delays to undermine the OTS switching experience for residential customers.

We understand that during the OTS implementation phase some large providers (including in consultation with the Number Porting Executive Steering Group) have worked with the OTA2 to identify and develop solutions for the interactions between OTS and number porting, and that this has led to the initial development of a proposal for an opt-in OTS-specific number porting process (or express porting) to streamline the OTS switching experience. We understand that the objectives of OTS number porting are to simplify validation (by removing those checks that duplicate aspects of the OTS matching process) and thus offer shorter lead times and a more reliable switching and porting experience. This would also remove ‘cancel other’ which would prevent any risk of its use by losing providers to inappropriately frustrate the process.

¹ https://www.ofcom.org.uk/__data/assets/pdf_file/0020/232058/statement-quick-easy-and-reliable-switching.pdf

We welcome the development of express porting, given the impact this is likely to have on the OTS switching experience and the policy objectives of a simpler and quicker switching process. We are concerned that if express porting is not adopted by communications providers, and in particular those with the greatest number of residential customers, then it may lead to residential customers experiencing a higher likelihood of porting failures or unnecessary delays when switching fixed services including their telephone number via OTS.

We would therefore now like the OTA2 to work with communications providers in scope of OTS rules, including, as appropriate, in consultation with the existing industry number porting groups, to focus wider industry effort on developing and implementing changes to number porting best practice to ensure it fully takes account of the interactions with OTS and achieves a better switching and porting experience for residential customers. We recognise this should not compromise industry's ongoing preparations for OTS launch on the go-live date of 14 March 2024, however we expect this must happen as quickly as possible thereafter.

Yours sincerely,

Cristina Luna-Esteban