

Your response

Question	Your response
<p>Question 1: Do you agree with our proposal to require providers to develop and implement the One Touch Switch process?</p>	<p>Yes, the Common Wholesale Platform agrees with Ofcom’s proposal to develop and implement the One Touch Switch process for the following reasons.</p>
<p>The Common Wholesale Platform (CWP) is a consortium of independent network operators (altnets) developing a wholesale platform for open access. It will allow scale retailers to supply their services over independent networks. Led by 4 altnets (Airband, County Broadband, ITS Technology Group and Wight Fibre), the platform will be open to all altnets with high quality fibre networks and Next Generation FWA meeting the INCA Gold Standard Quality Mark criteria.</p> <p>Discussions have been held with 4 of the scale retailers and 2 major existing wholesale platforms who have indicated their interest in using the CWP to interface with and extend reach. Discussions with others are in progress.</p> <p>The Common Wholesale Platform will also be One Touch Switch compliant as per the work which has been done with OTA2 and this Ofcom statement on “Quick, easy and reliable switching”.</p> <p>Current funding announcements show that over £8bn of private investment has been committed to the altnet sector. The government’s DCMS BDUK funding for the whole industry under the “Project Gigabit Programme” will add £1.5bn to available investment and has a further £3.5bn committed as build plans roll-out.</p> <p>A recent analysis based on independent research forecasts that c. 11m premises will be passed by altnets by 2025.</p> <p>The Common Wholesale Platform will, therefore, allow scale retailers, and any CP with an Ofcom RID, to extend their coverage to the millions of homes passed by altnets quickly, easily, and efficiently. It will be a key contributor to the government’s target of gigabit broadband coverage by 2025.</p> <ol style="list-style-type: none"> 1. We are in agreement with this Ofcom statement and that “One Touch Switch” is Ofcom’s “preferred approach” to providing “Gaining Provider Led” switching for consumers to access more competitive services more easily. 	

2. We agree with Ofcom's reasoning as to why One Touch Switch will be easier for the customer to use. Once the customer has contacted their chosen new provider (GP), the CP will do everything else that is needed to co-ordinate with the losing provider (LP) via the OTS Hub for a successful and timely switch. It is very easy for the customer and, therefore, supports a competitive marketplace. This process will be supported by the CWP. Further, it means the customer is more in control of their communications with the LP, indeed, they would not have to contact them at all if they do not want to, thus avoiding the opportunity for unwanted save activity.
3. We further believe that the Code to Switch option does not meet Ofcom's criteria and therefore should not be considered for implementation. We note that a revised Code to Switch specification was published by Ofcom, but we do not believe that the addition of an interactive voice recognition (IVR) would overcome the significant issues that Ofcom has identified with the Code to Switch option, and with which we agree.
4. We agree that One Touch Switch would be easier to use than Code to Switch being simpler to understand and follow, be familiar to users of NoT, give greater control to customers, avoid difficulties of using the channels (now including IVR) to interact with the Losing Provider and, therefore, adding an IVR does not materially impact the conclusions in 1.16 (CTS not as effective as OTS) and 1.17 (CTS harder than existing switching arrangements). We have some specific comments on IVR later in this response.
5. The CWP is designed to be OTS-compliant from the outset and therefore will make it simple for both network operators and retailers to implement OTS-compliant switching within a rapid timeframe.
6. The CWP will allow all participants to contribute to an open and transparent governance system. This is seen as essential to encourage uptake by as many altnets as possible. CWP platform will operate independently of the collaborating partners to demonstrate its ability to provide fair and equitable access to any service provider. It will also take note of the governance discussions recommended by Ofcom under the aegis of the OTA2 in which we will participate.
7. We note that the December 2022 deadline for OTS will be challenging for the entire industry to meet given that Ofcom's final statement and GCs are not yet formally issued and given Openreach's estimated development timescale for "Option Y" as included in the OTA2 submission.
8. The need to establish a funding and governance framework for the organisation providing the hub services will add to the time required for implementation of the new switching platform.

However, we believe that the CWP will make it easier for participating altnets and CPs to implement OTS as early as possible within a common platform supporting access to the industry Hub as it becomes available. Indeed, we envisage implementing OTS across the

wholesale networks joining the CWP and hence any consumer (or business) switches over the CWP will be fully OTS compliant from the outset.

To address IVR specifically, we would make the following comments:

10. Just adding an IVR as one of the channels is not a material change to the fundamental character of “Code to Switch”. The reasons for this have been analysed in Ofcom’s statement and remain unchanged.
11. It still requires the customer to request a Code prior to initiating the switch with the Gaining Provider. This is different in principle to the customer placing an order with the Gaining Provider who then organises everything else. In Option X, customer must ask for a Code and can only then place the Switch order once that code is available and validated. Hence “Code first, then Switch” as opposed to “place Switch order” as designed by Option Y, “One Touch Switch”.
12. The Losing Provider is informed of the customer’s wish to switch ahead of the Gaining Provider and must take action before the customer can place Switch order.
13. Even with an IVR as one of the channels of comms, this still gives the technical opportunity for a trigger for customer retention activity by the LP ahead of the customer placing the Switch order with the GP.
14. IVRs are not common channels within the independent sector for switching. Having to develop and implement an IVR would, therefore, be a disproportionate burden on many network operators both in terms of financial and technical resource and changing their business process with the training and timescale that implies.

In summary, even as amended, the Code-to-Switch process still represents one extra layer of customer action before a switch can be initiated. The One Touch Switch was Ofcom’s preferred approach for this, and many other, reasons. We do not consider that the balance of this evaluation is materially changed by the addition of an IVR to the other customer communications channels in the original Code-to-Switch proposal.

As a point of information, the Executive Summary of the amended proposal states incorrectly that “From the outset of these discussions, one, credible, code-based candidate solution (“Option X”) has been the foundation of those discussions”. That may be correct for discussions between 2 of the parties, Sky and Virgin, and Ofcom. but is far from the case for the majority of the industry. It is a matter of record that all other parties in the OTA2 Working Group supported the non-code Option Y.

Question 2: Do you agree with our proposal to remove the rules relating to the existing Notification of Transfer process?

Yes. This provides one set of requirements for the entire industry.

Question 3: Do you agree with our proposed changes to require mobile providers to give residential customers information regarding the impact of a switch on any other services they have with the losing provider?

No comment.