

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, we agree with Ofcom’s proposal to develop and implement the One Touch Switch process for the following reasons:</p> <p>The BroadbandHUB is a Wholesale Platform specifically designed to aggregate broadband services from independent networks for access by CPs (https://www.broadband-hub.com/) Working closely with the INCA Switching & Wholesale Special Interest Group, and with the Common Wholesale Platform consortium from this group, The BroadbandHUB aims to be the platform of choice for many of the alt.net community. The platform already operates effectively in its native Swedish market, with more than 250k connected premises, over 20 independent networks and more than 30 Service Providers using the platform daily. The platform will also be OTS compliant, with some development work required. Our Swedish platform partners are Hubory (https://www.hubory.com/en/) 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 BroadbandHUB will, therefore, allow scale retailers, and any CP with an Ofcom RID, to extend their coverage to the millions of homes passed by independent networks 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 broad 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’s needed to co-ordinate with the losing provider (LP) via the OTS Hub for a successful and timely switch. It’s very easy for the customer and, therefore, supports a competitive marketplace. This process will be supported by The BroadbandHUB. Further, it means the customer is more in control

	<p>of their communications with the LP, indeed, they would not have to contact them at all if they don't want to, thus avoiding the opportunity for unwanted save activity.</p> <p>3. The BroadbandHUB has been designed with Wholesale Open Access at the forefront, and we believe that this will therefore make it simple for both network operators and retailers to implement OTS-compliant switching within a rapid timeframe.</p> <p>4. The BroadbandHUB will allow all participants to contribute to an open and transparent governance system for OTS. This is seen as essential to encourage uptake by as many altnets as possible. It will also take note of the governance discussions recommended by Ofcom under the aegis of the OTA2 in which we will participate.</p> <p>5. 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.</p> <p>However, we believe that the BroadbandHUB 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 The BroadbandHUB and hence any consumer (or business) switches over the The BroadbandHUB will be fully OTS compliant from the outset.</p> <p>https://www.broadband-hub.com/</p> <p>https://hubbubgroup.net/</p>
<p>Question 2: Do you agree with our proposal to remove the rules relating to the existing Notification of Transfer process?</p>	<p>Confidential? – N</p> <p>Yes, as this will provide a single set of requirements for industry.</p>
<p>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?</p>	<p>Confidential? – N</p> <p>No comments</p>