

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>Confidential? – N</p> <p>We are broadly in favour of option Y, the One Touch Switch, this would prevent friction and also allow customers to have a truly gaining provider led experience. We do not feel that option X is valid, even with proposed IVR, because it still requires a customer to interact with their previous supplier, additionally it would be complicated to determine identity from the IVR. With mobiles this is relatively simple as the mobile phone number is linked to the contract however with broadband and telephony this is not always the case, increasingly so with the move away from copper lines and fixed PSTN network.</p> <p>Therefore we do agree with OTS option Y, however we would like to make the following observations.</p> <ol style="list-style-type: none"> 1. With the implementation deadline of December 2022, we are concerned that this does not give the industry time to develop a suitable platform to facilitate this functionality. Particularly as neither option has been actually agreed upon yet. 2. Having been a pioneer in some rural areas we have found that customers wishing to transfer to another infrastructure with inferior service had often been promised comparable service and then receive a substandard service (E.g. ADSL from LLU as opposed to SLU) to the detriment of the customer, who often came back to our network. We need to ensure that products in the industry are comparably labelled so customers can make an informed decision.

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

Confidential? – **N**

Assuming this notification will then be present on the new OTS system, then yes. This would also include safeguards for the customer. We would still expect to still write to customers advising them of the transference of service and any detriment in service to be highlighted, otherwise the system is open to abuse. As was seen in the early days of utility switching where unscrupulous companies initiated switching requests without the consent of customers or without their full comprehension that they had just agreed to it

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?

Confidential? – **N**

Not just mobile but also broadband too, if a customer is going to be worse off following switch, then it is in their interests to have all the information to make the best choice for value and functionality.