

Emailed to: switching@ofcom.org.uk

14 April 2021

Dear Sir/Madam,

Ofcom Quick Easy and Reliable Switching Proposals for a new landline and broadband switching process and to improve information for mobile switching

I write in response to the Ofcom consultation on Quick, Easy and Reliable Switching and the additional proposal put forward by Sky and Virgin Media. As background, we have included at Appendix A information about Ombudsman Services.

1. Do you agree with our proposal to require providers to develop and implement the One Touch Switch process?

We welcome the proposals from Ofcom to improve the consumer experience when switching. We think it is important that switching is made as simple and efficient as possible. Competition has brought enormous benefits to communications customers but if consumers perceive or experience switching to be a difficult process, it is likely to dampen that competition. We support the One Touch Switch process which seeks to streamline the consumer journey when switching with fewer touchpoints and making switching more consistent across all service providers.

We see a significant number of complaints from consumers where something has gone wrong with the switching process, for example, consumers continuing to pay for services which they thought they had cancelled or receiving an unexpected charge for leaving a contract. We think the proposed approach of the One Touch Switch process will make things more straightforward for consumers switching and ensure they have the right information they need to make an informed decision and reduce unnecessary barriers to switching.

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

We agree with the proposal to remove the rules relating to the Notification of Transfer process, as the current process would not enable the information sharing requirements via the One Touch Switch process, which is key to enable consumers to give their express consent to the switch.

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

We agree with the proposed changes to require mobile providers to give residential consumers information regarding the impact of a switch on any other services they may have with the losing provider. For a consumer to make a true



informed decision, they need to know the impact on all the services they have with the losing provider, in particular bundled services (including fixed services, music and video streaming services, Pay TV and terminal equipment) which may have a dependency on the service being switched.

We think it would be helpful to assess the effectiveness of the proposals once they go live. We would welcome working with Ofcom and other stakeholders here, for example by sharing any insight from complaints we have around switching in relation to the new approach once it is live.

Please do not hesitate to contact us if you would like further information regarding our response. Our response is not confidential.

Your sincerely,



Ed Dodman
Director of Regulatory Affairs

For more information regarding this consultation please contact:

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Appendix A

About Ombudsman Services:

Ombudsman Services is a not-for-profit private limited company established in 2002 which runs a range of discrete national ombudsman schemes across different sectors including energy, communications and an appeals service in private parking. Each scheme is funded by the companies under our jurisdiction and our service is free to consumers. In 2019 we received 157,808 initial contacts from complainants and resolved 88,840 complaints. In the energy sector we received 116,700 initial contacts and resolved 58,034 cases, and in the communications sector, we received 40,184 initial contacts and resolved 17,426 cases. We also received over 84,000 appeals in our private parking appeals service.

We are:

- to our consumers, the people they can turn to for impartial advice and solution that's fair;
- to our partners, the people they look to for knowledgeable and insightful ways to help them reduce complaints by enabling them to make the changes they need to deliver better customer services;
- to our regulators, champions in protecting rights as well as partners in information sharing, we share our analysis so that regulators and business partners can make improvements; and
- to our people, here to enable them to deliver clarity to consumers and partners through meaningful work.