Quick, easy and reliable switching

Proposals for a new landline and broadband switching process and to improve information for mobile switching

Openreach response

14 April 2021

Foreword

On 3 February 2021, Ofcom published its consultation document entitled "Quick, easy and reliable switching".

This response is provided by Openreach Limited - a wholly owned subsidiary of BT Group.

We're the people behind the UK's digital network and we connect homes and businesses, large and small, to the wider world.

We work every day to get faster broadband speeds, broader coverage and better service for everyone. We're an open wholesale network provider.

Our customers are the 600+ Communications Providers (CPs) working in the UK – companies like BT, Sky, TalkTalk and Vodafone.

We connect people to their networks so they can sell them landline, mobile, broadband, TV and data services.

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i.   **Executive Summary**

1. Openreach supports Ofcom's objective that people should be able to switch telecoms provider easily to take advantage of the range of services available. We therefore welcome the opportunity to respond to Ofcom's consultation on "Quick, easy and reliable switching" as published on 3 February 2021. We note that Ofcom issued a new document on 29 March 2021 that proposes a modification to the Code to Switch process. We comment on this proposal in this document as part of our response and note that the deadline for comments was extended to 14 April 2021.

2. As a fixed telecoms wholesale provider, a number of the areas covered in the consultation document do not apply to Openreach, notably relating to mobile and CP/retailer activity. Therefore, we have focused this response on fixed line switching and porting. We are happy to discuss any elements of our response in more detail with Ofcom, the Office of the Telecommunications Adjudicator (OTA) and industry as required.

3. Key points:

   - Openreach supports that providers develop and implement a new 'One Touch Switch' process for all residential customers who switch landline and broadband services, regardless of who their provider is or the technology or network their provider uses.
   - We do not support the revised Code to Switch process as this updated proposal does not represent a pure gaining provider-led solution. Instead it echoes the Mobile switching solution. Openreach believes that Fixed Line Switching is very different from Mobile switching. With Mobile switching an end customer will switch all services associated with the handheld device in a complete bundle. Fixed Network Voice and Broadband can be delivered by different retailers and have far greater impacts on associated devices – for example vulnerable customers' healthcare devices, if services are switched in error. As a network provider Openreach believes that failure will occur if end customers initiate a code via the Losing Provider using an IVR system that relies upon codes being generated and sent up and down a complex supply chain.
   - Openreach has lots of experience and stands ready to contribute to how the One Touch Switch process could be implemented, including minimising potential points of failure.
   - The OTA facilitated process to enable cross industry dialogue and analysis has proved extremely beneficial in informing potential solutions and outcomes. Openreach considers that the OTA is best placed and experienced to carry forward the One Touch Switch process design and implementation requirements.
   - One important principle in enabling a switching process is to ensure that UK networks are used as efficiently as possible and therefore the potential to mistakenly provide new network when existing network is available must be avoided. This also alleviates the potential for customer confusion, reduces lead times and promotes a smooth customer experience.
   - Whilst Openreach supports the One Touch Switch process there are some important points of detail which need to be taken into account which are discussed in this document. In summary these relate to:
     - ➢ Product scope: there must be one pan-industry One Touch Switch process for all products in scope – for example One Touch Switch would apply to all WLR switches irrespective of

whether the product is required for a consumer (WLR Basic) or business (WLR Premium) customer.

➢ Process scope: there are some processes which rely on the Notification of Transfer (NoT) process but are outside the scope of the definition of switching. An important example of this relates to Working Line Takeover for which the NoT process and associated regulation needs to be maintained.

➢ Process scope: Openreach is closing down the PSTN network over the period from 2023 to 2025 and has already started to move WLR lines to new strategic products. These are technology migrations as opposed to end customer driven switches and should remain out of scope of the new One Touch Switch process.

➢ Minimum Lead times: these need to be agreed. Openreach is happy to support a reduction in the current 10 day (NoT driven) lead time.

- Number Porting: in relation to lead times, as consumer protection measures will be facilitated via the new message Hub, there is scope to significantly reduce the minimum lead times for the various port order journeys.

- There may also be the opportunity in the future to remove some of the validations of the port order if the end customer's telephone number has already been tagged by the incumbent operator. A natural extension to this would be to use the messaging Hub to send the appropriate port order placement and activation instructions to the correct range holder and losing providers.

- In relation to the One Touch Switch implementation timescale of December 2022, this could be challenging given the breadth of development and industry wide testing required to enable One Touch Switch to be up and running for consumers to use within this timescale.

- Openreach is concerned that a big bang switch on of a new process could be disruptive in the marketplace and we therefore would recommend a more phased implementation approach allowing industry to capture issues in a more controlled manner.

- We would urge Ofcom and industry to ensure that there is adequate time to allow for sufficient, across industry testing before launch.

ii. Development and implementation of One Touch Switch process

4. This Openreach submission builds upon that provided on 30 November 2020 in response to Ofcom's statement and consultation[1] issued on 27 October 2020.

5. Openreach recognises that end customers need to be able to switch providers easily to take advantage of the deals available to them. We support the principle that when end customers look to change provider, their new provider should lead the switch and offer a seamless switching experience. Openreach supports that providers develop and implement a new 'One Touch Switch' process for all residential customers who switch landline and broadband services, regardless of who their provider is or the technology or network their provider uses.

6. Openreach recognises and agrees that the architecture needed to facilitate a One Touch Switch process can only be achieved, either directly or through a messaging Hub[2] between the retailers in order to establish asset and end customer validation, identification and agreement.

7. We note that Ofcom issued a new document on 29 March 2021 that proposed a modification to the Code to Switch process. This suggested that as part of the 'contact centre' option CPs must offer customers the opportunity to receive their switching Code via an IVR platform. The customer would need to provide relevant authentication information (to ensure the request is valid) and the Code would be provided to the customer via the IVR which would allow all customers, including voice-only customers, to receive their Code without speaking to a CP agent.

8. Openreach considers this updated proposal does not represent a pure gaining provider-led solution. Instead it echoes the Mobile switching solution. Openreach believes that Fixed Line Switching is very different from Mobile switching. With Mobile switching an end customer will switch all services associated with the handheld device in a complete bundle. Fixed Network Voice and Broadband can be delivered by different retailers and have far greater impacts on associated devices – for example vulnerable customers' healthcare devices, if services are switched in error. As a network provider Openreach believes that failure will occur if end customers initiate a code via the Losing Provider using an IVR system that relies upon codes being generated and sent up and down a complex supply chain.

Product Scope

9. There must be one pan-industry One Touch Switch process for all products in scope. For example One Touch Switch would apply to all WLR switches irrespective of whether the product is required for a consumer (using WLR Basic) or business (using WLR Premium) customer. Conversely, a change of CP for an end customer (typically business) using an Ethernet product would be out of scope of the One Touch Switch process, noting that the CPs involved would likely need to provide their own equipment and carry out a cease and re-provide.

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[1] https://www.ofcom.org.uk/consultations-and-statements/category-1/proposals-to-implement-new-eecc
[2] Paragraph 3.13 Role of the Hub https://www.ofcom.org.uk/__data/assets/pdf_file/0024/212685/consultation-quick-easy-and-reliable-switching.pdf

Process Scope

10. Notification of Transfer – Working Line Takeover: For a Consumer switch the Hub will need a minimum of 3 data items to identify the correct line and end customer. These are the end customer's name, the address and the current CP. In a home moving scenario, the moving in customer will only have the address; they will not understand who the existing end customer is or their CP. As a result the messaging Hub will not know which CP to contact and if it did it would not be able to validate the line with the existing end customer. Therefore Working Line Takeover should be out of scope of the One Touch Switch process.

11. Technology migrations: Openreach is closing down the PSTN network over the period from 2023 to 2025 and has already started to move WLR lines to new strategic products such as SOGEA or FTTP. These are technology migrations as opposed to end customer driven switches and should remain out of scope of the new One Touch Switch process.

Minimum lead times

12. Openreach recognises that customers demand and expect swift action to move between telecoms providers (subject to appropriate consumer protection measures) and therefore Openreach is happy to support a reduction in the current 10 day lead time. This was previously driven by the NoT process which largely relied upon an exchange of written letters and has been in place for some time. With the advent of quicker processes based on new technology, such a lead time could be reduced.

iii. Importance of industry engagement and governance

13. As recognised by Ofcom[3] the Office of the Telecommunications Adjudicator established and coordinated an industry working group to develop a new switching process for residential customers switching fixed services in line with the EECC requirements. Whilst this resulted in two options being presented to Ofcom, the OTA was instrumental in providing the underlying analysis and potential costings associated with each of the options. Without the OTA leading this project, Ofcom is unlikely to have been in the position of being able to assess the extensive work carried out to inform and decide upon the One Touch Switch process.

14. Openreach recognises an important aspect of the One Touch Switch process is the use of a messaging Hub which would enable the losing and gaining providers to coordinate order flows and share information about the pending switch. The mechanism and approach to tendering for the messaging Hub necessitates coordination across the CP/retailer community (to this extent Openreach is not directly involved). We consider that the OTA has the knowledge and experience to coordinate the Hub tender process.

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[3] Paragraphs 2.31-2.37 Industry work to develop a new fixed switching process
https://www.ofcom.org.uk/__data/assets/pdf_file/0024/212685/consultation-quick-easy-and-reliable-switching.pdf

15. Ofcom has quite rightly recognised the need for pan-industry working to establish and implement the one Touch Switch process. Paragraph 7.7 states:

    development and implementation of any process by all of industry will require providers to work collaboratively. Providers cannot implement a cross-industry switching process independently. These considerations indicate that some form of industry forum may be required.
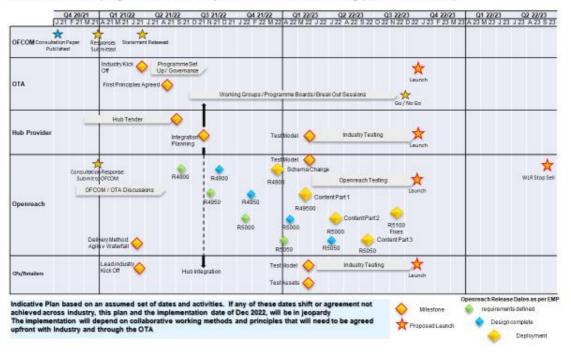
16. Such a forum will require governance and project management to be put in place. Openreach again considers that the OTA is best placed and has the necessary skills and experience to run such a programme. A fundamental part of this activity is to draw up clear Terms of Reference and subsequently seek pan-industry agreement on switching principles to gain alignment across the industry. Openreach is keen to participate in this process and provide input on the key requirements to enable robust implementation of a One Touch Switch process.

iv. Implementation Timeline

Potential milestone plan

17. Please refer to the plan below which provides a top-level summary of a potential milestone plan and highlights the following key points which must be considered when creating and implementing a solution such as the One Touch Switch pan-industry process. There are five swim lanes which represent the five key stakeholders who need to play an important part in order for One Touch Switch to operate. These are identified as:

    ❖ Ofcom
    ❖ OTA
    ❖ Hub Provider
    ❖ Openreach
    ❖ CPs/Retailers

Figure 1: Milestone Plan

Indicative Outline programme milestone plan for X Platform Switching (as of March 2021):

18. The speed of decision making is essential to achieve the implementation date of December 2022. Although each defined swim lane may operate at a different speed, there are certain control points that will need to be met in order to ensure the collective initiative progresses with confidence.

19. Certain core elements like the messaging Hub need to be identified and successfully tendered in order to enable a baseline set of principles that supports onward progression. Failure to do this could significantly delay the plan.

20. Well defined governance controls with supporting Roles and Responsibilities need to be established so that decisions, risks and issues can be communicated and agreed within jointly supported programme boards. Agreement on elements like minimum test standards, test models, test assets and test volumes need to be established and agreed early in the process – these success factors if not achieved present a significant risk to the programme of work.

Importance of robust testing schedule prior to launch

21. Openreach cannot emphasise enough the importance of and our commitment to robust testing. The need for this is evidenced through a number of years' experience in developing and implementing complex systems changes.

22. Depending on the type of system integration that will need to be supported, it is expected multiple phases of testing will be required against an agreed set of minimum standards. It will be essential to ensure that a strategy for testing is in place and that everyone engaged understands their responsibilities with regard to the volumes, solution quality and assurance that needs to be achieved. All testing should be considered collaborative, repeatable and prioritised, making best use of automation tools to reduce effort and gain confidence over time.

23. Due to the solution that is being proposed for a One Touch Switch process, the establishment of test assets will be an essential part of the process where support at retailer, wholesaler and network level will need to be coordinated and managed.

24. A key dependency on the One Touch Switch process launch date will be the approval to exit testing.

v. **Number Porting**

25. The existing Industry number portability process only allows for numbers in a working state to be exported to other voice providers. There is a requirement in the new regulation[4] to allow an end customer to retain their telephone number for up to 31 days following service cessation. Openreach is making changes to its porting systems and processes to allow the export of such a recently ceased number and this will be deployed in the Summer of 2021. Note that we already retain other range holders' numbers in a quarantined status for 31 days following service cessation before returning them, meaning that an end customer can restart a service if required.

26. With the advent of the One Touch Switch process, the existing consumer protection offered by the NoT process is no longer required as the end customer has approached the gaining provider initially and is also (via the messaging Hub) fully informed of the implications of moving from the existing provider. As the migration of the end customer's line and services will be via this new process, there is still the requirement to move the telephone number to any new voice provider. It is assumed (as the consultation document does not specify otherwise) that in the initial implementation of the One Touch Switch process, the existing porting processes to facilitate the number move are maintained. However, as consumer protection via the Notification of Transfer process is no longer required, there is scope to significantly reduce the minimum lead times for the various port order journeys.

27. There may also be the opportunity in the future to remove some of the validations of the port order if the end customer's telephone number has already been tagged by the incumbent operator. A natural extension to this would be to use the messaging Hub to send the appropriate port order placement and activation instructions to the correct range holder and losing providers.

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[4] Paragraph 2.28 New switching rules https://www.ofcom.org.uk/__data/assets/pdf_file/0024/212685/consultation-quick-easy-and-reliable-switching.pdf

vi.   Openreach response to specific Ofcom questions

We note Ofcom has asked two specific questions, the following provides our responses.

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

> *Openreach supports Ofcom's proposal to require providers to develop and implement a One Touch Switch process. Our rationale for this is provided in the body of this document, noting there are some points of detail that need to be worked through across the industry.*

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

> *We have reviewed Ofcom's proposal and we think the rules relating to the existing Notification of Transfer process should be retained for Working Line Takeover. Looking forward to Ofcom's planned consultation on any GC changes[5] required to support Ofcom's proposal, we require that general condition C7.15 and Annex 2 to Condition C7r are retained. Working Line Takeover works well for the industry – minimising customer disruption, re-using existing network and minimising costs across the industry.*

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[5] See footnote 148 and paragraph 7.5 regarding changes to the GCs https://www.ofcom.org.uk/__data/assets/pdf_file/0024/212685/consultation-quick-easy-and-reliable-switching.pdf