

Quick, easy and reliable switching

Statement and consultation on a new landline and broadband switching process and improved information for mobile switching.

9 November 2021



Foreword

On 3 February 2021, Ofcom published its consultation document entitled "Quick, easy and reliable switching" which outlined proposals for a new process for residential customers to switch their landline and broadband services.

On 28 September 2021 Ofcom published its final decisions on these changes, including a requirement for a new 'One Touch Switch' process where landline and broadband customers will only need to contact their new provider to switch. Included in this publication was a consultation on proposed amendments to the General Conditions. The Statement and Consultation document is referred below as "Ofcom's Statement and Consultation".

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.

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

Table of Contents

Foreword	2
i. Introduction	4
ii. Openreach response to specific Ofcom questions	4
iii. General points of principle	5
Scope of services utilising One Touch Switch	5
Ensuring network efficiency and encouraging streamlining of processes.....	6
Migrations and other processes	6
Implementation	7

i. Introduction

1. Openreach is pleased that Ofcom has confirmed support for the implementation of the One Touch Switch proposal. Openreach has been an active member of the industry work and analysis which underpins Ofcom's policy decisions on switching. Openreach will continue to contribute to the debate and has already participated in the OTA facilitated sessions held since Ofcom's document was published on 28 September 2021. Openreach's experience in enabling switching between Communications Providers (CPs) on the Openreach network means we are well placed to advise on potential solutions for the implementation of One Touch Switch.

ii. Openreach response to specific Ofcom questions

Question 1: Do you agree with our proposed new GCs to implement the One Touch Switch process?

2. The proposed new GCs relate primarily to CPs/retailers and therefore the impact on Openreach is minimal. However we would make some observations that are provided in response to Question 3 below.
3. We are pleased and support the position that Working Line Takeover (WLTO) procedures are maintained (C7.28 and Annex 1¹).

Question 2: Do you agree with our proposed amendments to the Auto-Switch GCs?

4. As a fixed wholesale telecommunications operator Openreach does not provide mobile services to end customers and therefore Openreach has no comment on this question.

Question 3: Do you have any other comments on our proposals?

5. GC7.3² relates to the potential speed of migration. With the current Notification of Transfer (NoT) process there is a built in 10 working days window to ensure end customers are adequately informed prior to switching. With One Touch Switch this will be part of the upfront validation process undertaken between Gaining and Losing Providers. Once this part is completed and the Gaining Provider has placed an order with Openreach, we are happy to support condensed migration timescales.
6. C7.4³ requires that migration processes are simple and efficient and this applies to bundles which may include pay TV packages. Whilst this primarily relates to the interactions of Gaining and Losing Providers at the verification and authentication stages of One Touch Switch, Openreach would expect that end to end processes do not compromise the end customer experience - see section below regarding General Points of Principle.

¹ Ofcom's Statement and Consultation Page 81

² Ofcom's Statement and Consultation Page 69

³ Ofcom's Statement and Consultation Page 69

7. C7.4 d)⁴ requires that there is continuity of service, unless not technically feasible, and any loss of service during the CP Migration does not exceed one Working Day. This will be the responsibility of the CP and as such Openreach will act on instructions from CPs. In the event of any loss of service as a result of a misunderstanding or error between parties, Openreach expects CPs to place the necessary orders on Openreach systems to remedy the situation i.e. Openreach will no longer offer an urgent service restoration process.
8. C7.6 b)⁵ requires that Number Portability is provided for a minimum of one month after the date of termination by the Switching Customer of the contract for the provision of the Relevant Communications Service(s). Openreach has already delivered Right to Port functionality which enables compliance with C7.6 b).

iii. General points of principle

9. We note that Ofcom's consultation seeks comments on the proposed changes to the specific General Conditions, however Openreach would also like to take this opportunity to reinforce the following points which we consider will be crucial to the successful implementation of One Touch Switch.

Scope of services utilising One Touch Switch

10. Product scope: Openreach will be operating a single process and will apply it to all products in scope, irrespective of whether it is for business or residential use, for example MPF will be subject to One Touch Switch regardless of the customer type⁶, whereas Ethernet services will be out of scope.
11. We support Ofcom's objective of enabling switching to be quick, reliable and easy for end customers. With this in mind we would urge Ofcom to seek to ensure all services are included in the switching process to fulfil this objective. Importantly if pay TV services, which are frequently included as part of a bundle together with voice and broadband, are not included in the One Touch Switch process, then the customer experience will be undermined. For example a consumer who wishes to switch their voice, broadband and pay TV to a new provider will be required to switch their voice and broadband via One Touch Switch but will need to contact their Losing Provider to cease their pay TV service. If the Losing Provider consequently 'saves' the consumer for all or any of the services after consent has been provided and the order has been placed, then the consumer will need to re-contact the Gaining Provider to cancel the new services.
12. In addition, a key principle within the EECC and Ofcom's switching document is that of any process needs to be Gaining Provider led. By excluding pay TV in One Touch Switch, the process is not Gaining Provider led and therefore does not accord with the requirement for switching to be "quick, easy and reliable" and in this respect does not meet Ofcom's policy objective for seamless switching between operators. Rather, the exclusion of pay TV leads to increased complexity, confusion and inefficiency within the industry.

⁴ Ofcom's Statement and Consultation Page 70

⁵ Ofcom's Statement and Consultation Page 70

⁶ Openreach will not be aware if the customer is residential or business

13. Even if the pay TV service is not dependent on the underlying Broadband service for its delivery, there may well be financial/commercial incentives/benefits of having the pay TV service associated with the Broadband service i.e. as part of a bundle. These would be lost if the bundle was split and the products were provided independently.
14. Furthermore consumers will have less confidence in the One Touch Switch process so they will be deterred from using it again.

Ensuring network efficiency and encouraging streamlining of processes

15. One important principle in enabling a switching process is to ensure that UK networks are used as efficiently as possible and therefore the potential for CPs to mistakenly request 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.
16. Another principle is to ensure that the new process requires the losing CPs to tag the asset to be switched so that:
 - a) Openreach can maximise re-use of existing networks;
 - b) The right asset is switched in a multi-line dwelling unit; and
 - c) Industry develops a simpler and more efficient process.
17. As we understand from Ofcom's document the introduction of One Touch Switch means that there will no longer be a requirement for urgent service restoration. This is based upon the assumption that there will be a reduction in minimum lead times. If the switch was placed in error, then the CP will simply place a new switching order. Charges would still apply as we would treat this as a new request. Note that Gaining and Losing CPs/retailers will have to work out how they manage issues associated with holding to term arrangements etc and liaise with the end customer accordingly.
18. We note the requirement in Ofcom's document regarding compensation⁷ as follows:

C7.47 Regulated Providers shall provide Switching Customers with compensation in an easy and timely manner in the case of failure to comply with the obligations laid down in this Condition C7, as well as any missed service and installation appointments.

19. Openreach currently pays both Standard and automatic compensation SLGs which include payments for missed service or installation appointments. Therefore Openreach will continue to follow current rules for when Openreach fails i.e. there will be no new SLG requirements for Openreach in relation to switching. Note we will continue to pay the CP with whom Openreach contracts for the purposes of paying SLGs as we will not be able to see who the retailer is (only the CP will be able to pay the retailer accordingly).

Migrations and other processes

20. In relation to Porting implications and considerations, we are open to discussions on including porting into the One Touch Switch process. Inclusion of number porting into the process is an integral part of

⁷ Ofcom's Statement and Consultation Page 80

the end customer migration.

21. We note and welcome Ofcom's confirmation that the process for provider-led migrations will not change and will not be subject to One Touch Switch as per Paragraph 4.12 below. This will support change of technology/service migrations such as from copper to fibre.

4.12⁸ We confirm that the new switching process will not apply to provider-led migrations (including those referred to by Openreach), including where these would involve a change of underlying wholesale provider. The purpose of the new switching rules is to protect customers and support switching at the retail level.

22. We also note and welcome that Ofcom has confirmed that there are some processes which rely on the 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.

5.3⁹ In addition, we [Ofcom]: confirm our proposal to remove the Notification of Transfer process from the GCs (but retain working line takeovers following a home move request on the Openreach and KCOM networks)

Implementation

23. In order to meet the April 2023 implementation deadline, Ofcom is asking industry to start dialogue immediately and has asked the OTA2 to develop a detailed implementation plan to kick start the work. Openreach will again be an active participant advocating the need for clear requirements, development, testing the development and piloting the solution across industry before final implementation.
24. The speed of decision making is essential to achieve the implementation date of April 2023. All players (Industry, Openreach, Hub) will have to agree/commit to development and testing to the same timelines.
25. 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. A key dependency on the One Touch Switch process launch date will be the approval to exit testing.

⁸ Ofcom's Statement and Consultation Page 35

⁹ Ofcom's Statement and Consultation Page 75