



Response to Ofcom's Consultation on Quick, easy and reliable switching

Shell Energy Retail Limited (SERL) welcomes the opportunity to comment on this consultation. SERL has been in the business of providing fast, reliable broadband to thousands of customers across Britain for a number of years. Our priority is to help our customers access cleaner, convenient and competitive home services; and to provide solutions that will help them to reduce emissions.

Overall, we remain supportive of Ofcom's proposed approach for improving the switching process for consumers as it creates a cross-platform environment to take account of Cable providers and new FTTP providers. We agree with Ofcom that people should be able to switch their telecoms provider easily in order to take advantage of the range of services available.

As we have highlighted previously, it is important that Ofcom appreciates the different supply chains that exist within the market in designing a solution and setting implementation deadlines. As a large reseller of telecoms services, we believe it is vital that Ofcom take into account the complex nature of the operational systems that exist between the different parts of the supply chain.

The "One Touch Switch" approach

We support the concept of 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. In contrast to the "Code to Switch" method, which requires the customer to contact the losing provider, the "One Touch Switch" method means the customer only needs to contact their new provider in order to switch their service. We believe that the requirement for a customer to obtain a key from their losing provider would introduce a large element of friction in the switching process.

Ofcom's proposed method could potentially reduce the switching time and reduce the risk of loss of service during a switch which is clearly beneficial for consumers. It would also help ensure customers are provided with the right information before consenting to a switch and include protections against them being switched without their consent.

Implementation

It is unclear at this point whether resellers like Shell Energy will need access to the hub themselves, or will need to have an interface with their wholesale network. We support the OTA's efforts to implement the new switching process in time for Ofcom's deadline of April 2023 however we urge both Ofcom and the OTA to be mindful of the volume of different providers that need to be involved in these discussions. Smaller providers have fewer resources to implement changes, and resources being diverted away from day-to-day work are likely to have a much bigger impact on them, especially during a time when significant change has to be implemented for the EECC by June 2022. It is therefore important that

smaller providers are still consulted and engaged in the implementation discussions and that the final technical design works for everyone including small retail providers, wholesale network providers and resellers. There will need to be appropriate governance in place to ensure that all reasonable views are noted and discussed in an open and transparent fashion whilst being balanced with the need to not overly delay decision making. An agile programme approach will be required which is scaled for both small and large scale providers equally.

Implementation deadline

We are supportive of implementing this quickly in order to give consumers a better switching experience however we believe that Ofcom's implementation deadline is optimistic given the complexity of what needs to be agreed and designed. As Ofcom notes, there are vast volumes of data being processed that will need to be thoroughly considered. There is a risk of regulatory slippage that has a cost. Given that the OTA has already commenced implementation discussions we would ask that Ofcom attend these discussions and seek counsel from the OTA on what would be a more realistic timeframe for implementation.

We also ask that Ofcom and the OTA acknowledge the role of resellers in the market who depend on their wholesale provider to design and implement a solution that they can then build a customer facing platform around if it's not commercially viable to link directly into the hub. SERL is concerned that there is no control on the time allocated to resellers to build their customer facing systems accordingly as the focus of the proposals is currently on the network.

Ofcom makes it clear that they will be able to take enforcement action against any provider that is not complying with the rules however it is not clear where the responsibilities lie in relation to the implementation of a One Stop Shop solution. We believe that Ofcom needs to work closely with the OTA to provide guidance on where these responsibilities lie in often complex supply chains.

Costs

Although Ofcom have received high level indicative costs from industry they note that these estimates do not necessarily reflect the costs that would ultimately be passed through to consumers and the cost estimates submitted by providers contain a degree of uncertainty. It also does not reflect the costs that would be passed through to resellers such as SERL. We hope that as the OTA discussions progress, a more accurate view of the costs will develop and a further discussion can be had on how this will be balanced across the industry.