



Quick, easy and reliable switching

Vodafone UK submission

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Vodafone is a technology communications company that connects people, businesses and devices to help our customers benefit from digital innovation. We operate in 21 different countries, with partner markets in a further 49. Our services span mobile, fixed line connections, home and office broadband, and the Internet of Things (IoT).

We believe everyone has a right to enjoy the benefits of a more connected, digitally enabled world. No-one should be left behind. To allow consumers to benefit from Vodafone's significant investments, innovative products such as Vodafone Pro and to experience our most reliable network ever, it is essential that effective and efficient switching processes exist across industry.

Ofcom has elected to implement its preferred One Touch Switch process and is consulting on essential changes to the General Conditions to ensure an effective process is delivered to consumers. With this in mind Vodafone is concerned, not so much by what is included, (the changes reflect Ofcom's earlier statement), but rather what has been left out once the Notification of Transfer rules are removed:

- Cancel Other / Failure to cancel.
Key consumer safeguards to tackle abuse of the switching process and the use of which has itself been abused, have been delegated to industry to replicate absent of any regulatory requirement.
- Ofcom's press releases proclaim switching "in as little as a day"¹ yet the removal of the current Openreach and KCom 10-day transfer period has not been replaced by an equivalent to support one day exports. We call on Ofcom to make this an explicit requirement.
- Mobile Broadband and Fixed Wireless Access.
The decision to include Mobile Broadband and FWA as part of the fixed process switching process needs greater consideration. It is not sufficient to have a regulated process determined flexibly based on whether the device is used at a single location or not. Ofcom concludes that FWA is being provided at a fixed location and therefore must be part of the fixed process. But that assumes that the mobile operator has sold the entire FWA package to a fixed location. There is nothing to stop a customer from purchasing a SIMO package, particularly considering the offers in the marketplace today, and simply inserting the SIM into a third-party supplier's router unbeknownst to the mobile operator. In such circumstances should a customer use the fixed or mobile process to switch?

Vodafone calls on Ofcom, in its next statement, to explicitly signal its expectations of industry in relation to the desired end-state of its future switching process. Previous imprecise language as to what Ofcom may "envisage" is unhelpful. Whilst acknowledging that Ofcom does not wish to constrain industry, now is the time for Ofcom to explain what it considers to be the end state of the switching process, and particularly the third-party hub:

¹ <https://www.ofcom.org.uk/news-centre/2021/simpler-broadband-switching#:~:text=Broadband%20and%20landline%20customers%20will,process%20announced%20today%20by%20ofcom.>



- Is it to be connected to by all retailers?
- Will it form the future foundation of a common numbering database;
- or improved porting mechanism;
- or be integral to STIR implementation?

Vodafone calls upon Ofcom to share its holistic vision so that industry can plan accordingly and so avoid costly re-work and delay.