Your response

Question	Your response
Question 1: Do you agree with our proposal to require providers to develop and implement the One Touch Switch process?	Confidential? – No Yes, we agree with Ofcom's proposal to develop and implement the One Touch Switch process for the following reasons.

Webster Marketing is a consultancy advising organisations in the internet industry, specifically those in the altnet sector. The principal, Mike Locke, has been in the internet industry since 1996, ran a specialist satellite ISP from 2000 to 2016, and has been working with INCA and INCA Members in the altnet sector since then.

Part of this rôle has involved work on Ofcom's WFTMR, the industry collaboration on GPL Switching via the Office of the Telecommunications Adjudicator, the various consultations on GPL Switching by Ofcom and DCMS, and other industry bodies.

1. We are in agreement with this Ofcom statement and that "One Touch Switch" is Ofcom's "preferred approach" to providing "Gaining Provider Led" switching for consumers to access more competitive services more easily.

2. We agree with Ofcom's reasoning as to why One Touch Switch will be easier for the customer to use. Once the customer has contacted their chosen new provider (GP), the CP will do everything else that's needed to co-ordinate with the losing provider (LP) via the OTS Hub for a successful and timely switch. It's very easy for the customer and, therefore, supports a competitive marketplace. It means the customer is more in control of their communications with the LP, indeed, they would not have to contact them at all if they don't want to, thus avoiding the opportunity for unwanted save activity.

3. When the Customer requests a Code, this does not initiate a Switch Process. Until the Gaining Provider is informed of a customer's wish to switch, no Switch Process can or will start. Under CTS, a customer could request a code from the LP and then do nothing for whatever reason: customer retention, inaction and so on. No Switch Process has been initiated in this scenario. Adding an IVR does not materially change this: it just adds another channel by which a customer could request the Code necessary as a preamble to later starting a Switch Process.

4. We therefore believe that the Code to Switch option does not meet Ofcom's criteria and therefore should not be considered for implementation. We note that a revised Code to Switch specification was published by Ofcom, but we do not believe that the addition of an interactive voice recognition (IVR) would overcome the significant issues that Ofcom has identified with the Code to Switch option, and with which we agree.

5. We agree that One Touch Switch would be easier to use than Code to Switch being simpler to understand and follow, be familiar to users of NoT, give greater control to customers, avoid difficulties of using the channels (now including IVR) to interact with the Losing Provider and, therefore, adding an IVR does not materially impact the conclusions in 1.16 (CTS not as effective as OTS) and 1.17 (CTS harder than existing switching arrangements). We have some specific comments on IVR later in this response.

6. We note that the December 2022 deadline for OTS will be challenging for the entire industry to meet given that Ofcom's final statement and GCs are not yet formally issued, and given Openreach's estimated development timescale for "Option Y" (OTS) as included in the OTA2 submission even though this timescale was significantly shorter than that for "Option X" (CTS)

7. The need to establish a funding and governance framework for the organisation providing the hub services will add to the time required for implementation of the new switching platform.

To address IVR specifically, we would make the following comments:

8. Just adding an IVR as one of the channels is not a material change to the fundamental character of "Code to Switch". The reasons for this have been analysed in Ofcom's statement and remain unchanged.

9. It still requires the customer to request a Code prior to initiating the switch with the Gaining Provider. This is different in principle to the customer placing an order with the Gaining Provider who then organises everything else. In Option X, customer must ask for a Code and can only then place the Switch order once that code is available and validated. Hence "Code first, then Switch" as opposed to "place Switch order" as designed by Option Y, "One Touch Switch".

10. The Losing Provider is informed of the customer's wish to switch ahead of the Gaining Provider and must take action before the customer can place Switch order.

11. Even with an IVR as one of the channels of comms, this still gives the technical opportunity for a trigger for customer retention activity by the LP ahead of the customer placing the Switch order with the GP.

12. IVRs are not common channels within the independent sector for switching. Having to develop and implement an IVR would, therefore, be a disproportionate burden on many network operators both in terms of financial and technical resource and changing their business process with the training and timescale that implies.

In summary, even as amended, the Code-to-Switch process still represents one extra layer of customer action before a switch can be initiated. The One Touch Switch was Ofcom's preferred approach for this, and many other, reasons. We do not consider that the balance of this evaluation is materially changed by the addition of an IVR to the other customer communications channels in the original Code-to-Switch proposal.

As a point of information, the Executive Summary of the amended proposal states incorrectly that "From the outset of these discussions, one, credible, code-based candidate solution ("Option X") has been the foundation of those discussions". That may be correct for discussions between 2 of the parties, Sky and Virgin, and Ofcom. but is far from the case for the majority of the industry. It is a matter of record that all other parties in the OTA2 Working Group supported the non-code Option Y.

Question 2: Do you agree with our proposal to remove the rules relating to the existing Notification of Transfer process?	Confidential? – N Yes. This provides one set of requirements for the entire industry.
Question 3: Do you agree with our proposed changes to require mobile providers to give residential customers information regarding the impact of a switch on any other services they have with the losing provider?	Confidential? – N No comment.

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