



FAO: Ofcom

by email only to: switching@ofcom.org.uk

Re: Consultation, Quick, easy, and reliable switching

Dear Sir/Madam

I am writing in response to the above consultation.

Zen Internet is supportive of Ofcom's proposal for a 'One Touch Switch' Process and we believe this will provide improvements that will benefit residential customers who wish to switch providers easily and reliably.

Having looked at the proposed industry solutions to date, our preferred option at this time would be for the 'One Touch Switch' rather than the 'Code to Switch' proposal.

Both proposals will impact our business and bring challenges however as we have already invested significantly in the Gaining Provider Led Switching process that replaced the MAC code process back in 2015, we believe the 'One Touch Switch' will be the better of the two options on the table at this time.

We do have several concerns that we would like to make Ofcom aware of about what is being proposed, as follows:

1. Timescales for compliance

CP's have yet to work through governance arrangements and assuming that is done quite quickly we would still be uncertain of which proposal Ofcom will confirm until it issues its final statement approx. September 2021.

Assuming Ofcom select the 'One Touch Switch' process it would only provide CP's with approximately 12 months to complete all the work needed to be ready for the 19th of December to become compliant which we think at this stage is wholly unrealistic.

When Zen worked with Ofcom and Industry colleagues to build the Gaining Provider Led (GPL) process back in 2015, we needed a good 18 months prior to that work to make all the changes necessary to become compliant indeed I recall entering into discussions in March 2011.

This required a significant amount of resource and project management within our business despite having many other projects in the pipeline at that time and albeit we delivered it meant other projects were delayed as a result. This latest proposed change is significantly more challenging for CP's than the work we did in 2015 and we expect it will bring complexity that is likely to require some effort to overcome.

This isn't a straightforward one size fits all proposal but one that requires a multi-stakeholder, multi-



platform engagement effort if it is to be delivered on time and relies heavily on collaboration between industry and third-party operators (currently unknown) providing the hub.

It should also be noted that we are being tasked to do this while CPs are working through an unprecedented global COVID-19 pandemic, that has impacted many CPs especially resource availability with no realistic expectation of when it will end.

We would also point out that the deadline of 19 December comes the week before the Christmas bank holiday period. This is a time when CPs work with reduced staffing and are likely to have a change freeze in place where changes to network infrastructure and systems development will cease for the duration of the holiday, this is done within Zen to minimise any service affecting issues from occurring during the holiday season when staff availability is limited..

To introduce a completely new way of switching for customers at this time could also lead to confusion for residential customers as they struggle to understand these new changes and at a time when customer facing service departments are running on reduced capacity.

Given the challenges the new process might present it would be better to at least introduce the changes at a time when provisioning and service teams can be fully staffed and operational to avoid increases in harm and unnecessary frustrations for the customer and our business.

2. Matching services to be switched

In the Cartesian report it assumes the customer knows who their Losing Communications Provider (LCP) is. Is this a safe assumption to make? If the customer doesn't know who its LCP is, is it impossible for them to switch?

Do these present scenarios where the customer might not know this, or find it difficult to obtain? For example:

- Tenant gets broadband provided as part of a communal service but wants to take it on themselves to get a broadband / phone / TV bundle; they might have to get the LCP from the organisation that runs the communal service (who might get it from some parent company).
- Broadband is ordered by another family member and they're unsure who provides it; they would be reliant on the other family member to be able to find it out.
- A business has broadband supplied into a building, but it was installed and set up by some other part of the company that's several management layers away.

The Cartesian report also assumes a 99% match rate based on UPRNS (96% otherwise). This raises a serious concern for Zen as UPRNs aren't commonly used today for phone lines and broadband.

Identifying a service to move via UPRN would require the gaining *and* losing provider to have UPRNs recorded against the service something that many providers will not have done to date.

This would partly be due to the fact UPRN datasets have to be purchased and are expensive. One option might be to have an industry wide UPRN dataset that could then be introduced that is done under a shared cost model and with the dataset also shared.



The Cartesian report includes a paragraph that appears to imply that industry should switch to UPRNs for the Option 'One Touch Switch' if that is correct it immediately raises the question of, who pays for the UPRN datasets? Would this be something that the HUB provides?

Fall back to other options if UPRNs can't be used is also likely to be problematic.

The Cartesian report refers to phone numbers which we know full fibre services do not have nor do they need to nor indeed would SOGEA.

Furthermore, it will no longer be included as a part of broadband in approx.3 years from the implementation deadline. Realistically this means account numbers only, which has its own set of problems.

For example, here at Zen there's multiple things that may well be treated as an 'account number' (and frequently are used to identify customers) such as:

- A sales order id, sales order item id, order reference number, invoice number, contact / site / org id, customer unique username. We would assume other CPs will have similar issues here.
- And what if they bought from a reseller? Is the account number the one they have with us in that instance? Even though they didn't place the order with us.

3. Switching implications

In the Cartesian report it references this coming from the LCP; what if the LCP gives incorrect information, perhaps they don't have enough information to work out the impact to the customer, or they work it out incorrectly. Where would the legal responsibility lie?

4. Lead time calculations

The consultation proposal mentions the desire for as quick a switching as possible, but it's not clear how lead time is worked out. The Cartesian report seems to imply it's a combination of LCP and Gaining Communications Provider (GCP)? if the LCP is involved, is there a risk an LCP could abuse this?

5. The HUB

The introduction of a 3rd party, independent hub on the face of it looks like a good move however we have several technical and security concerns as follows:

- How will Ofcom ensure that there will be no conflict of interest with the HUB provider?
- Has Ofcom considered what SLA's the hub will have to provide and what will CPs have to provide in return?
- Will there be any incentives to meet the SLAs or penalties for not meeting them?



- Data Protection/GDPR security is essential and we are worried that rogue elements may gain access to data that is confidential to each CP. How will this be addressed given the likelihood that this data could be exploited commercially should it be accessible to a competitor?

- **Technical feasibility**

The hub will presumably need access to our systems 24/7 and availability will be required all year round. Running services 24/7 in a reliable manner is *relatively* straight-forward provided some care is afforded to it but it does come at a cost, a cost that we have yet to determine.

We are assuming at this stage that there will probably need to be standard architecture that every CP adheres to and you just 'plug' this into the hub.

However, the difficult bit is ensuring our systems can provide the right information back 24/7.

For Example:

Consider someone wanting to migrate their broadband via the hub, the hub requests information from our API but to return that information, the API needs information from our asset records, customer records, etc. This means *all* those things also need to be available 24/7.

- **Architectural consideration and trade-offs**

- For example, a common approach is to push copies of the relevant records out to a cloud store but then it needs to consider how often it's pushed (i.e., how up to date is it) and this leads us to what SLAs we need to meet, what's acceptable, etc.
- A primary concern for us is working out lead times and switching implications.

For example, if we must provide **"this will be your charges, that you were last billed on this date, you'll need to pay £x"** then checking on customer information, matching to asset records is a simple and straight-forward process however anything involving complex calculating may not be so straightforward and easy, especially if it involves calculating payment data of what the customer needs to pay.

Although at this stage we believe it is technically feasible for Zen to do this work, we would caveat that with:

- SLA requirements are currently unknown, and we are unsure what will be required as being acceptable in terms of exactly how up to date all the information we provide through the hub will have to be. The more stringent these requirements, the more costly a solution will be to build and run for us.



- Providing information that relies on billing information (e.g., ETCs) is always more complex than you expect and again depending on what will be expected it's hard to determine what we need to do at this stage.
- We would also need to factor in the ongoing costs to Zen to monitor and operate the system.

6. Technical feasibility concerns for wider industry

Smaller CPs (and large ones for that matter!) might use a Third-Party Integrator (TPI) to integrate with the hub but the hub still needs information that only the CP's systems have and needs it 24/7. A CP could integrate to the TPI and have their systems be available 24/7 which is probably going to be a challenge for a lot of CPs to start with given the history of the industry, and probably too costly for smaller CPs.

So CPs going via a TPI will probably just push the relevant data to the TPI on a periodic basis.

- E.g., every hour they push to the TPI asset and customer records, and the TPI handles any requests from the hub using the data that has been pushed to it.
- This will likely mean the data in the TPI might not be fully up to date, but does simplify things a lot, especially for smaller CPs. This again leads us back to the questions that will need answered in relation to what SLAs will be required to meet?

7. Business Customers

While Zen understands that this consultation is intended to provide a residential only switching process, we cannot ignore the fact that it excludes business customers.

We provide services to business users from sole traders right up to enterprise customers and we are concerned that the work we are going to have to do now to satisfy the residential market will require further investment and development at a later date and one that may well introduce further complexities should business customers need to be included.

CPs are already working under difficult circumstances with a national pandemic and any further changes introduced at a later date that might well be better considered now could have a detrimental impact on our business.

The business sector of course would introduce a greater degree of complexity however as industry will already working to deliver a One Touch Switch surely it makes sense to do this for all customer switching scenarios now rather than having to revisit and change systems etc. again further down the line.

With regard to the recent late addition of further detail from the Option X proposal and the suggested introduction of IVR, we have no view on this at this time other than to say we think it is likely to introduce another layer of complexity and cost and we would have to understand more about this option to determine the technical feasibility and the likely financial implications.

Indeed some CP's may not have the luxury of having an IVR system or indeed one that is flexible or capable of introducing the changes required with an increase in investment.



We are fully committed to working with Ofcom, Industry colleagues and the OTA to find a way to deliver a robust and secure 'One Touch Switch' process and would urge Ofcom to consider the timelines needed to achieve this.

To rush in a solution could have a disastrous impact on residential customers and our businesses if we are not given sufficient time to achieve this.

Nothing in this response is confidential.

Yours faithfully,

Gary Hough
Regulatory Manager