ITSPA Response to Ofcom's Proposed Plan of Work 2021/22

About ITSPA
The Internet Telephony Services Providers' Association ("**ITSPA**") represents over 100 UK businesses involved with the supply of next generation communication services over data networks to industry and residential customers within the UK. Our traditional core members are VoIP providers. ITSPA pays close attention to both market and regulatory framework developments on a worldwide basis in order to ensure that the UK internet telephony industry is as competitive as it can be within both national and international markets.

Please note that certain aspects of the ITSPA response may not necessarily be supported by all ITSPA members. Individual members may respond separately to this consultation where a position differs. However, the ITSPA Council is confident that this response reflects the views of the overwhelming majority of ITSPA members.

A full list of ITSPA members can be found at http://www.itspa.org.uk/.

Response
ITSPA welcomes the opportunity to respond to Ofcom's proposed plan of work for 2021/22. As the consultation itself is broad and summarises all of Ofcom's planned work for the year, ITSPA's response will focus on the following topics and recommendations, which are of high interest to our members.

Topics:
- IP migration.
- Number Portability for business Subscribers.
- The appointment of a business champion within Ofcom.

Recommendations:
- Ofcom to secure further information on plans and timescales for the PSTN switch off from Openreach.
- Ofcom to recognise need for a nationwide communications plan on the PSTN switch-off and to work with Government to deliver a plan.
- Ofcom to commit to developing a new plan for the reform of number portability as part of their Plan of Work 2021/22.
- Ofcom to give the OTA a clear mandate for addressing Number Portability.

IP Migration
ITSPA is actively engaged in a number of regulatory workstreams surrounding IP migration and the switch off of the PSTN, and is aware of the steps that Ofcom has taken on these issues so far. However, ITSPA would question Ofcom's approach towards this process and impress the urgent need to implement a nationwide communications plan on the switch-off to ensure that the public, business and other organisations are adequately prepared for the changes.

ITSPA's major concerns on the switch off are focused on three key areas:
i. **A lack of clarity from Openreach** on the exact plans and timelines surrounding the migration of existing customers as well as the uncertainty regarding the deployment of specific new product lines that will replicate existing telephony services as well as ancillary services in an IP world. This lack of clarity is harming the sector's efforts to prepare for this momentous change to the industry. This jeopardises a smooth transition for customers as well as

undermining the competitive nature of the telecoms industry. We would urge Ofcom to intervene to force Openreach to provide this much needed clarity.

ii. **The lack of communications plan from Government, Ofcom or Openreach.** ITSPA has frequently raised the point that the PSTN switch off is larger in scale, complexity and impact than the digital TV switchover of 2007. This switch had a substantial nationwide awareness campaign attached to it to publicise the changes and ITSPA is disappointed that nothing similar has been planned by Ofcom, Government or Openreach for the PSTN switch-off, despite multiple calls to do so. The PSTN switch off will not only impact telephony calls, but also many other services which rely on this technology, such as alarm manufacturers and telehealth technology. It is imperative that the changes are communicated properly. Current communications initiatives in place such as a the BSG website, OTA best practice guidance and individual CP communications are not sufficient given the scale of the changes and their potential impact on consumers and businesses across the UK.

iii. **The potential impact to the telecoms landscape** if a suitable regulatory framework is not implemented by Ofcom in time for the PSTN switch off. It is essential that wholesale telecoms services (many of which are predominantly used by businesses) can be reflected in an IP environment without a significant increase in cost. This will help maintain a dynamic and competitive industry that will drive the UK's economy forward as the UK recovers from the coronavirus pandemic and adapts to its new role having left the EU.

Number Portability for business

Ofcom will be aware of ITSPA's long-standing position that Number Portability for business (including not-for-profit, local and central government) subscribers is operating in a sub-optimal way. ITSPA members were very supportive of Ofcom's previous work to find a solution to the harm experienced by our members and were heavily involved in the testing for the proof of concept on Blockchain. However, with the recent conclusion that Blockchain is not yet fit for purpose, and the lack of inclusion of number portability within the scope of the Plan of Work for 2021/22, we find ourselves no further forward today than a few years ago.

ITSPA has previously written to Ofcom providing our thoughts on three areas where Ofcom's intervention would assist in reducing the harm currently experienced by our members and we would hope that it would be considered within your work this year.

The three areas are:

i. **The reluctance of vertically integrated residential operators.** It is well known that the major residential networks have a single-line portability system that allows switching of voice customers between them. This appears to work most of the time effectively for residential fixed voice switching and it is our experience that the residential divisions often hold the "casting vote" so to speak on various matters, leading to a deficit of investment and attention in business Subscriber systems and procedures. Whilst multi-line fixed voice switching may be a small percentage of the numbers traded between large residential operators, they represent a significant volume (both in relative and absolute terms) for our members, who are almost all exclusively focussed on serving businesses.

ii. **The effectiveness of the Office of the Telecommunications Adjudicator ("OTA") and its work groups.** Whilst ITPSA members appreciate the hard work of the individuals at the OTA, we feel their mandate for porting needs to be much clearer to be effective. When the OTA is given a clear mandate, it has proven able to resolve industry issues. On porting it requires the necessary direction and support from Ofcom to work through the various issues to make sufficient progress.

iii. **The lack of clear guidance from Ofcom on expected Subscriber outcomes.** We believe that Ofcom's reliance on the industry, in the first instance, to solve issues is well intentioned but

the lack of clear guidance from the regulator on specific and desired outcomes does not aid in achieving that objective. Until Ofcom makes it clear what is reasonable in terms time taken to change voice providers there will be a stalemate. Ofcom needs to take the lead here and been seen as an active partner to deliver the necessary goals.

We encourage Ofcom to reconsider the lack of inclusion of number portability within its plan of work for 2021/22 and consider our suggested areas of focus to resolve the harm experienced by our members.

The appointment of a business champion within Ofcom
While there are many industry discussions which incorporate both residential and business requirements there is still little grasp or specific action towards the complexities and timescales of businesses in order to implement the change.

ITSPA and the wider telecoms industry has requested the appointment of a 'business champion' within Ofcom for some time and we received positive assurances from Ofcom last year that such an appointment was on the cards. The above issues highlight the need within Ofcom for a better understanding of the needs of the complex business supply chain.