

Cristina Luna-Esteban

Director, Telecoms Consumer Protection

Networks & Communications

Direct line: 020 7981 3339

Email: [Cristina.LunaEsteban@ofcom.org.uk](mailto:Cristina.LunaEsteban@ofcom.org.uk)

Open letter to One Touch Switch  
Implementation Progress Steering Group and  
residential communications providers in scope  
of OTS rules

5 April 2023

## One Touch Switch Implementation Progress Steering Group (IPSG)

One Touch Switch (OTS) became a requirement for all residential fixed broadband and voice providers on 3 April 2023.<sup>1</sup> Given industry's failure to implement the new process on time, Ofcom has opened an enforcement programme (EP) to make sure that providers deliver OTS to a high standard, and in accordance with the agreed specifications, as quickly as possible.<sup>2</sup>

As a result, we do not consider it appropriate for Ofcom to continue to meet with providers at the Implementation Progress Steering Group (IPSG) and we have therefore decided to suspend future meetings of the IPSG.

However, we are of the view that Ofcom must remain involved and appraised of the elements of OTS which require industry coordination and collaboration, and which are being delivered via the One Touch Switching Company (TOTSCo). These aspects do not form part of the EP itself, as the EP<sup>3</sup> is focused on individual providers' preparations, but they are of importance and centrality to delivering OTS as soon as possible for the benefit of residential consumers. In consequence, and given this continuing need for policy involvement, Ofcom is putting in place a separate programme of enhanced, regular engagement with TOTSCo, including monthly reporting, to hold it to account for delivering the OTS messaging Hub and driving forward cross-industry preparations to ensure OTS can be launched at the earliest possible date.

In addition, I have also asked the OTA2 to continue assisting Ofcom in the engagement with TOTSCo, including, but not limited to, challenging and, where appropriate, supporting the TOTSCo Board to ensure OTS is delivered as soon as possible. The OTA2 will remain an observer on the TOTSCo Board and might take on other roles, as appropriate and separate to the EP, to give Ofcom the comfort that OTS will be delivered quickly and effectively.

As a reminder of TOTSCo's role, it has been established by communications providers to deliver the OTS switching process including the OTS messaging Hub.<sup>4</sup> It is also the industry body as set out in the

---

<sup>1</sup> Ofcom, 3 April 2023. [General Conditions of Entitlement](#), of which Conditions C7.18 to C7.27 set out the One Touch Switch obligations.

<sup>2</sup> Ofcom, 3 April 2023. [Enforcement programme: Industry's failure to implement One Touch Switch by deadline of 3 April 2023](#).

<sup>3</sup> The EP will be led by colleagues from Ofcom's Enforcement team and not the same (policy) colleagues that you have been engaging with so far. The EP is separate and distinct to the engagement we will carry out with TOTSCo.

<sup>4</sup> TOTSCo [website](#).

relevant General Condition<sup>5</sup> and has been further asked by industry to help project manage the end to end testing process.<sup>6</sup> I would therefore continue to urge you to fully engage with TOTSCo to ensure you are up to date with the latest information on the steps needed to implement OTS.

Yours sincerely,

Cristina Luna-Esteban

---

<sup>5</sup> General Condition [C7.18 \(b\)](#) which refers to “any applicable industry processes as agreed by the relevant industry forum”.

<sup>6</sup> Ofcom, January 2023. *Minutes of second meeting of the OTS Implementation Progress Steering Group on 12 January 2023*, paragraphs 1-2 (as circulated to members by email on 31 January 2023).