EECC Requirements Consumer Switching & Porting

EECC Working Group (ECWG) Solution Development Journey

(September 2019 to September 2020)

Office of the Telecommunications Adjudicator

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1. Introduction

The new European Electronic Communications Code (EECC) placed a requirement on Industry to establish a new, pan-infrastructure, Gaining Provider-Led 'switching and porting' process by 21 December 2020

In their letter to industry, 1 August 2019, Ofcom declared that their preference was for industry take the lead in developing a solution to meet the EECC requirements and, to that end, commissioned OTA2 to facilitate this process and report Industry's preferred solution by the end of November 2019.

Commencing September 2019, the overall development journey can be broken down into 3 phases: -

2. Phase 1 – September 2019 to December 2019

2.1 Approach

Commencing 2 September 2019, OTA2 contacted all known industry stakeholders (including trade associations) to initiate the engagement needed to develop and agree Industry's preferred option by the end of December 2019.

A series of ECWG meetings were held with strong support and attendance provided throughout, by all the major stakeholders.

The notes and actions arising from each meeting were dispatched promptly to the wider community to keep all parties fully informed. This, in turn, helped to stimulate continuing and constructive debate amongst the stakeholder community throughout this 'formative' period.

All the meetings proved to be very open and frank with all parties contributing fully.

2.2 Outcome & Deliverables

To help focus the discussion, the group developed a shared view of the 'base capabilities' which any candidate solution would need to demonstrate in order to be viewed as a 'fit for purpose' switching & porting process (**Appendix A - Base capabilities matrix - Template refers**).

Half-way through this initial phase, it emerged that Stakeholder views around the table were clearly divided with one group proposing a 'Two-stage' GP-led solution (Option X), whilst the other group proposed a 'Single-stage' GP-led solution (Option Y).

The primary difference between the two options related solely to the way in which the Customer places their switch order (i.e. the front-end). Beyond that, the fulfilment journeys for each of the proposed solutions were very similar.

Further attempts to secure ECWG consensus around a single solution were fruitless with both groups choosing to argue their cases and cement their respective positions.

Another option (Option Y+) was also considered and was a variant of Option Y. This option was discounted subsequently.

To conclude this phase, OTA2, on behalf of ECWG, submitted the following documents to Ofcom on 18 December 2019; -

i.   ECWG-Final Report-v3.1

ii.   EECC Switching Solution Options (Process Descriptions and Impacts)

iii.   Individual critiques were produced by each of the advocate groups (i.e. X group, Y group, plus Openreach) for each of the 2 solutions proposed (**Appendix B - Key characteristics critique – Template**)

iv.   X critique on Option X

v.   Y critique on Option Y

vi.   X critique on Option Y

vii.   Y critique on Option X

viii.   Openreach critique on Option X

ix.   Openreach critique on Option Y

3.   Phase 2 – January 2020 to March 2020

Further to the final report which OTA2 submitted to Ofcom on 18 December 2019, Ofcom subsequently wrote to OTA2 and Industry on 20 January 2020 requesting further work be undertaken by industry to provide more detail regarding the 2 solutions proposed (including costs and timescales), and to submit revised proposals to Ofcom by 28 February 2020.

3.1   Approach

OTA2 hosted an initial 'Take 2' kick-off briefing (23rd January 2020) involving the entire ECWG stakeholder community.

Both groups recognised the importance of providing a lot more detail to underpin their respective proposals, as this would enable Ofcom to undertake a more informed assessment than would otherwise be the case.

Despite concerns expressed regarding the resources needed to satisfy Ofcom's request in such a short timeframe, the group agreed the following approach; -

i.   The 2 groups (X & Y) would work separately on their proposals throughout the period.

ii.   OTA2 would immediately organise a series of workshop sessions spanning the period to end-February 2020 and dispatch separate invites to the individual X & Y group participants.

iii.   Each group would 'take ownership' of their respective tasks with OTA2 providing active support & direction to both groups at every stage throughout the period.

3.2   Target Deliverables

OTA2 tasked both groups to produce a revised report comprised of the following elements: -

i.   Overall Summary

ii.   Detailed customer journey description (Process Workflow diagram with associated narrative description)

iii.   Overall Process & Technical architecture

iv.   Indicative costs and timescales

3.3   Outcome & Deliverables

Despite a slow start, both groups progressively 'stepped up' to the task. OTA2 were present at all X & Y workshops balancing the need to let the 2 groups drive the discussion, whilst providing guidance regarding working assumptions, relevance, materiality, level of detail, as and when necessary.

3.4   Mid-point temperature check

At the half-way point, OTA2 instigated a mid-point review with both groups which served to identify some gaps which prompted the remedial steps needed to avoid delays or gaps in their revised submissions.

3.5   Checklist of questions

OTA2 (with Ofcom input) provided a 'checklist' of questions for each of the groups to consider in their deliberations and this was instrumental in driving the quality of their final submissions (**Appendices C & D - Checklist of Questions – X & Y**)

3.6   29 February 2020 – Revised proposals submitted to Ofcom

Both groups completed their revised proposals (minus costs and timescales) and these were duly submitted to Ofcom on 29 February 2020.

3.7   Critiques, Costs & timescales

As the 2 groups were unable to accurately assess costs and timescales until after they had established a more detailed view of the technical architecture needed to support their respective proposals, and, because both groups had yet to study each other's revised proposal, Ofcom agreed a further 2 week period for both groups to complete the following additional tasks:

i.   Provide a comprehensive 'critique' of each other's proposed solution using the 'base capabilities' template as a reference point. Critiques were duly submitted to Ofcom on 17 March 2020.

ii.   Provide indicative ROM costs (Capex and Opex – Rough order of Magnitude) to deliver and maintain the both solutions (i.e. X & Y). To help facilitate this Ofcom produced a costings 'framework' statement which OTA2 transposed into an excel 'template' (**Appendices E & F - ECWG X and Y Cost estimate – Template & Guidance documents**) which CPs used to capture a high-level breakdown of their anticipated costs.

Due to commercial sensitivities, CPs submitted their cost estimates to OTA2 on the strict understanding that their submission would be treated as 'confidential to OTA2'.

3.8   Hub Costs - Approach and Methodology

In the interests of time, OTA2 approached a number of potential vendors to request outline solution designs and 'indicative' costs to establish the 'hub' capability needed to support both X and Y options.

Each vendor was provided with the (December 2019) Final Report documents along with a 'Volumetrics' statement prepared by OTA2 (**Appendix G - Volumetrics Statement**).

The vendors were invited to assess both proposals without judging the merits or otherwise of the 2 solutions, and to provide their expert feedback on the practical 'do-ability' of deploying a 'hub' solution capable of supporting the anticipated transaction volumes.

OTA2 stressed the need for any hub solution to be secure, GDPR compliant, API and GUI accessible, and extremely resilient. The costs for such a solution to be broken down in terms of initial design, build, test and deploy (i.e. set-up Capex) and ongoing operating costs (i.e. Opex). A provisional timeline to deliver the vendor's proposal was also requested.

Despite the very short notice, 5 vendors provided outline solution designs and estimated costs which OTA2 used to derive a credible cost estimate which was incorporated into the overall cost summary.

3.9   Overall cost summary

OTA2 submitted an overall cost summary on 23 March 2020 based on the cost estimates submitted by each of the major CP stakeholders (including Openreach), along with costs associated with providing the centralised hub & TPI services. (**Appendix H - Overall Cost summary template refers**)

4.   Phase 3 – April to September 2020

At this point Ofcom proceeded with their evaluation of the 2 proposals submitted.

4.1   17 May 2020 - 'Further' questions from Ofcom

As part of their ongoing evaluation, Ofcom tabled a number of specific questions relating to both proposals and asked OTA2 to re-engage both teams to consider the questions raised and to provide a response by 8 June 2020.

To that end, OTA2 scheduled a series of conference calls with each of the groups to develop the answers needed. (**Appendices J & K - Ofcom questions for X group and Y group**).

Both Groups developed detailed answers to the questions posed and OTA2 submitted their responses to Ofcom on 8 June 2020.

4.2   17 June 2020 - Express Consent

Ofcom sent a letter to CPs to explain why, in their present view, some parts of industry's proposals did not meet the 'express consent' requirements.

Specifically, Ofcom declared that it was unclear how Option Y, as presented, met the express consent requirement of the high-level rules proposed in Ofcom's December 2019 consultation, in all circumstances.

Ofcom explained that by raising the issue now, industry would have an opportunity to suggest any amendments to their proposals prior to Ofcom's planned consultation in Q2-2020/21.

To that end Ofcom asked OTA2 to continue to work with both groups to support them in providing further submissions, should they wish to, and if so, to provide such information by 17 July 2020, or sooner, if possible.

In the absence of any further submission from Industry, Ofcom would continue to work towards a consultation using the information already submitted.

4.3   17 June 2020 – Solution Reliability & Complexity

Additionally, Ofcom asked OTA2 to investigate concerns raised (by Openreach) regarding the reliability of the proposed solutions and to share their findings, for information/feedback, with the Stakeholder groups concerned (i.e. X, Y, Openreach)

To that end, OTA2 developed a model to help evaluate the relative reliability/complexity characteristics of each of the solution architectures proposed.

The model will be shared with all parties concerned to solicit feedback.

4.4 4 August 2020 – Revised proposal from Y Group

Following protracted discussions, OTA2 submitted (to Ofcom) the Y group's revised proposal which sought to address the 'express consent' requirement, but offered 2 variants (YHUB and YGP) relating to the method by which the losing provider conveyed 'switch implications' details to the Customer to ensure they were fully informed before they were invited to give their 'express consent' to switch.

4.5 27 August 2020 – Revised cost estimates for YHUB and YGP

OTA2 asked all the major Stakeholders to revisit their cost estimates for the original Option Y, to take account of any adjustments needed to support either YHUB, YGP or both.

OTA2 collated all Stakeholder responses received and submitted a revised summary to Ofcom on 30 September 2020.

5. Number Porting

Neither group have been able to design and cost a fully integrated number porting solution as any change to the existing NP process/operation would necessitate extensive dialogue and engagement with the broad spectrum of CPs who manage porting in both the Business and Domestic markets.

That being the case, the working assumption is that the new switching process will interface with the existing porting process, although there is clearly an opportunity to exploit the new hub-based architecture to provide an integrated 'switch & port' solution. This opportunity has not been factored into any of the proposed solutions (or costs) and will need further discussion with Industry and Ofcom.

For clarity, the EECC requirement for customers' 'Right to Port' (R2P) is being progressed as a separate, OTA2 led, Industry development and is not been part of this journey.

6. Appendices

6.1   Appendix A – Base capabilities matrix

6.2   Appendix B - Key characteristics critique – Template

6.3   Appendix C - Checklist of Questions – X

6.4   Appendix D - Checklist of Questions – Y

6.5   Appendix E - ECWG X and Y Cost estimate – Template

6.6   Appendix F - ECWG X and Y Cost estimate – Template Guidance

6.7   Appendix G - Volumetrics Statement

6.8   Appendix H - Overall Cost summary template

6.9   Appendix J - Ofcom questions for X group

6.10   Appendix K - Ofcom questions for Y group