Office of the
Telecommunications
Adjudicator

OTS Matching Review - Summary

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Contents

1 Background

The OTA2 were asked by Ofcom to review One Touch Switch Matching improvement actvities after concerns that match success rates were not as high as expected.

The OTA2 conducted a structured review which engaged eight differently sized CPs. The review looked at their matching performance data, the alignment of their solutions with OTS documentation, their improvement activities and asked for their insights into causes of match failure and achievable matching success rates.

This document contains the main observations and recommendations from that review which apply to CPs and MAPs. It is expected that further insights and ideas for matching improvement will arise as CPs and MAPs continue to investigate the effectivenes of OTS matching.

CPs and MAPs are encouraged to use this report to consider what additional actions they may need to take to improve OTS matching for the benefit of customers.

In the remainder of this report, where we refer to CPs, please assume this also applies to MAPs where appropriate.

2 Summary of Observations and Recommendations

Across the participants, there were pockets of good matching performance, and some progress has been made to fix matching issues. However, we concluded that further improvements should be made by all CPs to achieve better and more consistent matching success rates in both gaining and losing scenarios.

2.1 Alignment to OTS documentation

When reviewing the causes of match failure, many of the issues we saw could have been prevented if solutions had been better aligned to OTS Matching documentation and Best Practice advice. We also found some causes that were not anticipated, and we have therefore provided new advice in this report.

We found no errors in the published OTS matching documentation.

Recommendation 1: We believe that CPs should review their solutions to ensure they are fully compliant with the OTS process, and appropriate Best Practice.

The key documents are listed below and can be accessed from the TOTSCo website:

- OTS Industry Process (Specifically for matching - sections 5.4, 5.10, 6.1, 6.2, 6.3, 6.4 & 6.5)
- OTS Matching Best Practice Guide
- OTS Message Examples
- OTS Match Request and Response Scenarios Matrix
- Lessons Learnt published on the TOTSCo website

Note that any new advice given in this report will be added to the Lessons Learnt section of the TOTSCo Website and submitted for inclusion in Best Practice Guides.

2.2 Further analysis and improvement

CPs are continuing to analyse failure messages and are introducing improvements. Some are collaborating with other CPs on match failure analysis, sharing examples, identifying problems and resolving issues.

Recommendation 2: All CPs should analyse their live matching performance, in both gaining and losing journeys, and collaborate with as many other CPs as possible to identify root causes and resolve them.

CPs are encouraged to raise suggestions for new advice that could be included in Best Practice Guides with the IPG via the OTA2 in the first instance or via enquiries@totsco.org.uk

2.3 Diagnostic and monitoring capabilities

We noted that some CPs had limited diagnostic capability, which hampers their ability to identify, understand and quantify matching issues that their customers and agents are experiencing.

Some CPs have low-level systems integration issues which result in them not responding to messages or delaying their response to messages. TOTSCo provide a comprehensive, downloadable message report that each Brand can access and use to reconcile against their own data.

Recommendation 3: CPs should consider improving their monitoring, reporting and diagnostic capability to improve their ability to identify root causes of failure and fix them. This could include regular reconciliation with TOTSCo reports.

2.4 Achievable Match Success rates

There were a wide range of views on what Matching Success Rates could be achieved, although there was general agreement that Matching Success Rates could be improved.

The OTA2 will continue work with CPs to monitor and support improvements in Matching Success Rates.

3 Avoidable Causes of Matching Failure

Many matching failure scenarios and suspected causes were described by CPs in our reviews. Some failure scenarios are valid and correct; however, many are avoidable. More causes are being discovered as CPs gain insight from live experience with real customers, agents and data. This is a snapshot of some of the key causes of avoidable Matching failure.

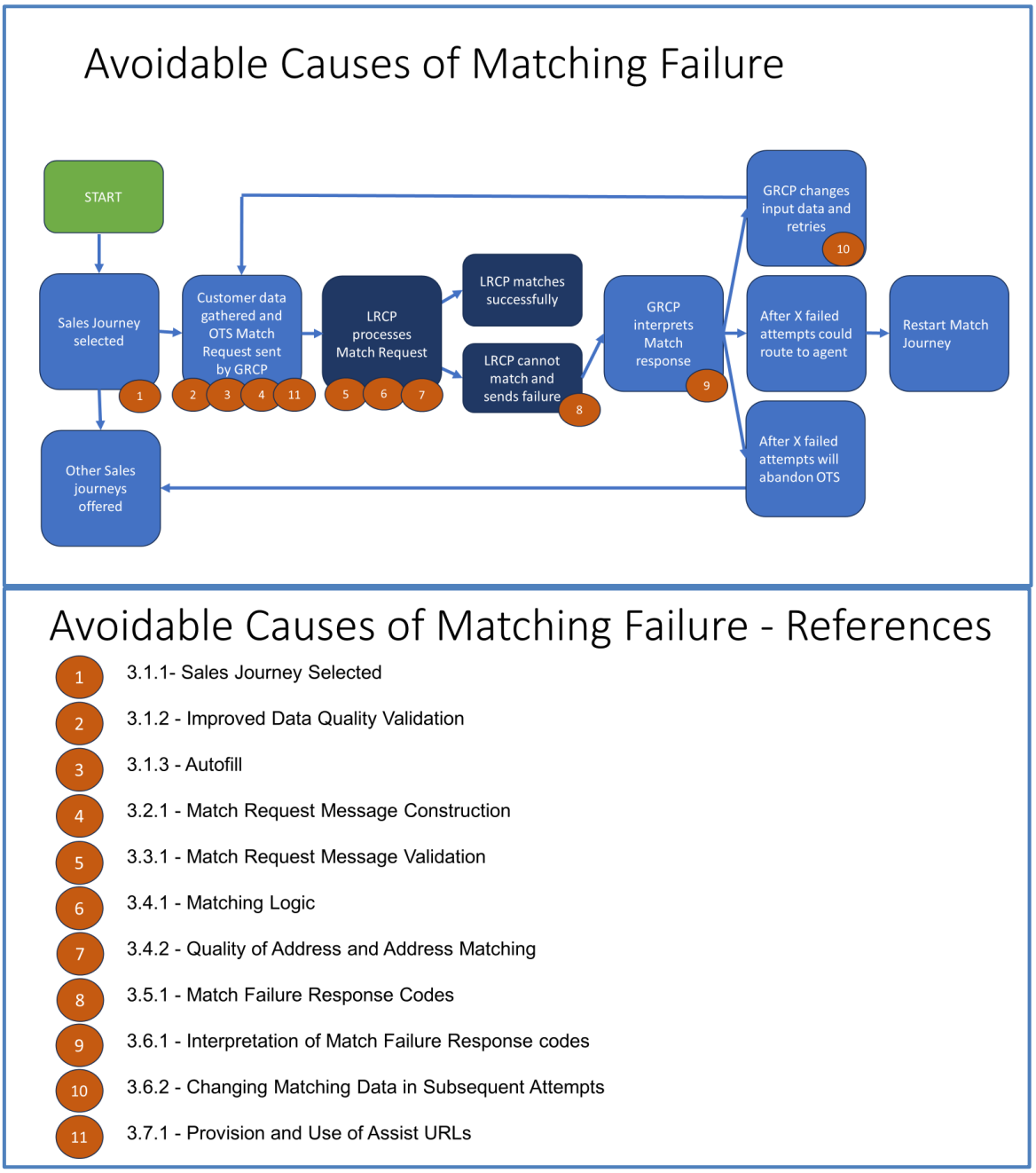

Fig 1: Matching Customer Journey showing avoidable causes of Matching failure.

3.1 **Start of Sales and Matching Journey** (Gaining CP)

3.1.1 **Sales Journey Selected** (New Advice)

Through OTA2 investigations with CPs it has become apparent that some customers do not fully understand the term 'switch' or 'switching' and can be confused when selecting a pathway to take service from a new provider. A surprising number of customers who are home-movers attempt to follow a 'switching' journey, with some CPs reporting over 15% of Match failures being due to this customer error (this is particularly evident when the Losing CP is a regional provider and receives matching requests for addresses they have never served – deeper investigations and speaking to customers discovered they were moving home).

As has been stated above, customers are not always aware of the journey their order with an CP should follow, e.g. do they need a home mover process, are they a Businesses, a new provide or are they switching? In the past, either under NoT+ for those who used it or else in simple provision journeys for others, there was little or no need for the customer to identify their required journey as this could be deduced and processed after a 'sale' by the CP. OTS has changed this and requires the RCP to guide a customer to the correct process from the very start of the contact with that customer (i.e. so that they can attempt a match, trigger sending of SI and gain 'Express Consent' if switching)

It was acknowledged that some of the current RCP UI designs for un-assisted sales journeys made assumptions that customers knew which order path to take and would always select the correct one, or that a basic logic could drive the customer to the correct outcome – this has resulted in an identified volume of 'switching' journeys being selected when they shouldn't have been, almost always resulting in a failed match outcome, and an unknown number of customers following new provision routes when they should have been directed to a switching solution. CPs are encouraged to review their sales journeys to better guide customers to the right journey.

3.1.2 **Improved Data Quality Validation** (New Advice)

The quality of information provided by the customer themselves, when submitting their name, address, current provider (Brand) and other information has proven to be an area of concern and cause of Match failures. Some areas had been considered and the process design managed them, these included customers who had changed name but not updated their current provider, complex addresses (i.e. flats or apartments) and similar. CPs have provided evidence that even when presented with basic on-line order templates customers can, and do, enter inaccurate and misleading information, which understandably results in Match failures. This coupled with genuine and more understandable transposition of complex entries such as Account Numbers has contributed to Matching failures.

More evidence was presented to OTA2 regarding the quality of customer provided data, specifically surname (second name) and account number. It was evident that customers frequently input their full name (first and surname) when only the surname was requested. Account number was considered by some responding CPs to be a strong matching element; however, this was also identified as an area in which the customer appeared prone to error, with entries of mobile phone numbers, bank account details and, on one occasion, a password. Transposition of account characters and inclusion of spaces was also identified – though this was perhaps more understandable with account numbers exceeding 10 characters. It should be noted that investigation into some of these account number errors revealed that if the account had not been included then the match request would have succeeded, using the other data items.

Some of the basic reasons for Match Failures that have been identified to OTA2 could have been mitigated through the application of basic validation of customer submitted data before attempting to Match. Some examples are described below, but this is not an exhaustive list:

- Checking for ‘numeric’ in field that could reasonably be expected to only contain ‘alpha’ characters, identifying ‘spaces’ in surname/last name field to prompt a customer to correct John Smith to Smith or confirm Lloyd Smith if a double-barrelled surname, and similar patterns that could indicate an erroneous entry.
- Additionally, provide better guidance on expected entries for each field, e.g. prompting customer to enter surname/last name, as it appears on their existing provider’s bill, clarity on what ’Account Number’ means (i.e. not their bank account, but the account number with their existing broadband and/or voice service provider) and so on.
- Mobile phone numbers as NBICS identifiers could be flagged if the supplied number started with ‘07’ (it is noted that there are a small number of ‘personal’ non-mobile numbers starting ‘07’ – so the customer might be prompted to confirm that such a number is for their ‘landline service’).

CPs are encouraged to review their sales journeys to better guide customers and validate their submitted data before attempting a match.

3.1.3 **Autofill** (New Advice)

There is an increasing use of the 'autofill' capability available to customers who frequently complete online orders and forms. There is growing circumstantial evidence that suggests customers are unknowingly using this capability to quickly populate the fields required for Matching, but this data being incorrect for that specific purpose (many fields will also form part of the Gaining CP basic order journey, where such information may well be correct and as required.

It is recommended that CPs check their online ordering journey, assess what impact 'Autofill' might be having and consider disabling/restricting this feature if there is a risk of incorrect data being populated in fields used for Matching.

3.2 **Sending Match Request Messages** (Gaining CP)

3.2.1 **Match Request Message Construction** (Existing Advice)

As part of the investigations with TOTSCo, a number of Match Request rejections (not Match failures, but a failure in the customer journey and counted as such) highlighted issues with both the Gaining CP message construction and Losing CP message validation.

Gaining CPs are sending Match Requests with 'optional' message elements indicated, but not provided (e.g. UPRN field included but no UPRN entry). The OTS Message Examples document shows that message elements should be excluded if no data relating to that element is provided.

CPs are encouraged to review their solutions against the "OTS Message Examples" document.

3.3 **Processing Match Request** (Losing CP)

3.3.1 **Match Request Message Validation** (Existing Advice)

As part of the investigations with TOTSCo, a number of Match Request rejections (not Match failures, but a failure in the customer journey and counted as such) highlighted issues with both the Gaining CP message construction and Losing CP message validation.

Losing CPs rejecting Gaining CP submitted Match Requests when encountering 'optional' message elements without data (i.e. UPRN field included but no UPRN entry) – the OTS Message Examples document shows that message elements should be excluded if no data relating to that element is provided.

However, should this scenario occur, the Losing CP should disregard the 'missing' optional element and treat it as if it was not supplied, not reject the message, as identified in Lessons Learnt.

3.4 **Matching Process** (Losing CP)

3.4.1 **Matching Logic** (Existing Advice)

Matching documentation and Best Practice advice is not being fully followed by many RCP solutions. The Matching Best Practice Guide (BPG) provides a strong baseline process, factoring in all the potential data entry points and the logical sequence of matching against each in turn. However, we saw examples where CPs had not implemented the Matching BGP as written. This has resulted in failed Match requests that should have been successful.

An example of this was when a UPRN had been provided and the Losing CP only used this to match an address, rather than following the logic of the Matching BPG which allows for a successful match when a UPRN is not matched but other 'strong points of contact' are. Other examples include CPs introducing 'single points of failure' such as customer name, when the Matching BPG allows these to be 'unmatched' but overcome by other matching 'strong points of contact'.

The Matching BPG deliberately set out to reduce Match Failure rates where possible, and the take-up of this is expected by all CPs.

3.4.2 **Quality of Address and Address Matching** (Existing Advice)

The need for accurate Customer service address was identified early in the OTS design process and all CPs were encouraged to undertake a review and data cleanse of the address data they hold. Although some CPs have done so, the quality of address information is variable, and we encourage CPs who have not already undertaken a review and cleansed data to do so. It was noted that not all Losing CP solutions fully followed the Matching BPG, especially when attempting to resolve addresses for Flats, Apartments and similar sub-premises.

We recommend that CPs re-assess their solutions against the Matching BPG.

3.5 **Match not achieved** (Losing CP)

3.5.1 **Match Failure Response Codes** (Existing Advice)

OTA2 have identified that Match Failure Response Codes sent do not always align with the process documentation, causing Gaining CPs to take the wrong action when trying to obtain a successful match in a subsequent match attempt.

Direct causes were cited when although the match request had identified a customer with the Losing CP, the customer's service was reported to be in an 'unswitchable' state, which equates to a Match Failure, e.g. ceased, in course of cease and beyond the PONR (Point of No Return), or in the process of being switched. These are genuine reasons for a Match Failure, but must only be used when the correct conditions are met (as described in the BPG)

Indirect causes occurred when there was a genuine match failure, but the use of an incorrect response code led to further match attempts made based on false information which, predicably, also failed. It was considered that the correct response code would have driven a different resolution process by the Gaining CP and a successful matching outcome for the customer.

We recommend that CPs evaluate the accuracy of their response codes.

3.6 **Match Failure processing** (Gaining CP)

3.6.1 **Interpretation of Match Failure Response codes** (Existing Advice)

As part of the OTA2 investigations it was observed that not all Gaining CPs were correctly interpreting the Match Failure response codes they had received, and this caused either repeated Match attempts, with repeated and avoidable failures, or an incorrect process to be followed.

The OTS Response Code documentation includes suggested actions for each of the response code messages that can be sent. CPs are advised to review their processes and guidance given related to response codes received.

3.6.2 **Changing Matching Data in Subsequent Attempts** (Existing Advice)

Several CPs have confirmed to OTA2 that their un-assisted journey did not compel a customer to change any value in the data originally used, this could result in repeated matching attempts and failures if a customer simply retried entries that had already resulted in a match failure. It should be noted that even CPs who did mandate a change of entry for any matching retry could not guarantee that new values were being submitted by the customer, only that they had overwritten the previous data (e.g. could have retyped the same entry).

It is our understanding that assisted journeys (i.e. via a CP agent) frequently reuse the same system solutions for capturing and submitting customer provided data, so it would be reasonable to assume that same issue of changing data in subsequent match requests will be present here also.

CPs should review their solutions and consider how best to prevent subsequent Match Requests with no data changes from being sent.

3.7 **General** (Gaining and Losing CPs)

3.7.1 **Provision and Use of Assist URLs** (Existing Advice)

Some customers find it difficult to provide the right account numbers and other Losing Provider account information to obtain a match. There is a Best Practice recommendation to provide and use Assist URLs which we believe are highly likely to improve Match Success rates if used properly.

We recommend that CPs provide good quality Assist URLs and use them to help customers find accurate data to enter into a Match Request

3.7.2 **CP-to-CP communication process and tool** (Existing Advice)

Not all CPs have signed-up to use the CP-to-CP communication tool and process and often do not have the right internal organisational structures and processes in place to deal with issues raised. Future OTS performance improvements, including matching, will be enabled through the CP-to-CP communication process.

We recommend that all CPs sign-up to use the CP-to-CP tool and put in place processes to support this capability.

3.7.3 **No-Responses & Unable to be Processed** (Existing Advice)

There were numerous examples of CPs not responding to messages at all. CPs should be monitoring their intake of messages and ensuring they are responded to in a timely manner.

Some CPs are sending messages to the Hub which cannot be processed.

The causes of any 'failure to respond' or 'unable to be processed' errors should be resolved as a priority. TOTSCo provides detailed message reporting which can help any CP detect these issues.

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