

Communications providers in scope of One
Touch Switch

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One Touch Switch – Expectations of industry following OTA2’s ‘OTS Matching Review’ report

In my [letter](#) of 18 September 2024, I asked the Office of the Telecommunications Adjudicator (OTA2) to coordinate and facilitate a programme of cross-industry analysis and technical improvements to ensure the OTS matching process is able to support all relevant customer switching journeys. The primary phase of the OTA2’s work has now been completed.

Although One Touch Switch (OTS) is now in place and has been used by more than 220,000 customers to switch their services, I remain concerned that the OTS process needs improvement end to end. I am therefore sharing the initial findings of the OTA2’s OTS Matching Review with you and setting Ofcom’s expectations of the actions that providers in scope of OTS need to take, as a matter of urgency, following this report.

As a reminder, there are a number of regulatory requirements which are relevant to communications providers’ efficient and effective implementation of One Touch Switch. General Condition (GCs) C7.18 requires regulated providers to maintain a single process, One Touch Switch, for relevant switching customers in accordance with the GCs and “any applicable industry processes as agreed by the relevant industry forum”. Further, the high-level switching requirement, GC C7.4, also requires that providers “maintain simple and efficient process” for switches, “cooperate in good faith and take all necessary steps within their control” to complete the switching process “in accordance with this Condition C7 and Condition B3 and any applicable industry agreed processes”; and “do not delay or abuse” the switching process. GC C1.8 also requires regulated providers to “ensure that conditions or procedures for contract termination do not act as disincentives for relevant customers against changing their communications provider”.

The OTA2 has identified in their report a number of areas where improvements can and should be made by communications providers to secure improved rates of matching success for customers. These recommendations include that CPs should:

1. Review their solutions to ensure they are fully compliant with the [OTS process](#), and appropriate [Best Practice](#);
2. Analyse their live matching performance, in both gaining and losing journeys, and collaborate with as many other communications providers as possible to identify root causes and resolve them; and
3. Consider improving their monitoring, reporting and diagnostic capability to improve their ability to identify root causes of failure and fix them.

I have asked the OTA2 to continue their work in coordinating and facilitating cross-industry improvements to matching success. I therefore expect communications providers to urgently prioritise further work to secure improvements to their use of OTS both as losing and gaining providers and to cooperate positively with the OTA2 and other communications providers (in

relation to matching improvements) to enable all customers to realise the full benefits of quicker, easier and more reliable switching.

Communication providers can and must do more to ensure that they are compliant with the GCs set out above, so that OTS can be used by all customers in a simple and easy way. Ofcom will therefore continue to monitor the implementation of OTS by individual providers closely, including through our enforcement programme, and will take further enforcement action if required.¹

Yours sincerely,

Cristina Luna-Esteban

¹ [Enforcement programme: Industry's failure to implement One Touch Switch by deadline of 3 April 2023](#)