Answers to questions on industry submissions – June 2020

Introduction:

We welcome the opportunity to respond to Ofcom's further questions on the Option Y solution received from the OTA on 19th May 2020. Boxed text below shows the original question with red font providing a short answer, where appropriate, with enhanced detail in the text below.

Option Y

Identification and verification

- How reliable do you expect the matching process to be in practice? Considering in particular:
    - **Identifying the customer**
        - What is the expected success rate of matching against the mandatory info (name, address, postcode, LP name, services)? **Above 96%**
        - How often do you envisage a customer will need to provide an account number or other information? **Less than 4%**

Our subject matter expert colleagues in the CPs[1] contributing to Group Y firmly believe that at least 96%[2] (and likely higher) of customers should achieve a simple match, without a need to quote an account number. We have a reasonable period of time in which to work through the detailed design and matching criteria, and every provider is both a losing and gaining provider – it is in our interests to make this process work. Additionally, the RSSH will be able to provide independent statistics on provider performance, which will provide the means to identify and drive continuous improvement.

Unlike working line takeover (where the incoming customer sometimes quotes an incorrect address), the target market for switching is households living in a residential address, typically with a single broadband service and possibly a voice service, most commonly with the same retailer (although the Option Y solution supports multiple retailers for different service types switching to one as a single customer experience). Typically at the point of considering switching, the customer's current services have been in place for 12 months or longer.

Each unique residential address recognised by a local authority will be allocated a UPRN. E.g. if an existing building is split into flats, each flat is assigned a new UPRN. So close to 100% of residential addresses throughout the UK should have a UPRN, especially as switching does not arise for someone moving into a brand new property as the first occupant. Internet users are familiar with picking their address on UK focussed e-commerce sites, even if they aren't aware that many of these use UPRN.

Some services may be recorded by the retailer as being at an address that does not have a UPRN, e.g. where the top floor of a large house is rented out, but is not a self-contained flat. We propose that the losing provider would be mandated to return a successful match against the UPRN of the

[1] The contributing subject matter experts come from a range of backgrounds, including large CPs, smaller and emerging operators and industry groups.

[2] We estimate each of the 4 factors (UPRN, customer name, retailer name and services) as having at least 99% matching for consumer customers. Overall this give a 96% success rate.

house - e.g. a UPRN for 17 Acacia Avenue should match a service recorded at "The flat", 17 Acacia Avenue which does not have its own UPRN.

Retailers will be mandated to support matching by UPRN, implying that they (or their aggregator) must have suitable commercial arrangements to use UPRN[3]. The search via RSSH will include all the address elements (needed for a quality audit trail) in addition to the UPRN, so a losing provider could identify a customer and service(s) without UPRN – but they need to use UPRN to act as a gaining provider.

We would expect that gaining providers will want to simplify the user (on-line) and agent experience of selecting the retailer – e.g. by deploying a dynamic search (like Google) where typing a few characters of the retailer name filters the list until there is only one.

Some existing retailers have multiple RIDs linked to single recognisable trading names. Other retailers have been formed via various amalgamations and acquisitions, and customers may use historic trading names. We propose that each retailer would be mandated to provide a "primary" RID but return successful matches if the customer's service is recorded against any other RID used by that retailer. Additionally, each retailer will be mandated to provide all of the trading names that might reasonably be quoted by any of their customers.

It is likely that the organisation operating the RSSH would act as a "clearing house" for this data, with a regular update schedule that gaining providers can consume on an automated basis – e.g. a weekly download of an updated data set.

Collectively, these mean that a customer with a reasonable knowledge of the trading name of their current retailer can make an easy, quick and accurate selection.

For customer name matching, we are proposing that the matching is on surname only – this is a balance between sufficient validation of the proposed switch and ease of use by typical customers. Additionally we propose that the match would be mandated to be a case insensitive match of alphabetic characters, e.g. so that "OSULLIVAN" matches with "O' Sullivan".

The most likely reasons for failure we expect are:

- Incorrect name – e.g. customer forgets that the losing provider has a former name or mis-spelt name, but can easily correct this.
- Losing provider has recorded an incorrect service location, or address details that they are unable to match to a UPRN.
- Incorrect retailer – but the measures outlined above mean that most customers should be able to pick their current retailer easily and accurately.

[3] We note that access to UPRN data is likely to become easier from July 2020 based on changes planned under the recently signed "Public Sector Geospatial Agreement".

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- How reliable do you expect the matching process to be in practice? Considering in particular:
    - **Identifying the services:**
        - Will the Hub present the GP with all the services the customer takes with the LP so they/the customer can select from a list of services actually taken? - **No**
        - Or does the customer/GP have to submit the correct services types without an indication of services provided by LP? – **Yes** If so how specific does the service description the customer provides need to be? – **Broadband, Voice or both**

The request via RSSH will quote the service(s) to be transferred, plus the service(s) to be terminated, and only at the level of "Broadband" or "Voice" initially. The response from the losing provider will provide technical detail to support the transfer order, e.g. infrastructure provider (e.g. Openreach), technology (e.g. FTTC or FTTP) and service identifier (e.g. an Openreach circuit reference).

A switch of a voice service with retention of the existing telephone number will require the customer to provide their existing telephone number. Customers will also have the option to transfer voice service without retention of number (similar to the STAC process for mobile switching) and to request cessation of the voice service (e.g. transferring to a broadband only proposition with the GP).

The losing provider is responsible for communicating rapidly the impacts of switching to their customer, .e.g. "switching broadband will terminate existing voice service or TV service", "voicemail messages will be lost".

Identification and verification

- What happens if the GP cannot get a full match even with further information from the customer (e.g. mistakes in LP records)? – **See below** Does the customer then have to contact the LP to get the correct details or get the LP to correct their systems and go back to the GP again? - **No**

Our proposed switching process is truly GP led and we envisage no scenarios where the customer will be **required** to contact the LP in order to facilitate this[4]. The GP should work with the customer to identify sufficient information that a reasonable LP can use to facilitate a full match. Where no match can be found, then industry processes will also be needed for escalation, similar to the "Contact Register" defined under the service establishment and maintenance processes for geographic number porting.

For a customer wishing to switch only a broadband service (and not switching voice, or willing to take voice with a new telephone number), as a last resort, the GP could instead use existing working

[4] Many queries will be resolved by checking a recent bill, e.g. to find the address or account number.

line / service takeover processes – these typically require only address identification. But this would be restricted to takeovers within the same infrastructure provider[5]. An audit trail of the failed searches would already exist on the RSSH.

In the worst case scenario (a tiny fraction of consumer customers, e.g. where the service address held by the LP is significantly wrong), Option Y is still no worse than the current switching process (e.g. cease and provide for cross-platform switches).

Expedite process

- How does the expedite process/code work?
    - E.g. Would the LP need to log an expedite code in / via the hub against every switch order? - **No** Or is it expected that the GP would message the LP via the hub with the expedite code and the LP verify it? - **Yes**
    - Is it expected that customers receive this code via email and can provide to the GP as part of the sales process? – **No** Or is it expected a customer will contact the GP again at a later date? – **Yes, allowing customers to consider impacts of switching**
    - How does this work for customers who receive the notification in hard copy? Is the assumption that they receive the letter too late to benefit from an expedite code?- **No**
    - Are you referring to the expedite process when you say the process can significantly reduce timescales for 'many customers' compared to 'current industry norms' (page 1)? And if so, would you expect this to be the default customer journey or an additional option for some customers. – **Provided to all customers who may elect to utilise**
- Can you confirm that the expedite process has not been assumed to be part of the process for cost estimates? – **No change required to cost estimates**
- What impact would you expect adding it would have on cost estimates? – **No change required to cost estimates**

As a group, we are committed to meeting the spirit of the EECC requirements for a timely switch, using an expedite process to bring forward the switch date. The only way for a customer to receive an expedite code is via comms from their LP, along with the mandatory impacts of switching statement, and this mitigates the risk of slamming. Both GP and LP will inform the customer of the expedite process and how to use it, GP at point of sale and LP as part of the transfer notification communications.

For intra-platform switches, the earliest switch date may have a very short lead time (most likely constrained by CPE delivery). For cross-platform, the lead time for the engineering work required by the GP's infrastructure provider is likely to be the constraint on delivery time.

Our proposed default journey is a 7 day lead time, for consumer protection reasons. The expedite process is intended for a customer who wishes to switch with minimum delay, and is willing to re-

[5] Note that same infrastructure provider will remain a material proportion – e.g. ~80% of broadband customers are today within the Openreach ecosystem.

contact their GP with the code, once they have received the comms from the LP – many GPs will offer an online self-service process for expedite.

It is proposed that RSSH would generate an expedite code at the point when the switch order is sent from the GP to LP(s) – generation at RSSH gives a consistent format (allowing standardised validation when the customer returns to their GP). The LP would be mandated to pass the expedite code to the customer via the fastest mechanism available, e.g. email or SMS as agreed by the customer – in addition to any letter that the LP sends in line with the General Conditions. If the customer has not maintained their contact details with their LP, and thus receive only a letter (but still in a timely fashion), they will still have an opportunity to expedite their switch in the remaining window.

The expedite process has been designed to add data to messages that are needed for the basic solution. For the majority of respondents, the additional data has no material impact on the cost estimates.

Potential modifications

- Various documents note some potential modifications to proposals:
  - **A** LP to include with 'Full Match' response to hub further info on customer's services (e.g.: type of BB (e.g. FTTC or FTTP); upstream infrastructure provider (e.g. Openreach or Virgin); and, their references (e.g. ALID or ONT reference) (page 3).

After further discussion, we are now proposing that the full match response from the LP **must** contain the reference information listed above. Without this information, a further matching process would be required with the infrastructure provider, with no knowledge of whether the proposed transfer was inter or intra, and attendant risk of erroneous asset matching, we do not want to replicate any process such as the current email based ALID checking process.

The extra information is additional data on message that are needed for the solution, and has no material impact on the cost estimates.

- **B** Hub query or 'full match' response from LP to hub also triggers LP to send switching info to customer. Customer could therefore have full switching info (and possibly expedite code) whilst still dealing with the GP and potentially before placing an order (presumably only if the LP has their email address). (Page 2 of Y on Y comments Annex (Dec 2019))

Under a truly GP led process, the customer places a transfer order with the GP, and only then can the LP send the impacts of switching to the customer, along with the expedite code. We are **not** proposing that any comms is sent by the LP at the point of matching, as the customer has not yet given their consent for the switch, and the customer may not want their LP to be aware that they are considering a switch.

- For each of the above:
  - Can you confirm that these have not been assumed to be part of the process for cost estimates? – **No change required to cost estimates**
  - What impact would you expect adding them would have on cost estimates? – **No change required to cost estimates**

Implementation timelines

- Is the proposed implementation timeline 12 months from statement (as suggested in some consultation responses) or 10 months from statement (as suggested in some of the process documentation)? Can the retail CP and hub related changes, including any necessary procurement, set up and testing related to the hub, be completed in that timeframe? **– see below**

The implementation timeline is an amalgamation of three key elements:

- Industry governance process
- Hub provision, including a competitive selection process
- Design, development, delivery & test of an integrated end to end solution between the hub provider and multiple Retailers and aggregators.

The completion of the planned Ofcom consultation may currently be considered the starting gun for these elements. However, to avoid extending the implementation timelines, we recommend Ofcom sanction the process of creating and agreeing the industry governance protocols this calendar year and ideally starting ahead of the planned consultation in September. We would request that Ofcom engage OTA to facilitate this process, which would include representatives from both Option X and Y to focus on the commonalities ahead of the outcome of the consultation. It is a key requirement, regardless of the switching option selected, to resolve issues of future governance of the switching process and, with regards to the hub, matters of vendor / solution selection, ownership and management, including agreeing the process and structure of any RFI and subsequent tender processes.

The view from members of the Option Y team, previously involved in such matters, is that governance will take at least 6 months to finalise and hence the need to work in parallel with the consultation to avoid unnecessary extension of the timelines.

With regards the hub provision, the introduction of auto switching process using Syniverse took c.19 months[6] from consultation to implementation. This was against an existing process (PAC) for a smaller number of mobile operator and retailers than will be impacted by voice & broadband switching. While lessons will have been learned during this work that can be used to reduce the timelines, it is still considered challenging to deliver the hub in 12 months from completion of the consultation and hence finalisation of the option to be delivered.

[6] December 2017 to July 2019

The development work required by retailers and aggregators can be started in parallel with the hub delivery once a detailed design has been agreed with the chosen supplier and interfaces specified. This delivery will only move at the pace of the slowest link as the new process will have to be introduced in a big bang approach so as not to disadvantage CP's that are not as familiar with switching as the major network providers.

Based on further consideration and review, the team's view is that the lapsed end to end time for delivery is **18 months from completion of consultation** or **24 months from completion of consultation if we cannot commence work on the governance process from July 2020**.

The team behind Option Y, including a number of industry bodies representing many smaller players, have already completed initial reviews of the proposed solution as part of their response work so have broken ground on the steps needed for delivery and remain keen to proceed. This leaves the consortia members of Option X to bring up to speed and operators as yet unengaged with either option. As stated on our response, current order journeys remain largely unchanged in the supply chain and Openreach will not be required to interface with the hub, we believe this makes Option Y a simpler and quicker process to implement.

Porting

- We understand both processes contain elements that would support future changes to the porting processes. Which part of your cost estimates, if any, covering costs related to porting? – **see below**

The cost estimates do not contain any explicit provision for future changes to the number porting process. However, validation by a losing provider of a switch including full match of a supplied telephone number effectively provides a form of authority for customer retention of that number, including where the transfer would require a number port.

Conclusion:

COVID-19 has cemented the importance of communication for most households, making reliable, fast and economic internet connectivity as important as water, gas & electricity. New services and usages will further drive competition and aligned with the upcoming closure of the PSTN the frequency of consumers switching is likely to increase and therefore any changes delivered need to work to encourage rather than stifle competition. We believe our proposal acknowledges the challenges and provides solutions to overcome these to deliver a 21st Century solution fit for purpose.

We hope that the above information gives you the necessary information to evaluate the Option Y proposal. If further information is required please contact the team via the OTA and we would be delighted to support a call for further discussion

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This Option Y Gaining Provider led Voice and Broadband Switching response has been built with strong cooperation between the following industry members who commend it to Ofcom for consideration at their earliest convenience:

Air Broadband	Bridge Fibre	BT Group including Plusnet & EE
CityFibre	Federation of Communications Services (FCS)	Gigaclear
Hyperoptic	Independent Networks Co-operative Association (INCA)	Swish Fibre
TalkTalk	Vodafone	

Issue v1.0 on behalf of the Option Y Consortium by

[✂]

5th June 2020