

# Switching – where are we at?

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# Regulatory changes to switching

Part of Ofcom's  
EECC  
implementation

Came into  
force on 3rd  
April 2023

Covers NBICS  
(Voice) and IAS  
(Broadband)

Gaining  
Provider Led  
process  
required for all  
market sectors

Ofcom  
mandated One  
Touch Switch  
process for  
residential

Removal of  
Cancel Other  
and NoT+

Business left to  
their own  
devices but  
must be  
compliant!

# What's the status?

- **July 2022:** TOTSCo formed to implement a platform to support OTS
- **2022:** Gaining Provider Led Business Switching Group (GPLSB) formed to look at a process for switching business customers across networks
- **August to October 2023:** TOTSCo platform will be ready for testing
- Process and technical design completed for residential, draft process completed for business
- Tech Mahindra appointed as the chosen vendor for OTS
- **April 2023:** All residential providers technically in breach of general conditions, as are some business broadband providers.
- **April 2023:** Ofcom launched an industry wide enforcement programme for OTS non compliance



# Am I affected?

## I have a residential base with residential contracts

- You will have to consume the OTS process via TOTSCo for both NBICS and IAS
- Even if you have no intention of growing the base, you have to lose via OTS
- You will be expected to meet prescribed SLA targets – 60 seconds response time for a match, Implications of switching issued within 60 seconds



# Am I affected?

## I sell broadband products to the business market

- You will have to follow a GPL process if the customer requests it, or choose not to write the business. As a gaining provider you can choose which business to write in order to be compliant
- If you are on the Openreach network you could be partly compliant, with some contractual and operational changes
- You will have to lose customers via a GPL process.
- When any cross network processes, e.g. GPLB, are implemented you will either have to consume, or develop your own to meet the above requirement.



# Am I affected?

## I sell voice only products to the business market

- You will have to follow a GPL process if the customer requests it, or choose not to write the business.
- General opinion is that the number portability process is GPL compliant and meets the regulatory requirement
- You will have to make some changes to your processes and contracts – e.g. termination requirements
- However, there may be some advantages to consuming a switching process.



# I use a wholesaler. Will they do this for me?

- Simple answer – no.
- Both OTS and the GPLB process facilitate communication between the gaining and losing CP only.
- The provisioning process does not change. OTS and GPLB are not provisioning engines.
- There is currently no facility for the supply chain to access the service to validate information such as switch reference numbers, or the directory functionality.



# What's happening for business switching

- GPLB has been running a number of process groups to define a business switching process, utilising the OTS design as a base model.
- The draft process has been issued for comment
- Anyone can utilise the design, it is not restricted to just a TOTSCo implementation.
- All GPLB Documentation available at <https://www.fcs.org.uk/gaining-provider-led-business-switching/>
- MOU signed with TOTSCo for them to develop the GPLB requirements but alternatives are also being considered



# What don't we know for business switching?

- Portal access - TOTSCo have opened conversations with a number of Third Party Integrators (TPI)
- No indication of implementation date, or if it will align with release of OTS
- No indication as to either onboarding or transactional costs. TOTSCo asking for prospective volume of users.
- "Pause" functionality still under discussion. This is required functionality for replacement of Cancel Other
- Business to residential and vice versa are still being discussed at the GPLB.

# What changes do I have to make?

Notice period initiated by the gaining provider action. Business CPs can still apply a notice period

Service termination should not have to be requested by the end customer to the losing CP for a switched service

Implications of switching mandatory for residential

Careful use of Cancel Other. It will be withdrawn on implementation of OTS

# Voice products and applications

- Ofcom had not considered the IP voice world when producing regulation
- Applications can't normally be switched when changing voice provider
- Applications might continue to function when the number based call functionality is removed.
- Voice only applications such as WLR replacement products should be cancelled on switch of the number.
- You may be asked to unlock handset equipment. But this doesn't consider transfer of licenses.
- Pre-contract summary and keeping the customer informed become increasingly important in specifying what can and can't be switched.



# Questions?

