

## **Ofcom-led One Touch Switch (OTS) Implementation Progress Steering Group (IPSG)**

### **Minutes of first meeting (29 November 2022 at Ofcom, Riverside House)**

**Members:** Representatives of 17 residential fixed voice and broadband providers.

**Also attending:** Claudio Pollack and Paul Bradbury representing The One Touch Switching Company (TOTSCo); David Halliday of the Office of Telecoms Adjudicator (OTA2); Cristina Luna-Esteban, Louise Marriage, Andrew Ward and Paul Reville representing Ofcom.

**Terms of reference:** Attached.

**Agenda and slides:** Attached.

### **Agreed actions:**

- AP1: Ofcom to circulate meeting minutes and slides.
- AP2: Ofcom to consider what clarification it can provide regarding GC obligations it considers are not dependent on implementation of One Touch Switch [See Ofcom's response in (8)(b) below].
- AP3: Ofcom to consider providing further clarification in relation to the obligation for CPs to retain records of sale and consent and whether this applies to prospective switches which did not go-ahead following discussions with the customer.
- AP4: TOTSCo to provide by the end of the year an indicative timetable including target date or range of dates for Phase 1&2 of OTS Hub implementation [See below].
- AP5: Members to discuss requirements for programme management of end-to-end testing of OTS process in Phase 3.
- AP6: Ofcom to consider what support it may be appropriate to provide to CPs in relation to the programme management and coordination of phase 3, subject to AP5 above.
- AP7: TOTSCo to consider labelling of published process documents and communication of document status as appropriate to registered prospective Hub users.
- AP8: TOTSCo to circulate test data and plans for use by CPs.

### **Note of meeting:**

#### **Introduction**

1. Ofcom reminded Members of the April 2023 deadline for implementation of the new switching General Conditions (GCs) and noted its concern that industry has not communicated a clear plan to meet these requirements.
2. Ofcom emphasised that CPs are responsible for OTS implementation and the IPSG is a forum for them to update Ofcom on progress and for Ofcom to provide updates on any questions on the wider GC changes. Ofcom is not holding TOTSCo to account, that is for CPs to do, as the body chosen by industry to deliver the relevant aspects of OTS.
3. Ofcom noted that scope of IPSG discussion includes all GCs due to come into effect in April, in relation to fixed providers, not only the requirement to implement and operate OTS.

4. Ofcom has asked the OTA to provide it with technical advice in relation to development of OTS by industry and to assist with industry liaison.
5. In response to queries from Members, Ofcom confirmed the following:
  - a) The IPSPG does not represent an entirely new approach to engagement with industry and similar discussions on policy issues took place with mobile providers on mobile switching.
  - b) Ofcom acknowledges some matters are not appropriate for group discussion and Ofcom is open to discussions with individual providers in such cases.

#### **April 2023 General Conditions summary**

6. Ofcom provided a brief presentation of the attached slides summarising the April 2023 GC changes for fixed voice and broadband services provided to residential customers.
7. Ofcom agreed to circulate these slides to CPs along with the minutes.
8. In response to queries from Members, Ofcom confirmed the following:
  - a) Ofcom will consider what clarification it can provide regarding GC obligations it considers are not dependent on implementation of One Touch Switch.

**Please note our following response:** The new switching rules as set out in our 3 February 2022 Statement<sup>1</sup> will come into force on 3 April 2023 (these changes followed our decisions in our 28 September 2021 Statement and preceding Consultation<sup>2</sup>). These rules include the high-level switching rules, One Touch Switch, Number Porting changes, and changes to the information requirements for mobile switching. The General Conditions in C7 apply in the context of switching (and number porting) and it is for CPs to satisfy themselves that they are compliant with all of these GCs, whether in relation to OTS or the other high-level switching rules.

- b) Ofcom will provide further clarification in relation to the obligation for CPs to retain records of sale and consent and whether this applies to prospective switches which did not go ahead following discussions with the customer.

**Please note our following response:** General Condition [C7.15](#) (version effective 3 April 2023) requires that records are kept, for a period of no less than twelve months, for **each contract entered into** with a Switching Customer who is a Consumer. This also applies per GC C7.16 to contracts cancelled or terminated within that minimum twelve-month period. It follows that this obligation does not apply to circumstances where no contract was entered into.

- c) Ofcom confirmed that individual retail customers can choose not to follow OTS but that CPs have an obligation to make this process available, whether they are losing or gaining providers and inform customers of the availability of OTS for switching retail providers.

**Please note our following additional comment:** As we said in paragraph [3.104](#) of our 3 February 2022 Statement, “we do not consider that a gaining provider would be complying with their obligations if they sought to provide new services to a customer without making use of the One Touch Switch process where it is applicable, nor would a losing provider be compliant if they sought to cancel a switching customer’s services without highlighting the

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<sup>1</sup> Ofcom, 2022. [Quick, easy and reliable switching](#), Statement.

<sup>2</sup> Ofcom, 2021. [Quick, easy and reliable switching](#), Statement and Consultation.

availability of One Touch Switch to them (see GC C7.18) and allowing them to use it if they wanted to.”

## TOTSCo Updates

TOTSCo provided a brief overview of its formation and progress:

9. TOTSCo is a company limited by guarantee where any user is eligible for membership (currently 8 members and 80 applications). It was incorporated in June, with CEO appointed in August. Membership includes the rights to attend general meetings and to vote for directors.
10. TOTSCo considers its role as:
  - a) Custodian of industry process; and
  - b) Responsible for commissioning a messaging Hub and onboarding prospective users.
11. TOTSCo’s objectives are to ensure OTS delivers a quick, efficient and reliable switching process and all CPs follow the same process.
12. TOTSCo was formed after a long period of consultation organised by the OTA which involved many members of industry and a detailed design group, which worked together to define the process. This process design is available on [TOTSCo’s website](#).
13. TOTSCo is currently planning for the implementation of a messaging Hub which it will run, and charge for use of. This will allow the exchange of messages between CPs, to identify customer and assets to be switch and to confirm when switching is complete and billing must cease. The Hub will also provide a number of error messages when problems are encountered.
14. TOTSCo is a ‘thin’ company – there are four employees on the payroll and a small number of contractors. The company is currently funded by loans from BT, Sky, Vodafone and VMO2.
15. TOTSCo emphasised that it will not deliver OTS — it is a custodian of the process and the Hub, but 90-95 percent of the work including systems development will need to be done by CPs themselves.
16. TOTSCo is encouraging affected CPs to register for updates on its [website](#). 400 individuals representing around 250 different organisations have registered so far.
17. TOTSCo website has been set up including information for CPs and Q&As. It has also published v4.1 of the industry process, and the API specification to define the interface for interacting with the TOTSCo Hub. The API spec is a late-stage draft which may be subject to some further refinement as needed.
18. These [published documents](#) are the ‘starting gun’ to trigger and enable CPs to start work on their own system changes including testing activity. In due course TOTSCo will deliver test harnesses and test cases, but this will not be necessary for CPs to make progress, and is essential in order to compress the timescales for final implementation, as Ofcom expects.
19. TOTSCo asked prospective suppliers to submit proposals for the build of the Hub and a set of services supporting its use including onboarding, billing and cash collections, and provision of testing services. Responses are expected over the next week.
20. TOTSCo noted that there are a few matters outstanding:

- a) TOTSCo is consulting with CPs on its expectation that an SLA for sending switching information by losing providers should be set at 60s where it is being sent electronically.
- b) TOTSCo is consulting with CPs to develop requirements for an alternative mechanism to access the Hub messaging functions for those CPs who are not in a position to develop for the API.
- c) TOTSCo is also discussing the extent to which the Hub may be used by CPs for business customers and to understand what modifications may be needed to make it appropriate for this use.

21. In relation to timing and phasing, TOTSCo have identified three key phases:

- a) Phase 1 – this includes all current activities up to final contract with a single Hub supplier.
- b) Phase 2 – this includes the Hub development and QA phase and ends with deployment of a tested Hub service into a test environment for end-to-end testing by CPs and in parallel the delivery of appropriate test harnesses and data.
- c) Phase 3 – all activities after delivery of the Hub and before launch of OTS including the end-to-end testing phase, and onboarding of users.

22. TOTSCo noted that further discussion is needed on what the criteria for go live of OTS will look like. TOTSCo emphasised that it is not itself in control of the timing of that phase, and any decisions must take into account the views of Ofcom and the progress of individual CPs with readiness for launch.

The following points were discussed in response to queries from Ofcom and Members:

- 23. Regarding the timetable for Hub delivery, TOTSCo expects to be able to give a target date or range of dates for Phase 1&2 by the end of the year. However, the timing of Phase 3 (and therefore the question of when industry will be in a position to go live with OTS) is not in TOTSCo's control.
- 24. Ofcom said it is likely to get the assistance of OTA in considering industry readiness for OTS launch. It will not be acceptable to move at the pace of the slowest CP. It is for industry to hold TOTSCo to account for making the OTS Hub and associated processes available to support a timely launch of OTS.
- 25. TOTSCo confirmed one of the formal assessment criteria for assessing RFP responses would be delivery as close as possible to 3 April 2023. This point was stressed to potential vendors in pre-RFP discussions.
- 26. Ofcom confirmed that the GCs require there to be one switching process for residential switching which is OTS and, therefore, CPs cannot comply with the switching obligations by following an alternative process to OTS.
- 27. TOTSCo encouraged CPs:
  - a) to start work on their own implementation now.
  - b) to engage with TOTSCo through the stakeholder forum.
  - c) to develop a relationship with the relevant [TOTSCo director](#).

28. TOTSCo confirmed that there is a mailbox for CPs to send TOTSCo questions directly ([enquiries@totsco.org.uk](mailto:enquiries@totsco.org.uk)) and answers will be published on the [FAQ page](#). TOTSCo asked CPs to let them know if any additional information is required in relation to the process documents it has published.
29. Members agreed there may be a need for programme management to coordinate CPs end-to-end testing of the OTS process after delivery of the OTS Hub, and it will pursue further discussion to progress programme management requirements outside IPSG.
  - a) Ofcom will consider what support it may be appropriate to provide to CPs in relation to the programme management and coordination, should CPs require this.
30. TOTSCo agreed to consider the labelling of published process documentation to ensure it is clear that CPs can rely on these documents to progress their own development, and to communicate this further as appropriate to registered prospective Hub users.
31. TOTSCo noted that all Hub messages are defined in v4.1 of the process design.
32. Ofcom concluded that this had been a valuable discussion and helpful for Ofcom to hear some of the topics raised which may provide agenda items for future IPSG meetings. Ofcom needs to be satisfied that CPs are making progress.

#### **Members updates / AOB**

Ofcom invited Members to provide any comments or queries regarding their own progress with implementation. The following points were confirmed in relation to Members queries:

33. Ofcom confirmed the next meeting is scheduled for 12 January 2023 and Ofcom will circulate an agenda in advance including further discussion on the implementation timetable and any questions raised by CPs.
34. TOTSCo confirmed it will be responsible for providing CPs with some test data and plans for end-to-end testing of the Hub.
35. Ofcom noted that it has selected Members for invitation to attend IPSG based on a combination of factors including the size of the market and the need to ensure a spread of different technologies.
36. TOTSCo confirmed it is consulting on a minimum viable product to give access to Hub API functions indirectly for those providers who may not wish to develop for API access themselves. Ofcom said that CPs must be ready to use OTS whether or not they intend to use any third-party managed solutions to achieve compliance.
37. TOTSCo confirmed it will provide an indicative timetable by the end of the year for Phases 1&2 of implementation.