

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

Minutes of second meeting (12 January 2023 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: Attached.

Agreed actions:

- AP 1: Members to discuss requirements for programme management of end-to-end testing of OTS process in Phase 3 [see paragraphs 1&2].
- AP 2: TOTSCo agreed to scope programme management role and to consider what it would need to progress this before reporting back to CPs [paragraph 2].
- AP 3: TOTSCo agreed to meet with JC [paragraph 3].
- AP 4: Ofcom agreed to forward AH's letter to attendees [paragraph 7, completed 13 January].
- AP 5: TOTSCo agreed to update Members on timelines as plans develop [paragraph 9(e)].
- AP 6: Ofcom to circulate meeting minutes and agenda [including for accuracy comments by CPs per paragraph 8].

Note of meeting:

End-to-end testing activity and programme management:

1. Members agreed there is a need for programme management/coordination of end-to-end and pre-launch activity/testing and that TOTSCo is likely best placed for this. Discussion highlighted that there are a number of different testing and planning activities that must be coordinated to mitigate the risks associated with launch of OTS and decommissioning existing processes and that this scope is much wider than testing the flow of messages between providers. It was also noted that many of the activities and processes that are needed as part of the OTS process will need to be implemented and tested by CPs themselves within their own systems and processes to ensure the full consumer journey works smoothly. [AP 1]
2. TOTSCo agreed to scope programme management role and to consider what it would need to progress this before reporting back to CPs but cannot commit to undertake the role until this analysis is done. [AP 1 & 2]
3. TOTSCo agreed to meet with Jeremy Chelot (JC) to discuss his proposed solution to enable CPs' pre-live testing [AP 3].
4. Ofcom said it was pleased that solutions for testing are being developed by CPs, given the need to deliver OTS as soon as possible, and it urged CPs not to wait until the Hub is ready

but to progress their own development and testing as much as they can now, since much of this work is not dependent on the Hub.

Anne Hoitink (AH) letter to Ofcom:

5. AH discussed the letter sent to Ofcom on behalf of listed CPs which set out signatories' view on which GC requirements can be implemented by 3 April 2023 independently of any OTS Hub or process being in place. Discussion highlighted that Members had understood that Ofcom would provide more detailed guidance on this topic from APs discussed at the first meeting which Ofcom did not provide.
6. Ofcom clarified that it is pleased that CPs are looking carefully at their obligations, but it is not planning to provide a line-by-line view as to which parts of the Condition rely on the delivery of the OTS process including the messaging Hub, as an integral part of the OTS solution designed by industry. It is for communications providers to satisfy themselves that they are compliant with all of the GCs and that they are taking every step necessary to implement OTS. If the deadline is not met and providers are not compliant with our rules when they come into effect, we will consider what action is appropriate. As Ofcom's Enforcement Guidelines¹ make clear, we will take an evidence-based and proportionate approach to enforcement, and any action will be targeted and appropriate, taking account of all the relevant circumstances.
7. Ofcom agreed to forward AH's letter to other attendees for their information, without comment or endorsement. [AP 4. This was done on 13 January.]
8. It was also agreed that meeting minutes would be shared with attendees in draft before being finalised, to help ensure a common understanding of action points and next steps. [AP 6]

TOTSCo update:

9. TOTSCo provided a brief update on recent activities:
 - a. Around 260 organisations have registered with TOTSCo for updates and 23 have been appointed members of TOTSCo.
 - b. TOTSCo has announced a series of clinics to be held during January and February to consider topics including API implementation and small CPs.
 - c. TOTSCo is planning to select a shortlist of 3 potential vendors to undertake workshops with a view to select a single vendor in February and sign a contract in March.
 - d. Based on RFP responses received, TOTSCo anticipates release of messaging Hub to QA environment for CPs at a date during the period from August to November 2023.
 - e. TOTSCo agreed to update Members further as its planning develops and more accurate dates are available. [AP 5]
10. Discussion highlighted concern from some Members that the timeline for Hub delivery will make it impossible to fully comply with new switching rules by the 3 April deadline and that

¹ Ofcom, 12 December 2022. [Enforcement guidelines for regulatory investigations.](#)

further discussions by CPs in a different forum may be helpful to look for ideas to bring forward the timeline.

11. Ofcom said it is important to clarify that GCs require a single process to be implemented, OTS, and that Ofcom understands industry appointed TOTSCo to develop the messaging Hub which is integral to the process.

Following the meeting, and given the nature of discussions, Ofcom has prepared a letter setting out its views to be circulated to industry. [See attached Ofcom letter.]

Members updates:

12. Ofcom said that it understands a large part of the OTS process has to be delivered by CPs themselves and it is looking for reassurance that CPs will be ready as soon as the Hub is available to test. It is not acceptable for CPs to wait until the Hub is ready before starting their own development and preparation.
13. Ofcom noted it was important for CPs to raise any obstacles to progressing their own development and it would be happy to meet with any CPs individually if helpful.
14. Ofcom clarified in response to a query regarding the time needed to send switching information by letter that the sending of switching information by losing provider is an essential part of the OTS process and obtaining informed consent, however it expected only a small number of customers to have opted to receive communications by mail. The relevant GC requires, among other things, losing providers to send switching information by the quickest communications method, unless the switching customer requests an alternative communications method [GC C7.27(a), version effective 3 April 2023].