

Ofcom text	INCA's interpretation
The General Conditions that will enter into force on 3 April 2023 require regulated providers to maintain a single process for switching residential customers using fixed services (General Condition C7.18).	<i>A CP will not be considered compliant if not using the specified single process.</i>
The requirement for there to be a single process for residential fixed switching of phone and broadband services is important to allow residential customers to switch easily between any providers regardless of the network or technology used.	<i>The emphasis here is on the reiteration of the "single process" and on allowing residential customers to switch between "any providers regardless of the network and technology used".</i>
TOTSCo is therefore the relevant industry forum referred to in General Condition C7.18 (with effect 3 April 2023).	<i>Clear and self-explanatory.</i>
This Condition requires Regulated Providers to ensure that they maintain a single process for Communications Provider Migrations of Fixed Communications Services for use by Fixed Switching Customers in accordance with the GCs and "any applicable industry processes as agreed by the relevant industry forum". This 'single process' is OTS, as submitted to Ofcom by industry during an extensive period of consultation, and it is imperative that all providers within scope of the OTS rules work with TOTSCo and ensure that they follow agreed detailed process rules including use of the messaging Hub that TOTSCo has been asked to deliver.	<i>Again, the single process is emphasized, but the critical component here is at the end where Ofcom states: "it is imperative that all providers within scope of the OTS rules work with TOTSCo and ensure that they follow agreed detailed process rules including use of the messaging Hub that TOTSCo has been asked to deliver." Ofcom mandates using the TOTSCo Hub and no other system or messaging hub. Important to note this does not mean that providers cannot use an intermediary to interact with the TOTSCo Hub. Also, important to understand that all switches must use TOTSCo Hub, including switching on the same network (e.g., Openreach or CityFibre).</i>
we would emphasise that we consider communications providers use of the TOTSCo messaging Hub as integral to compliance with the OTS rules.	<i>As per above, no CP is compliant with the GCs unless they use the TOTSCo Hub.</i>
we understand that the TOTSCo hub may not be in place by 3 April 2023 and that, accordingly, it may be the case that providers are unable to demonstrate compliance with some of their switching obligations under the General Conditions.	<i>This is the first time Ofcom publicly recognises that OTS will not be available on April 3rd. This is significant.</i>
Our expectation, is that providers will, separately and collectively take all possible steps to establish the OTS process (with all associated features referred to in the industry design of 'Option Y') as expeditiously as possible.	<i>Very importantly, here Ofcom says that what CPs have to do is work as expeditiously as possible to get the OTS process ready. That, as made very clear above, includes getting the TOTSCo Hub ready as quickly as possible.</i>

	<i>Using any other form of system or messaging hub would not be considered compliant with the GCs.</i>
In the event that providers are not in compliance with their switching obligations by 3 April 2023, we will consider whether any enforcement action is appropriate to ensure that outcome.	<i>Here Ofcom refers to the 'outcome' of CPs working to get the process ready, not to compliance with the GCs on April 3rd, as Ofcom has already stated that it knows this cannot happen. Ofcom is, therefore, saying that CPs that do not contribute towards getting the TOTSCo Hub ready and getting their internal processes and systems ready (as INCA has been stressing for a long time now) will be considered non-compliant and Ofcom may therefore take enforcement action.</i>