



# **Best Practice Guide**

## **Reseller Identification (RIDs)**

**19<sup>th</sup> May'16**



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## 1 Document History

Version	Date	Details
V1.5	15 <sup>th</sup> Sept '15	1 <sup>st</sup> Draft for Stakeholder comment
V1.6	6 <sup>th</sup> Jan'16	<p>Para 2.6 Wholesaler perspective – revised wording</p> <p>Para 5 – Appendices section added</p> <p>Para 5 – App. A CoCo Report Spec added</p> <p>Para 2.7 - Wholesaler/Aggregator Exception – added</p> <p>Para 3.1 – RID Allocation process - updated</p> <p>App B added– Recommended Practices - BAU &amp; Change Scenarios</p> <p>App C added - Separate Action Log created (App. C) to cover BPG Development activity</p> <p>App D added – CSIF ToRs</p>
V1.7	18 <sup>th</sup> Jan'16	Format corrections
V1.8	28 <sup>th</sup> Jan'16	<p>Para 3.1 – Removed NMS Guide Hot-link ref</p> <p>Para 3.1 – RID Applications timeline statement amended.</p> <p>Para 2.4 – Purpose of RID – some text added to cover ELTs</p> <p>Removed Development Actions Log – Use CSIF notes action table instead</p>
V2	19 <sup>th</sup> May'16	<p>Para 2.2 – Statement added that the Retailer CP must only use the RID which has been allocated to them by Ofcom</p> <p>Para 2.7 – Statement added about Aggregators being able to facilitate direct discussions with their Retailer &amp; possibly their End User, when necessary.</p>



## 2 Best Practice Guide

### 2.1 Purpose

This document provides a shared 'industry-wide' view of current best practice to be applied by all Stakeholders in the application, use & management of RIDs.

It is envisaged that the current practice will be subject to ongoing review (and improvement) by all Industry Stakeholders (inc. Ofcom) under the stewardship of the new 'Consumer Switching Industry Forum' (CSIF). – **Appendix C refers – CSIF ToRs**

### 2.2 What is a RID?

RIDs are an integral part of the NoT process as having unique RIDs allows for relevant transfer activity to be matched to individual retailer brands. In this way, they perform a key role in providing enhanced protection from the risks of miss-selling and slamming under the NoT process.

Any retailer who has a direct relationship with a consumer, will require a Retailer ID (RID) in order to:-

- i. submit a valid NoT-based switching order to their immediate upstream supply chain partner.(i.e. as a Gaining CP)
- ii. generate a valid cancel other order (i.e. as a Losing CP)

A RID will be considered valid if it matches any one of the RIDs included in the latest Ofcom-published RID list.

CPs should always ensure they use their own RID, as allocated to them by Ofcom.

### 2.3 RIDs – The History

RIDs were originally introduced for consumer protection purposes, and provided the following key benefits:

- I. Ensuring Ofcom had access to accurate and meaningful data for the purpose of assisting its monitoring and enforcement programme in tackling miss-selling, slamming & ELTs(erroneous landline transfers). Unique RIDs ensured that Ofcom was able to quickly target it's resources towards resellers responsible for such incidents.
- II. Empowering consumers by enabling them, with the help of their current Retailer, to quickly identify the gaining party which had attempted to take over their services where they are victims of attempted slams. Absent the correct RID being used, this typically resulted in a frustrating customer experience as their existing CP was unable to provide this information to their customer.



## 2.4 Ofcom Perspective

Queries have previously been raised about the need for definition around the legitimate use of RIDs, without which some CPs consider there to be a risk of potential miss-application of the process. .

Use of RIDs is subject to GC1.2, which states that a RID can only be used “solely for the purpose for which it was supplied”.

Ofcom is not in a position to list a closed number of purposes for which RIDs may be supplied as this will be defined by technical necessity and would vary from one CP to another.

In Ofcom's view, provision of RIDs may include (without being limited to) the following purposes:-

- i. Informing the end user of the identity of the CP that has placed a transfer order.
- ii. Allowing the Losing CP to identify the Gaining CP so that they are able to raise issues of concern/dispute directly with the Gaining CP. This is particularly important in the event of an ELT (Erroneous Landline Transfer) where both retailers do need to liaise directly in arranging for service to be restored in short order.
- iii. Providing accurate and reliable data to Ofcom for the purpose of assisting Ofcom's monitoring and enforcement capabilities in tackling complaints of miss-selling and slamming.

Ofcom does not consider that RIDs are in any circumstances provided for the purposes of allowing customer retention activity instigated by the Losing Provider, or any other marketing activity by a CP, on the basis of the information it receives as a direct result of the switching process. As repeatedly set out by Ofcom, this does not preclude other types of customer retention activities, e.g. offers made to customer who contact their existing provider for a better offer.

## 2.5 CP Retailer Perspective

CP Retailers recognise that under the RID process, it is incumbent on all retail CPs to obtain a valid RID so that they may submit valid 'Switch' order transactions to their upstream supply chain partner or direct Wholesaler

## 2.6 Wholesaler Perspective

CP Wholesalers (and any intermediate aggregators/resellers involved in a given Retailer's supply chain) recognise their obligation to ensure the following:-

- The RID supplied by the Retailing CP with either the initial Switch order (i.e. GCP) or a subsequent Cancel Other order (i.e. LCP), matches any one of the RIDs included in the latest Ofcom-published RID list.
- The RID supplied by the Retailing CP with either the initial Switch order (i.e. GCP) or a related Cancel Other order (i.e. LCP), is faithfully conveyed throughout the supply chain to the opposite retailer involved in the transaction.
- Where both the Gaining & Losing Retailers reside entirely within a wholesaler's footprint (sometimes referred to as intra-footprint 'NoT' switching), wholesalers must ensure that they are processing such migrations, in accordance with the GP-Led NoT process.
- Wholesalers must have the ability to provide retrospective transaction details to Ofcom in support of any investigations which may arise.
- In addition to complaint-specific investigations, Ofcom also monitor the overall level of consumer switching transactions (inc. any associated cancel other transactions) using data supplied to them on a routine monthly basis by all the major wholesalers. (referred to as the CoCo report Spec– Appendix A refers)

## 2.7 Wholesaler/Aggregator Exception

- There may be instances where an intermediate supplier in the supply chain (e.g. Aggregator) will be reluctant to pass their Retailers' RIDs on to their upstream Wholesaler for sound commercial reasons. In this situation, and only by exception, the Aggregator should notify Ofcom that they have such concerns & will undertake to establish the following alternative arrangements:-
  - The Aggregator will substitute their own RID with each NoT transaction in place of their retailer's RID.
  - The Aggregator will store transaction logs of relevant retailer RID activity to be made available to Ofcom as and when required in the event of any subsequent enforcement investigations.
  - The data will be made fully available to Ofcom for scrutiny.
  - The Aggregator must be available to assist other CPs on demand in helping to resolve any queries relating to Consumer Switching transactions which have gone badly. This may require the Aggregator to facilitate direct discussions with their Retailer & possibly the End User.
- The Aggregator should secure Ofcom's prior authorisation before implementing these alternative arrangements.



### 3 Current Process

#### 3.1 Request for New RID allocation

Currently, Ofcom requires Retailers (sometimes also referred to as Resellers) to request/obtain a discrete RID allocation for each Brand they own. The rationale being that Consumer complaints will generally make reference to the Retailer 'brand' who they were switching from or to, and any subsequent investigation may be hampered if the offending 'brand' cannot be readily identified.

RID applications can be made via Ofcom's new online 'Numbering Management System' (NMS)

Ofcom have produced a **'step by step' guide** for CPs to follow when requesting a **new RID allocation**:

[http://stakeholders.ofcom.org.uk/binaries/telecoms/numbering/Application\\_for\\_RIDs.pdf](http://stakeholders.ofcom.org.uk/binaries/telecoms/numbering/Application_for_RIDs.pdf)

This guide includes a direct 'hot link' to the **Ofcom NMS online 'log-in' facility**,

[https://nms.ofcom.org.uk/NMS\\_ofcom/WEB-INF/xsa\\_logon.aspx](https://nms.ofcom.org.uk/NMS_ofcom/WEB-INF/xsa_logon.aspx)

which provides another 'hot link' to a very comprehensive **NMS Guide**.

CP RID applications are typically processed within 1-2 days but may occasionally take up to 3 weeks to process.

#### 3.2 RID changes/updates

RID's are allocated to a CP for the life of that CP. If and when it comes to Ofcom's attention that a CP has been dissolved (e.g. by reference to Companies House), Ofcom will withdraw the code and quarantine it.

If it comes to light that another CP has been using the code (for whatever reason), but the code was not allocated to them in the first place then they will have to re-apply.

Ofcom publish their latest list of 'allocated' RID codes showing the following details for each code

1. CP Name
2. Brand Name
3. Contact Details (Address, Tel No)
4. Date/Time of last update
5. <http://www.ofcom.org.uk/static/numbering/index.htm#rid>



All CPs are obliged to ensure their own RID details (as indicated in the latest published RID list) are always correct/complete & up to date & when necessary, should proactively notify Ofcom that their published details are changing in some way (e.g. trading status, contact details, brand name change)

CPs can notify Ofcom either via NMS or by sending an e-mail to [numbering.applications@ofcom.org.uk](mailto:numbering.applications@ofcom.org.uk)

Ofcom publish the latest (updated) RID list on a weekly basis. This is generally done on Wednesday by 18:00.

### **3.3 Supply chain exception**

Where CP-A (as a wholesaler/reseller) extends a portal (or B2B) interface to their downstream Retailers, it will be acceptable for CP-A to arrange their trading interface such that when their Retailer logs on to generate an order, the CP-A system will automatically associate the specific Retailer's account with that Retailer's own RID, which will be held and maintained in CP-A's systems.

Clearly, the responsibility rests with CP-A to ensure they maintain an up to date record of RIDs to be associated with each of their Retailer accounts when processing such orders.

The ultimate responsibility for ensuring the correct RID is associated with a given 'NoT' switching order (or related cancel other order) rests with the 2 Retailers responsible for the order.

### **3.4 RID Best Practice Guide - BAU & Change Scenarios**

Appendix B refers

## **4 BPG Governance**

### **4.1 Consumer Switching Industry Forum – TORs**

Appendix C refers

## **5 Appendices**

### **5.1 App. A - CoCo Report Specification**

### **5.2 App. B - RID Best Practice Guide - BAU & Change Scenarios**

### **5.3 App. C - Consumer Switching Industry Forum – TORs**