Office of the Telecommunications Adjudicator

Switching and Working Line takeover

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Where suspected erroneous orders have been identified and validated by a customer

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This briefing is written specifically for fixed services in scope of Ofcom's General Conditions C7, which is for IAS (Internet Access Services – broadband) and NBICS (Number Based Interpersonal Communications Service – voice). It will focus on the Openreach Access Network and services provided over it, however the principles are equally applicable for all networks.

It considers 'Switching', 'Working Line Takeover' and 'Number Porting' and has been created following concerns raised by CPs (Communication Providers) regarding erroneous transfers after 'NoT+ Decommissioning' took place on 24 October 2024. The removal of the facility to 'Cancel Other' an 'intra-switch' has highlighted existing issues that although comparatively low in volume have the potential for significant impact on an end customer's service should the scheduled switch (aka 'asset transfer') go ahead. The associated normalisation of MLT (Minimum Lead Time) means that switches can complete more quickly (than the previous mandatory MLT of 10 working days) including on the day, which also brings new challenges to consider.

The information provided is based upon experiences reported by CPs and lessons learnt to date and identifies further steps that CPs should consider when placing orders or in instances where a suspected Erroneous switch/working line takeover is identified.

Included in this briefing is advice for all parties involved; the Gaining Provider, Losing Provider and both Supply Chains, highlighting their roles and responsibilities, steps they can take to mitigate against erroneous orders being raised and actions available when a suspected erroneous order has been identified to them.

*(Please see **Annex** for further information relating to Definitions, NoT+ Decommissioning, OTS, TOTSCo, GPLB Switching, etc)*

The role and responsibility of a Gaining CP when switching.

With the adoption of OTS and the decommissioning of NoT+ the role and responsibility of the Gaining CP has never been more critical, both to ensure a successful switch for their new customers, but also to prevent an erroneous switch from being initiated.

A large number of the investigated examples of erroneous switching can be attributed to the way orders are created with the Gaining CP. For this reason, it is essential that the Gaining CP undertakes to respond promptly and appropriately when alerted to a suspected erroneous switch.

Key responsibilities:

In all cases the Gaining CP must have the customer's consent to initiate a switch and be aware of the implications of switching on any service(s) that will be impacted by your order. If a customer (residential or business) has not given their consent to switch, **the Gaining CP must not use a switching process to provide service.**

Be certain the person requesting the switch is authorised to do so – this applies equally for residential and business customers, though can be more complex in business switching scenarios especially with larger companies. Residential switching is usually initiated by the 'bill payer' themselves, though could be requested by a friend or relative, with the bill payer's permission, or under a Lasting Power of Attorney (LPA) agreement. Businesses can be particularly complex when identifying who legitimately can authorise a switch, with examples of erroneous switching being attributed to one individual/section in a company being unaware of another's actions (e.g. branch manager trying to switch, unaware of a central contract for services held by head office, etc). Another example of complexity is with Housing Associations, who provide services for residential customers. These customers may not be aware they do not own services they are attempting to switch, furthermore this is often an issue involving 'Alarm services' that are common to a housing block provided over what appears to be a residential connection.

Help the customer select the correct order journey for their needs. Expecting a customer to understand the subtle difference between a 'Switch' and a 'Working Line Takeover' (home-mover) without giving them clear guidance, can lead to customers selecting the wrong journey for their order, which will increase the risk of raising an erroneous switch.

Following the OTS process when switching a residential customer is a mandatory requirement under GC C7.

Key responsibilities. (cont.)

Matching of customers, through the OTS process identifies the correct customer, location and services to be switched. The information returned in a successful Match response will also include the Access Network provider ID and, for Openreach delivered services, an ALID (Access Line ID) or similar unique identifier to assist in placing an order against the correct service installation. It is important to use the information provided through the matching process to correctly verify the accuracy of any planned migration orders before they are submitted, e.g.:

- If the current Access Network provider was identified as not being Openreach, then a Gaining CP should never target a working service for switching on the Openreach network,

- If the ALID returned in an OTS Match result doesn't align with the one displayed against the address details in Openreach's systems, this should be considered a red flag for placing an order against that service.

Use the tools provided by the Access Network provider – Openreach offer a suite of 'dialogue services' that, amongst other features, allow a contracted CP to Match Addresses and view network connections to a specific location. Whether following the OTS process for residential customers or a business switching process for business customers it is advisable to use these 'dialogue services' to confirm that an order is being raised against the correct location and, if applicable, existing service connection. Selecting an address that 'isn't quite right, but close enough', can result in placing an order against the wrong location, triggering an erroneous switch.

These all contribute to the final, but the most important, principle which is - '**If in doubt don't'**.

If a customer did not expressly consent to have a switch managed on their behalf, or there is any indication that the address, service, or network aren't exactly correct, then a Gaining CP should undertake additional activities with their supply chain and customer to verify all details before committing to a switching order.

The role and responsibility of a Losing CP

A Losing Communications Provider (Losing CP) could be a losing provider in the sense of GC C7 or an unrelated third party that is subject to an erroneous switch order.

If using the Openreach network, directly or via a supply chain, the Losing CP should always receive an 'Unsolicited Cease' notification following the usual KCI1, 2 and 3 stages of an order. Included in these notifications will be the 'Cessation Reason', the target date for cessation, and the GRID* (Gaining Retailer ID), which uniquely identifies the Gaining Retail CP.

*Exceptions to this are when the Unsolicited Cease was triggered by a stand-alone number export request or if the service being ceased is not the dominant product (i.e. SMPF or FTTC when the dominant service is WLR or MPF).

- In the case of stand-alone number exports, 'Cancel Other' is still available to the Losing CP if the customer has validated that the switch is in error – see '***Service Ceased by Number Export'*** below.

- For SMPF and FTTC the WLR and MPF 'owning' CP has precedence and it is they who should lead the challenge.

Cessation reasons can be found in Openreach B2B documentation, however there are 3 specific ones of particular interest, these are:

For a home-mover scenario the cessation reasons will be either a '***Working line takeover'*** or '***Working line takeover with change of CP'*** both of which indicate there is a WLTO (Working Line Takeover) in progress and that 'Cancel Other' is still available (there is also a 10 working day MLT, if no open cease order already exists), and;

'***Service Ceased by Number Export'***, (associated to WLR only) indicates a stand-alone Number Export order has been placed against the number of the WLR service, and again 'Cancel Other' is still available in this scenario.

Keep your customer informed; using their agreed communication channel, inform the end customer of the upcoming cease of their service(s), the date, the reason for cease (explained in customer friendly terms rather than industry jargon) and any additional impacts of the cease, plus the options the customer may have if they do not believe their service should be ceased. Some of this may already have taken place as part of OTS or alternative process (e.g. sending of Switch Implications in OTS, triggered by receipt of a NPOR in Number Porting, or through the GPLB Switching

solution, etc) however this may be the first indication that the customer's service is scheduled to be transferred or taken over by another provider.

It is always advisable to check against your own records (did you issue an OTS SOR, is there a number export, has your customer contacted you about moving out of their current address, etc) to confirm if the 'unsolicited cease' is expected (as part of a process you have already been involved with), this includes where the cease has been requested by the customer (aka 'solicited cease').

If there is an issue, what could the Losing CP do?

Do not expect the customer to be able to fix things. You, as their contracted Service Provider, have a responsibility to assist and investigate when the customer has contacted you and reported that they did not request their service to be switched/ceased.

Check the scenario triggering the cease of the customer's service. If it is stand-alone Number Export or a WLTO (home-mover) then Cancel Other is still available and can be used to stop the order. But always confirm with the customer to ensure they're not actually switching or part of a home-move or, for businesses, a take-over. For example:
- A particular issue with businesses is when switches/takeovers have been initiated by one part of a company, but not communicated to other departments, who are now concerned that an error has been made – this can be challenging to confirm but is worth ruling out.
- Number Exports can take place when the end customer is moving home, taking their number with them and buying service from a new provider, or converting between a business and residential contract (with a change of Provider), so would not need to follow the OTS process.
- Residential customers may be legitimately switched by a relative (e.g. acting on their behalf or under LPA) but have forgotten this was being done.

CPs are reminded that the use of Cancel Other is restricted to when it is requested by the customer (or their representative), it cannot be used by a CP independently for other reasons (e.g. Debt or a billing dispute).

Use of GRID, specifically when dealing with suspected erroneous switches, has benefits. Initially it can be checked with the customer, who when informed of the Gaining CPs name may recall placing an order, or else it will assist the Losing CP with resolving the issue directly with the Gaining CP.

OTA2 and Industry are in the process of established a contact registry and supporting process documentation to facilitate contacts between gaining and losing parties.

If you are not a direct Openreach customer, or use a different network provider, then your supply chain should be able to assist with identifying who raised the order in question, providing a suitable reference and, if required, a contact point (see '**The role and responsibility of the Supply Chain'**).

Collaboration to resolve issues and prevent re-occurrence.

Collaboration between Losing and Gaining CPs to understand and address any erroneous orders is a bilateral process with benefits to both parties; the Losing CP is working to prevent their customer from being erroneously switched, and the Gaining CP to prevent provision of service at the wrong location and failing to deliver service to their new customer, alongside the financial and reputational costs that might be incurred, and avoiding breaching regulatory obligations.

One of the objectives of collaborating between both parties is to understand the root cause of the erroneous switch, this will support both Gaining and Losing CPs in addressing these in the future. For example:

- Correcting inaccuracies in the recorded address location of the service. E.g. historically the service was ordered against a real address, but is provisioned in a communal/shared area/comms room/etc. The Losing CP must take steps to correct this with their supplier, ensuring the correct 'location' is included the address and becomes clear to any future Gaining CP (Openreach operate their ORDI process for just such instances).

- improved address matching journey by the Gaining CP, assisting customers with selecting the correct address or offering further support in complex scenarios. Also, the Gaining CP should approach 'switch' orders with due caution when an address or identifier cannot be reasonably and accurately confirmed, follow the **'if in doubt, don't'** principle to avoid risking an erroneous switch situation.

The role and responsibility of the Supply Chain
It is acknowledged that the supply chain (e.g. resellers, wholesalers and network providers) may have no direct relationship with the end customer and can be several steps removed from the final retailer, who is holding the customer contract, however the supply chain still have responsibilities and will play an important role in resolving suspected erroneous switches, these include:

- Ensuring timely messages and updates are sent to their channel partners, which, for the scenarios this document covers, will be the 'unsolicited cease' (aka 'managed cease') notifications and any amendments/cancellations to those messages. With the reduction in MLT, the need for prompt and timely message sending is critical (i.e. 'batching' up messages and sending at the end of the day may result in notifications arrived too late to be actioned by the Losing CP)

- Providing their channel partners with additional information (either in the 'unsolicited cease' or upon request) including the identity of the Gaining CP or Retailer (if captured) and sufficient information to allow a Losing CP to be able to identify the order raised by the Gaining CP that triggered the 'unsolicited cease', so that the two parties can work effectively together. (i.e. the order reference).

- Establishing contacts with their channel partners which can be utilised when erroneous switches are reported and be prepared to co-operate directly with retailers (following suitable validation) who may not be a contracted channel partner.

- Developing additional support and intervention options, such as delaying suspected erroneous switches (amending delivery dates) to provide more time for all parties to resolve the issue. This will be of particular importance in scenarios where the service has been identified as CNI (Critical National Infrastructure – aka 'Blue Light') or is essential for Telecare type services (e.g. Health Pendants, etc – for more general information please see OTA2 BPG for Switching where Telecare is present).

- Supporting processes that allow DI (Data Integrity) issues and address corrections to be made by CPs who have identified these as contributing factors in an erroneous switch/WLTO scenario, so that future repeats of this situation can be effectively mitigated against.

Annexes:

A) Definitions

'Switching' is where the same end customer is staying at the same address but is changing their contracted service provider. Typically, the customer 'switching' their broadband and voice service from Provider A to Provider B.
There are two basic sub-types of switching scenario; 'intra switching' where the access network provider (e.g. Openreach) remains the same and 'inter switching' where the access network is changing (e.g. from Openreach to CityFibre).

'**Working Line Takeover'** (WLTO) describes the process where there is a different end customer at the same address with/without a change of service provider. Typically, a residential home mover scenario where a customer is moving house and places an order for broadband and voice service at their new address so that the services will go live on the date they move in.
For businesses, this can include scenarios where there is a change of contracting entity (e.g. Company A has taken over Company B and is also taking over some, or all, of the existing broadband and voice services).
WLTO, where available, has a 10-working day minimum lead time and the facility for the Losing CP to 'Cancel Other' on behalf of their end customer, if that customer informs the Losing CP that they are not moving. (See General Condition C7 for more).

'**Number Porting'** is a process by which the customer's number (for their fixed voice service - NBICS) is switched (technically having the porting prefix changed) between Service Providers as part of a 'switch'. It must be noted that like 'switching' the Number Porting process as specified in Ofcom's General Conditions B3 and C7, Number Porting is for scenarios where the end customer is changing their service provider (i.e. the entity they have contracted with to provide a voice service), it does not include scenarios where the end customer-service provider remains the same, but a change in voice service provider is being sought - this is not a switch and is not included in this briefing. Number Porting has the facility for an end customer to request the Losing CP cancel an NPOR (Number Port Order) if they have not authorised the porting of their number(s).

B) OTS (One Touch Switching)

OTS was conceived and designed by Industry (represented by many CPs, who contributed to the design process) and was chosen by Ofcom as the mandatory switching process for residential IAS and NBICS. To facilitate this process Industry created TOTSCo (The One Touch Switching Company), which designed, delivered and runs the messaging Hub, allowing RCPs (Retail Communication Providers) to pass the messages between each other that support the OTS process.

C) TOTSCo

TOTSCo are custodians of the OTS process, but they do not manage individual switches, this is (as per the requirements in General Condition C7) led by the Gaining CP, who will use the OTS process and their own supply chain to fulfil switch requests from residential end customers. In this role, the TOTSCo Hub is, by design and Industry stipulation, a simple message handling solution with no insight into any detail of individual switching events.

D) NoT+ Decommissioning

NoT+ (Enhanced Notification of Transfer) was the process that preceded OTS for switching NBICS and IAS in the Openreach and KCOM networks, mandated by Ofcom General Conditions that came into force in 2015. Additionally, a small number of wholesalers and other network providers also adopted the NoT+ process to support their CP customers when switching end customers between providers. In all cases NoT+ only supported 'intra switching' within the same access network or 'intra switching' within a wholesaler's environment.

The delivery of OTS meant that NoT+ was no longer mandated by the revised GC (General Condition) and that some elements of the process had no support in Ofcom's GCs. Specifically, these were the MLT (Minimum Lead Time) of 10 working days and the option for a Losing CP to, at a customer's request, use 'Cancel Other' to halt a switch. Further to this Ofcom issued a Letter to industry - One Touch Switch Implementation - Principles and Cancel Other which led to the decommissioning of NoT+ across all of the Access Network providers and Wholesalers who had operated it. It should be noted that the decommissioning was made at a generic level, as the parties operating it had no knowledge of the contract type held between the end customer and their supplier (who may be at the end of a complex supply chain).

Decommissioning of NoT+ removed the option for a Losing CP to 'Cancel Other' and allowed MLTs to default to the product MLT as appropriate to each scenario (see **Links** for Openreach examples)

E) GPLB Switching

GPLB Switching (Gaining Provider Led Business Switching) is a process conceived and created by CPs from all spectrums of the UK fixed communications industry. Unlike OTS there is no direct mandate from Ofcom about industry using a specific switching process, however the provisions in GC C7 for the process to be Gaining Provider Led are applicable, alongside other requirements on both Gaining and Losing CPs. More information related to the GPLB Switching process and the group involved in its creation and adoption can be found here.

Links:

Ofcom General Conditions - General Conditions of Entitlement - Ofcom

Ofcom letter to Industry - Letter to industry - One Touch Switch Implementation - Principles and Cancel Other

Openreach revised Minimum Lead times (uncontrolled) - MLT information

GPLB (Gaining Provider Led Business) Switching information - Gaining Provider Led Business Switching

Advice for CPs using Openreach services - Avoiding erroneous transfers and recovery options guidance

Best Practice guide for Telecare – OTA2 BPG Switching where Telecare is present