Gaining Provider Led Switching

April 2024

The information contained in this guidance is for your information only and is not intended to be relied on. It does not constitute legal professional advice, nor is it a substitute for you obtaining your own legal professional advice. Magrathea accepts no liability whatsoever for any errors, omissions or statements in this guidance or for any loss which may arise from your use of this guidance.

Contents

The background
Key terminology
How the rules apply to you
Additional rules to be aware of
Residential Users
- First steps
- The One Touch Switching Company
- Managed Access Providers
- Process Overview - Residential (High Level)

Number Portability (Express Porting)
- Process Overview (High Level)

Business Users
- First Steps
- The OTA Led working group
- Process Overview - Business (High Level)

Process Diagrams

magrathea

The background

In February 2022 Ofcom released a statement – Quick, easy and reliable switching – which introduced changes to the General Conditions.

> *"People should be able to switch telecoms provider easily, to take advantage of the range of services available. Easier switching allows people to shop around with confidence to find the best price and service for their needs. Difficulties in the switching process can put people off moving providers. Effective switching is also important to support competitive investment in, and take-up of, faster and more reliable broadband."*

From 12th September 2024* the GCs require all residential switches to be done via the 'One Touch Switch' process and all business switches must be gaining provider led already (but the process is not specified).

***This is a revised date due to the original being missed!**

The regulations

The UK decided to fully implement into domestic law the EU Directive, European Electronic Communications Code. Article 106 sets out how a simple switching and porting process should work.

Simpler switching also remains a strategic priority for Ofcom, as set out in their annual plan of work.

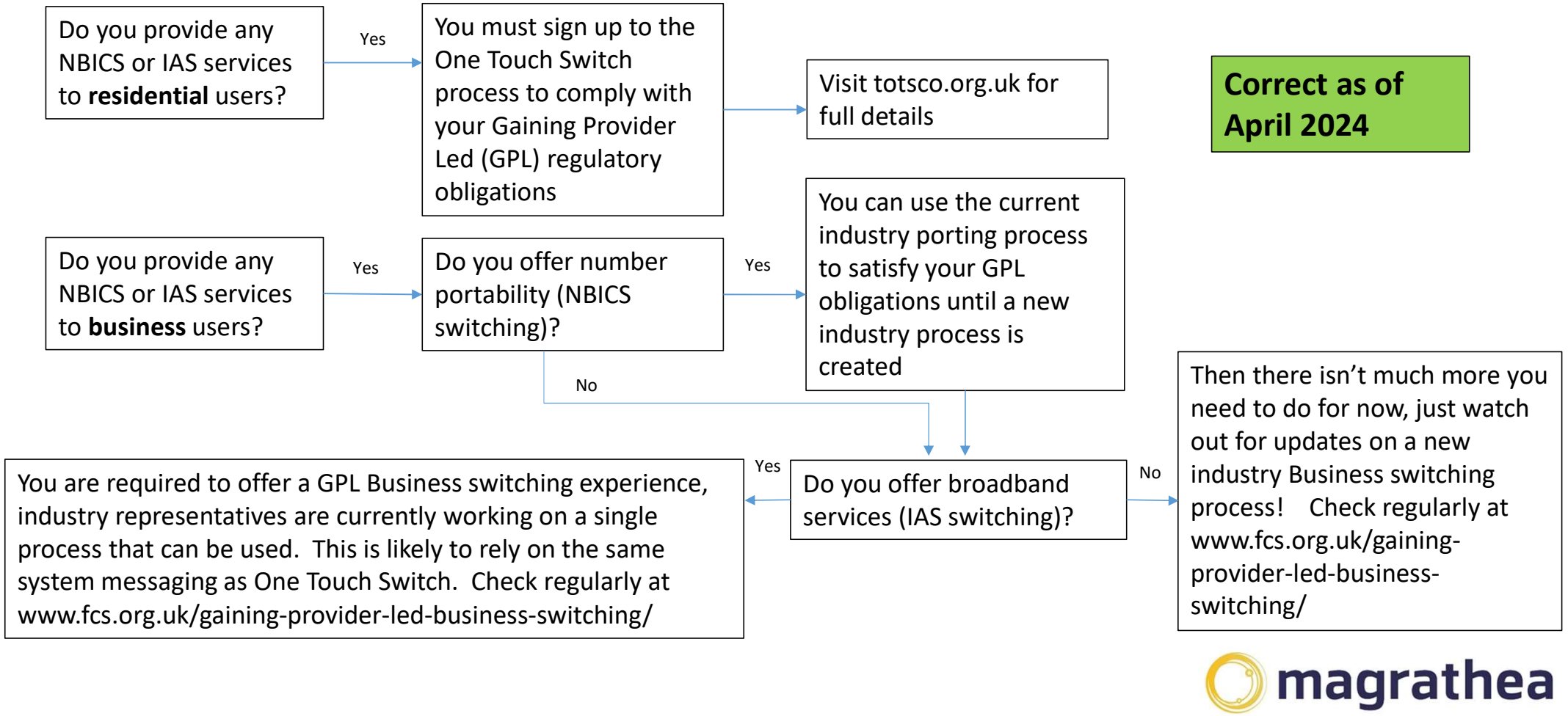
magrathea

Key terminology

Switching	A customer changing their provider at a fixed location
Porting	A customer keeps their phone number when changing provider
OTS	One Touch Switching
TOTSCO	The One Touch Switching Company
IAS	Internet Access Service
NBICS	Number-Based Interpersonal Communication Services
GPL	Gaining Provider Led
GCP/GRCP	Gaining Communication Provider/Gaining Retail Communication Provider
LCP/LRCP	Losing Communication Provider/Losing Retail Communication Provider
SPX	Switch Port Execute (new porting type “express porting”)
SPQ	Switch Port Query (new porting type “query port details”)
SOR	Switch Order Reference (unique identifier attached by TOTSCo Hub)

magrathea

How the rules apply to you



Correct as of April 2024

magrathea

Additional rules to be aware of

The new GPL switching requirements are only part of the new rules that came in on 3rd April 2023

These are brief headlines, for full details please check the Magrathea guidance or Ofcom's General Conditions

- ❑ Right to port: You must allow your customers to export a number up to 30 days after their service has ceased.
- ❑ Porting fees: You must not make any direct charge to your customer for porting a number as this may be seen as a barrier to porting.
- ❑ No disruption: You must carry out a port or switch with no loss of service where technically feasible, any break in service must not exceed one day.
- ❑ Compensation: Compensation must be paid to switching customers when a provider has failed to comply with regulatory obligations or has missed an appointment (residential customers must be paid within 30 days).
- ❑ Splitting blocks: Splitting number blocks for portability must be allowed where technically possible.

magrathea

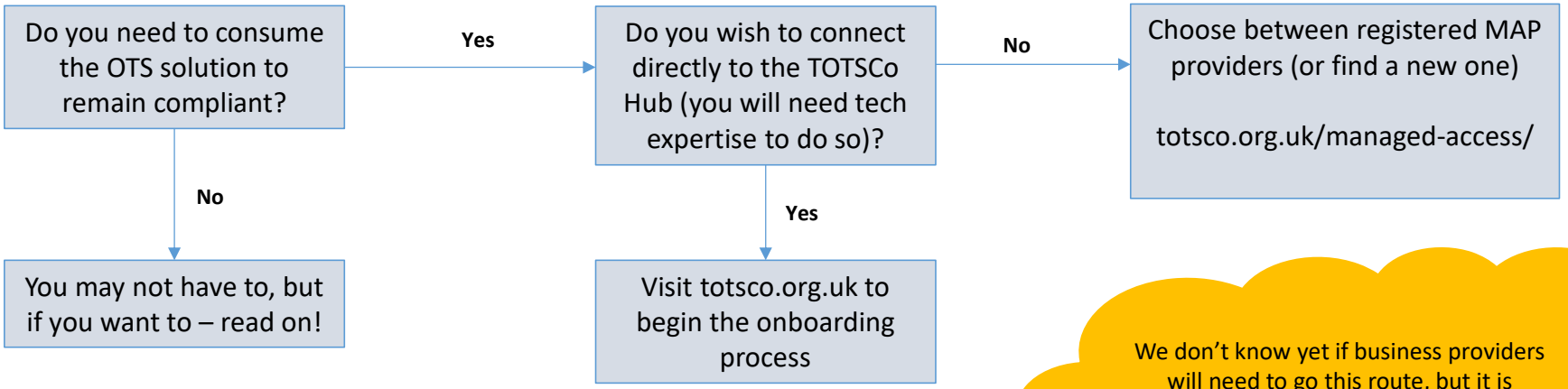
Residential Users

One Touch Switching

Note: To determine if a service is business or residential you would normally rely on the contract in place, rather than the service use case.

First steps (OTS)

If you do need to consume OTS you will need to get onboarded with TOTSCo, you can do this now!



We don't know yet if business providers will need to go this route, but it is looking like a strong possibility to avoid providers of both types of service from having two different solutions

magrathea

The One Touch Switching Company (TOTSCo)

TOTSCo was established in June 2022 to develop and operate a messaging platform that would deliver the OTS solution mandated by Ofcom. It is a not-for-profit organisation owned by members. It has been financed with loans from industry participants. Costs are to be recovered via fees paid by users of the service.

The board comprises of nine directors. Six have been appointed from industry to reflect the variety of stakeholders, including Infrastructure, Business and Retail. The technical solution – the "**TOTSCo Hub**" has been developed by Tech Mahindra.

IMPORTANT NOTE: The TOTSCo Hub is essentially a mailbox to facilitate the quick and simple exchange of messages between providers. It does not carry out any other part of the process to enable a switch or port to take place.

Onboarding

Any potential user of the TOTSCo solution will need to be onboarded. Users must state if they will use the service directly or via a Managed Access Provider (see next page). Once registered you will be issued with an RCPID (Retail Communication Provider ID), you may apply for more so that you have one for each brand (if applicable). Note that each RCPID will need to go through their own testing process.

Next you will need to register how you will pay for the service, who your Access Network Provider is (see next page) and how many customers you have – this is used for billing. Finally, you will need to sign a user agreement and then you can proceed with testing.

For full details visit the website https://totsco.org.uk

magrathea

The One Touch Switching Company (TOTSCo)

Managed Access Provider (MAP)
It was recognised early in the process that many retail providers will have neither the skill or the resource to engage directly with TOTSCo and consume the OTS process. As a result, a number of MAPs have created tools that enable simpler integration with the process.

Some MAPs offer a choice of solutions:

Insourced:	The retailer hosts the platform in their own environment, utilises the tool but pays TOTSCo directly for the hub usage.
Technical:	The MAP hosts the platform and provides the retailer with an interface. The retailer pays TOTSCo directly for hub usage.
Full Management:	The MAP deals with everything for the retailer, billing them for any TOTSCo charges too.

Access Network Provider (ACP)
TOTSCo want to know which network supports your services. For example, if Retailer A resells Community Fibre broadband and Retailer B resells Virgin, Retailer A would list Community Fibre as their ACP and Retailer B would list Virgin.

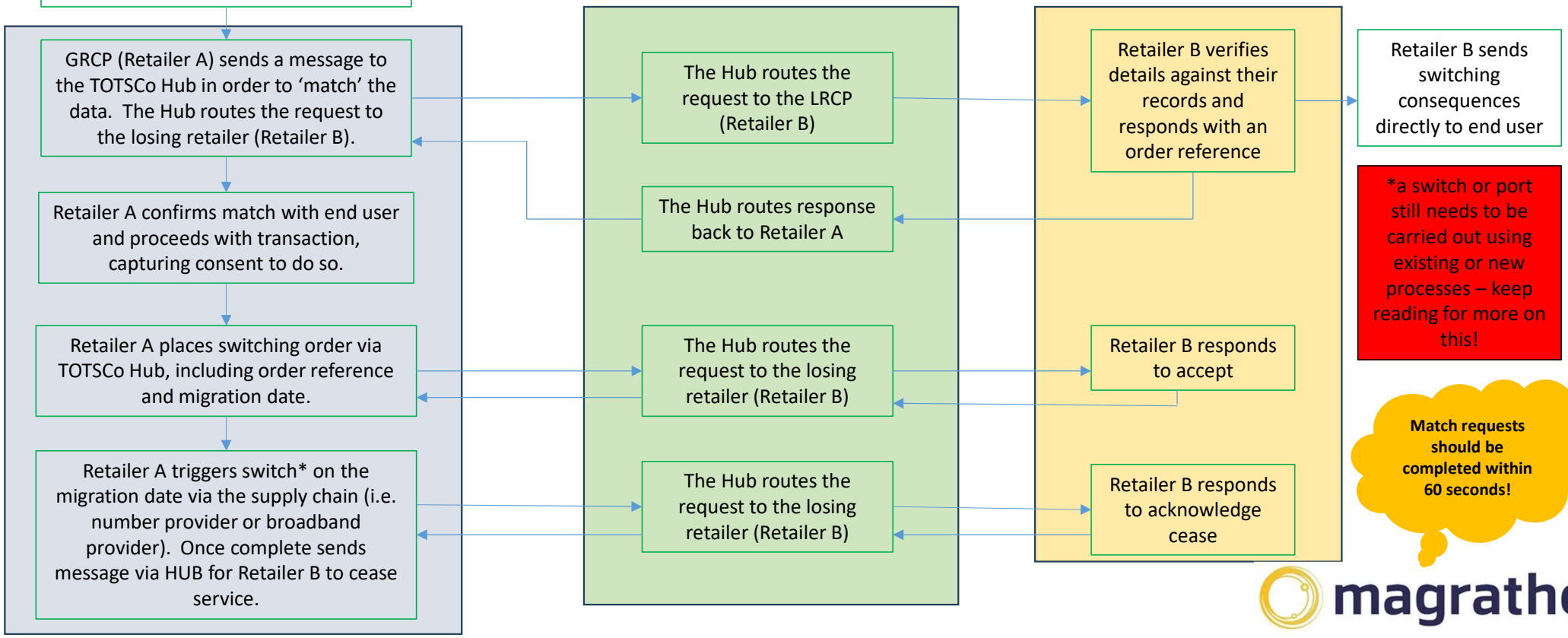
For full details visit the website https://totsco.org.uk

magrathea

High level process – residential end user

End user approaches their new chosen service provider (Retailer A), providing details of their existing service that they want to switch.

This high level overview describes a simple successful transaction, for a more detailed but still high level process please continue through this presentation. For the full process in detail please see the process guide at totsco.org.uk/totsco-hub-user-guides/



magrathea

Number Portability
A new process to align with OTS

OTS Porting Process (Express Porting)

For **single line orders** only, the OTS porting process is intended to speed up the activity that goes on behind the scenes for a simple switch of an NBICS service (i.e. a single phone number) between providers. This is an 'on demand' process designed to eliminate lengthy lead times. It is expected that the largest providers which are vertically integrated will make use of this initially, but all OTS participants are encouraged to introduce this to improve the porting experience.

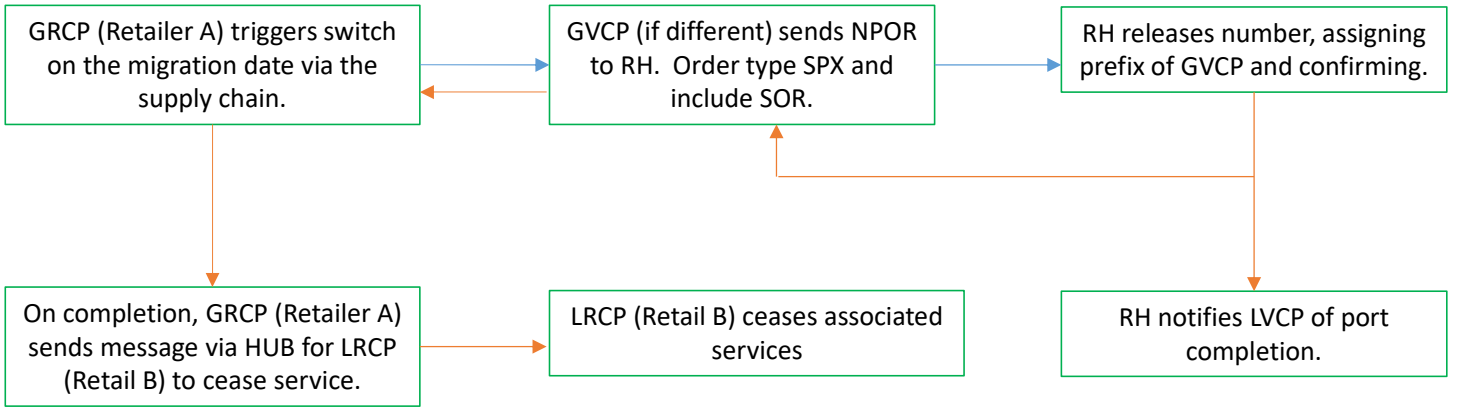
The immediacy of such orders mean some common order types are no longer needed – represents, changes, cancel own and cancel other will all be rejected. The standard NPOR (order form) is being redesigned to include the necessary information to confirm that an order has already been validated via the TOTSCo Hub and therefore does not need to go through the usual validation process.

SPX	Switch Port Execute (new porting type "express porting")
SPQ	Switch Port Query (new porting type "query port details")
SOR	Switch Order Reference (unique identifier attached by TOTSCo Hub)
GRCP/LRCP	Gaining/Losing Retail Communication Provider
GVCP/LVCP	Gaining/Losing Voice Communications Provider
RH	Range Holder

magrathea

OTS Porting Process – Simple Port

Assumes OTS match complete and GRCP has checked that express porting is supported by losing provider



Supply chain may choose to validate SOR through the TOTSCo Hub, if they have access, or work on trust knowing erroneous orders can be traced!

999 and DQ actions completed as usual by GVCP and RH

magrathea

Business Users

GPL Switching

Note: To determine if a service is business or residential you would normally rely on the contract in place, rather than the service use case.

First steps (Business)

With business installations generally being more complex, a separate process is being created by an industry working group – GPLB-SG. This group is co-chaired by the OTA and FCS. Full details can be found at www.fcs.org.uk/gaining-provider-led-business-switching/

Why is industry considering using the TOTSCo Hub even though Ofcom haven't mandated it for business?
Because many retail providers serve the residential and the business market, it could make sense to have one solution.

Why is it taking so long to decide?
The GPLB-SG have taken some time to explore other options before deciding TOTSCo is likely to be the best solution. Meanwhile, TOTSCo have faced their own delays with the go live date for residential switches shifting to September 2024. Ofcom have made it clear that nothing should stand in the way of OTS being ready for residential users by that date, so TOTSCo can't afford to be distracted from this plan!

Why might industry now decide to use an alternative method to meet GPL obligations for business users?
TOTSCo could still decide not to accommodate the business process, or the cost could be too high, or it might take too long. In that case we would have to revisit other options. These include:

- *Rely on alternative solutions to support gaining provider led switching*. This isn't as simple as it sounds though as there is currently no common process for IAS switching and the removal of the 'Notice of Transfer' (NOT) process used by Openreach, and others, in September means NBICS switches will be left without a 'Cancel Other' option, which could be damaging to complex business order management.

- *Use an existing MAP provider.* Many of the MAP providers who are collaborating with TOTSCo have other solutions that we could use, with or without engaging with TOTSCo. However, it's looking likely that they can and will interact with the TOTSCo Hub at least for the exchange of messages.

- *Create a new solution*. Industry could decide to disregard work done so far on the residential side and do something entirely new. This may be dependent on cost and time constraints but is being researched by an independent industry group (TAG), this is at a very early stage.

magrathea

GPLB-SG (Industry Working Group – Business)

Formed with the specific aim of "designing and establishing a Gaining Provider Led Business Switching process", the GPLB-SG meets fortnightly and is co-chaired by Jack Abbots of the OTA (john.abbots@offta.org.uk) and Megan Corcoran of the FCS (mcorcoran@fcs.org.uk).

The current draft process is summarised in the following slides. There is still lots of work to do however to translate this into an operational solution. We will continue to provide updates as the project evolves. The intention is to create a solution that brings about many benefits for providers, including:

- Compliance with Ofcom GC C7
- Losing provider gets awareness of intent to switch, giving an opportunity to inform the user of implications of the switch
- A single process enabling multi-lateral communication, remove the need to establish bilateral relationships with all providers
- Built in dispute process to help protect end users
- Complimentary solution to number porting, speeding up validation process

And we note there are some key questions still to be answered:

- What will it cost? *The OTS solution is funded by a fee for each subscriber, regardless of quantity of switches.*
- Will it rely on TOTSCo or some other entity? *Industry will need to decide if Ofcom stay mute on the point.*
- How will business retailers access the system? *Consideration is made for a simple portal for smaller providers.*
- Can the solution handle complex business installations safely and with appropriate support? *Without NOT+ we need to make sure there is an alternative to Cancel Other and decent emergency restore processes in place.*

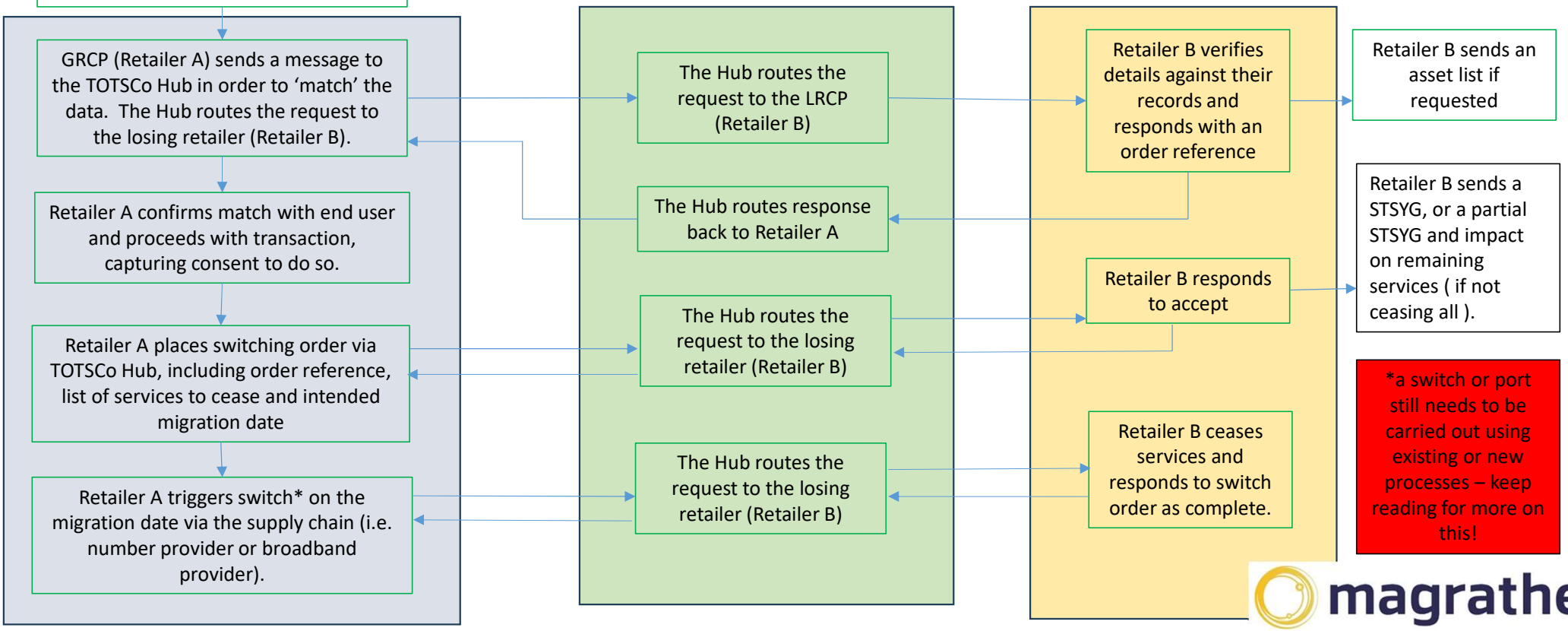
For full details visit the website www.fcs.org.uk/gplb-sg/

magrathea

High level process – business end user

End user approaches their new chosen service provider (Retailer A), providing details of their existing service that they want to switch.

This high level overview describes a simple successful transaction, for a more detailed but still high level process please continue through this presentation. For the full process in detail please refer to the FCS website www.fcs.org.uk/gplb-sg/



magrathea

Process Diagrams

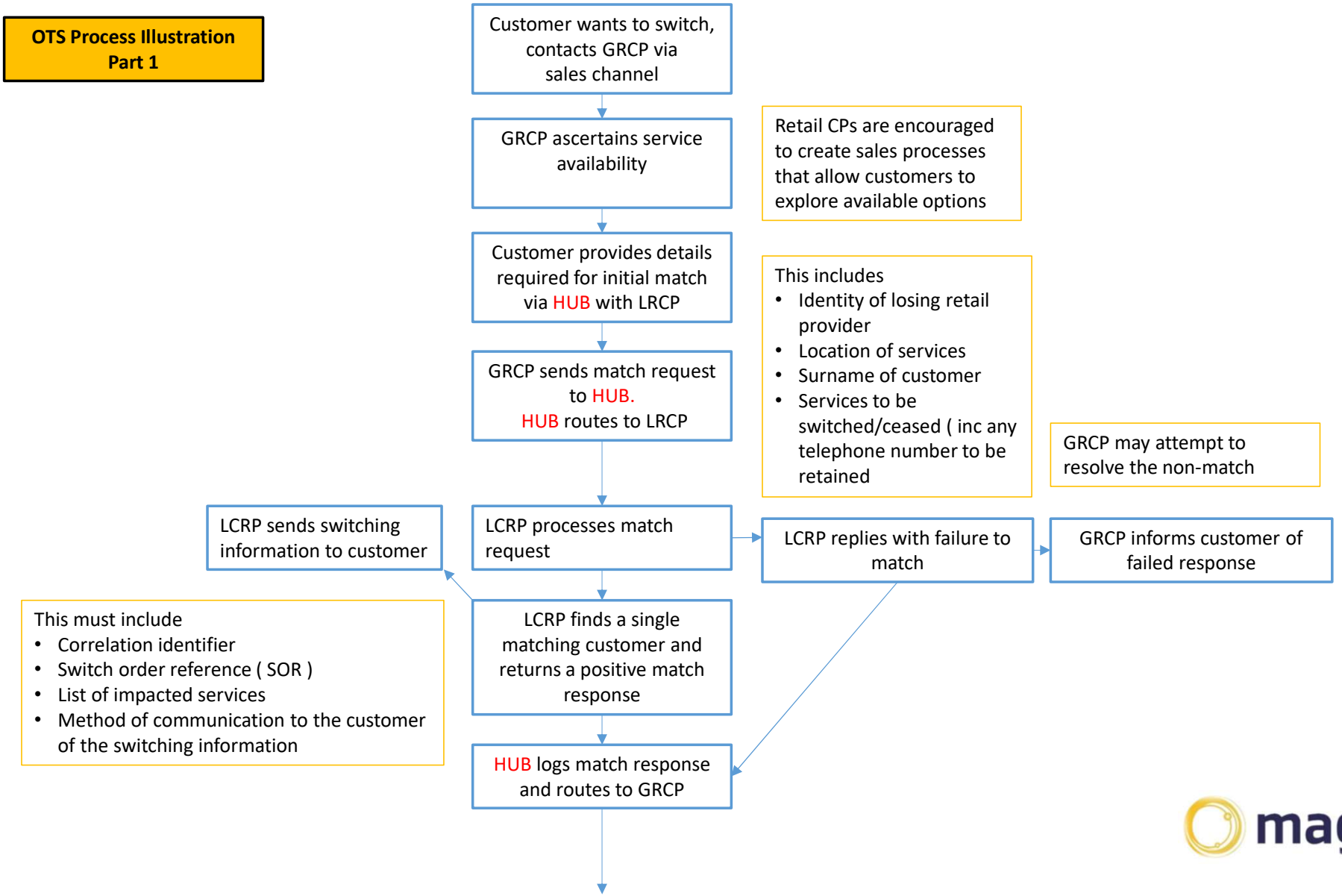
What follows is a brief version of the OTS process and the GPLB process, created to improve understanding and prompt interaction with the working groups. It is not to be relied upon for developing your own processes and procedures.

For the full detailed and final industry process please visit:

https://totsco.org.uk/totsco-hub-user-guides/ for OTS (residential)

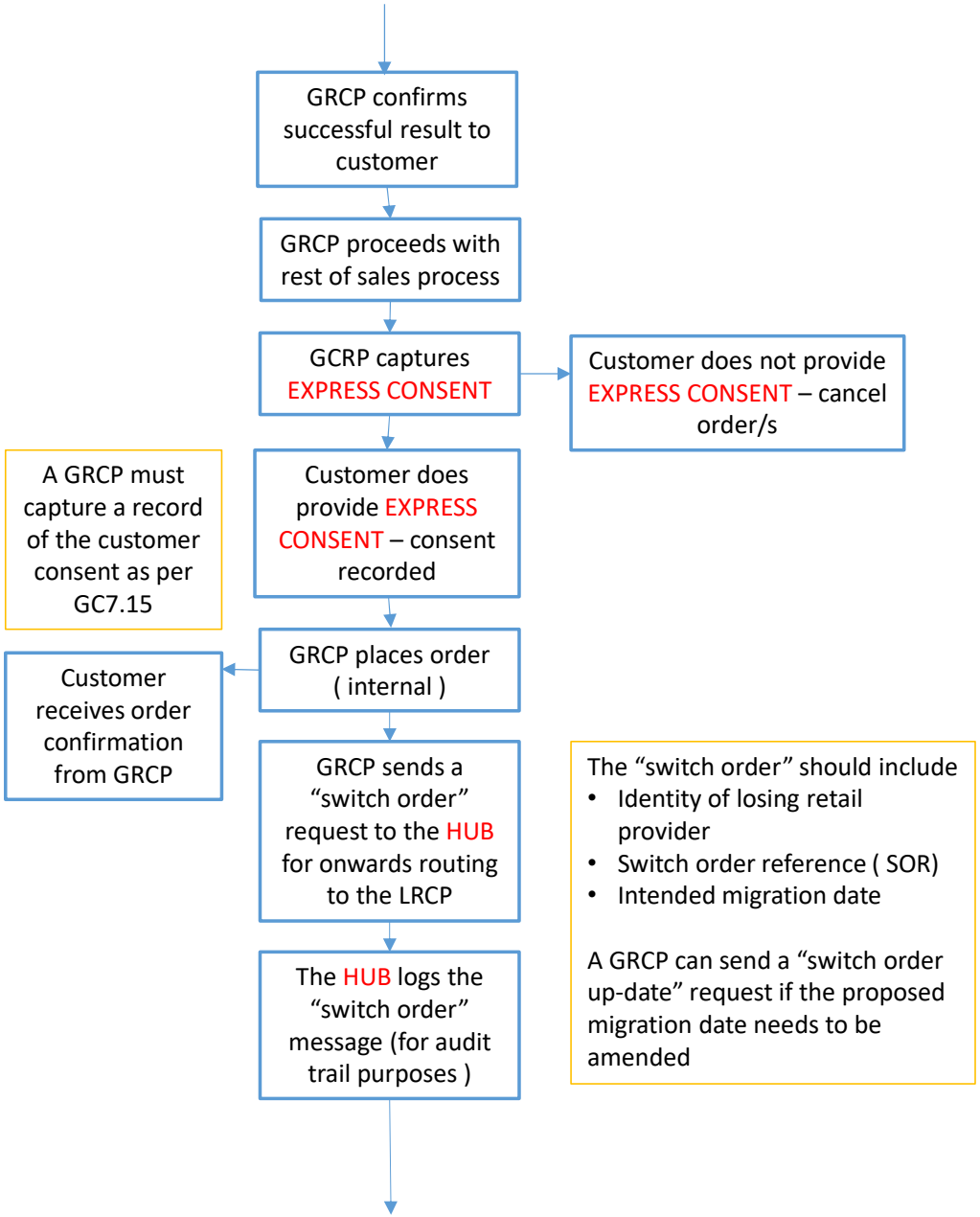
www.fcs.org.uk/gplb-sg/ for GPL (business)

OTS Process Illustration Part 1



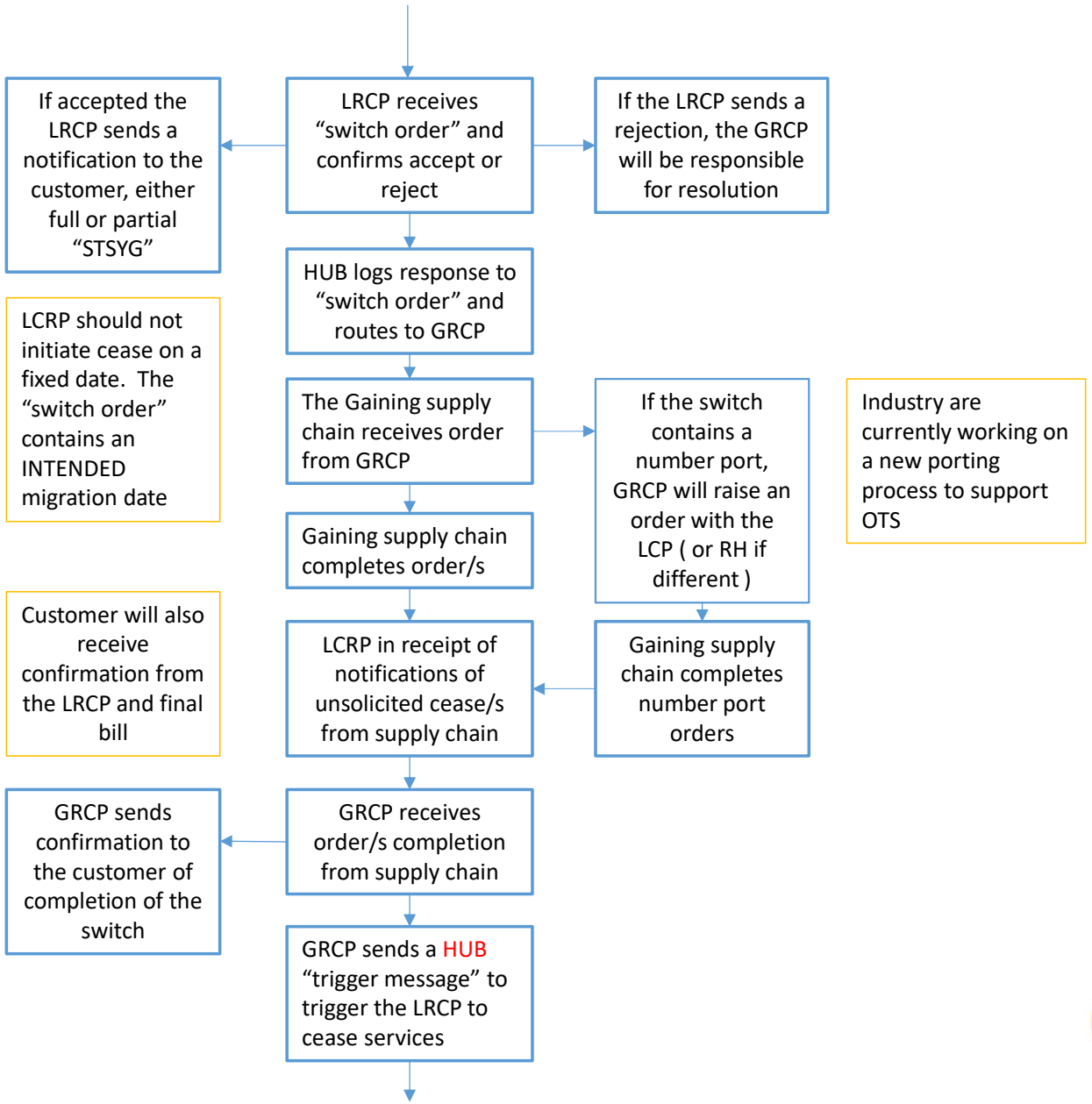
magrathea

OTS Process Illustration Part 2



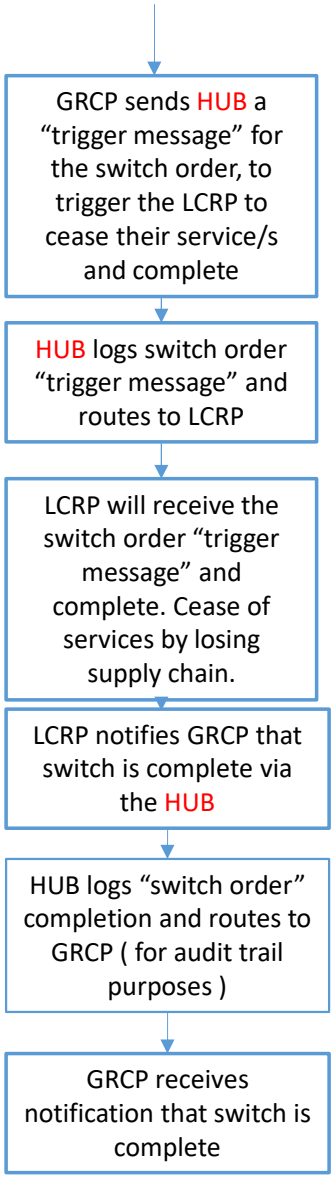
magrathea

OTS Process Illustration Part 3



magrathea

OTS Process Illustration Part 4

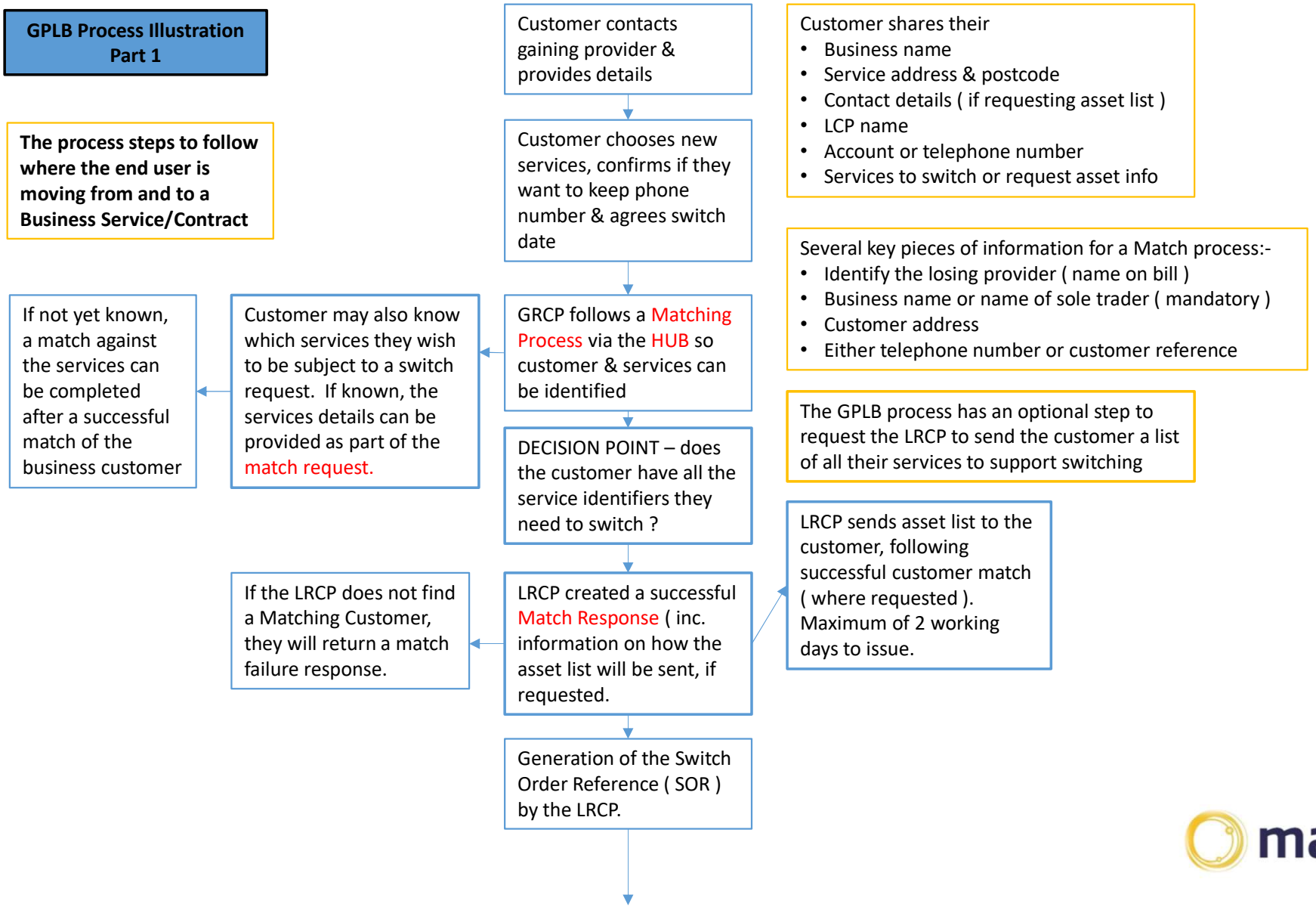


GRCP should monitor for lack of receipt from the LCRP and treat as similar to other order failures

magrathea

GPLB Process Illustration Part 1

The process steps to follow where the end user is moving from and to a Business Service/Contract



Customer shares their
- Business name
- Service address & postcode
- Contact details (if requesting asset list)
- LCP name
- Account or telephone number
- Services to switch or request asset info

Several key pieces of information for a Match process:-
- Identify the losing provider (name on bill)
- Business name or name of sole trader (mandatory)
- Customer address
- Either telephone number or customer reference

The GPLB process has an optional step to request the LRCP to send the customer a list of all their services to support switching

LRCP sends asset list to the customer, following successful customer match (where requested). Maximum of 2 working days to issue.

magrathea

GPLB Process Illustration Part 2

Following the successful Customer Match, the GRCP will be able to make additional Service Match requests against the SOR via the HUB

To perform a Service Match the following information is required:-

- Service Identifier (optional for IAS but mandatory for NBICS)
- Type of service (NBICS or IAS, mandatory)
- Address associated with service
- Action to take – cease or port

LRCP processes Service Match request/s via the HUB

LRCP replies with failure to match via the HUB

GRCP received failed Match Response via the HUB. Resolutions include correction to information already provided and/or addition of extra information.

LRCP finds Service Match, returns positive match response via the HUB.

There are several key pieces of information that the LRCP must include in the response message:-

- List of impacted services
- Whether or not switching information has been sent to the customer (mandatory)
- Details about the services to be switched

GRCP obtains EXPRESS CONSENT. They must obtain the customer's express consent before they can submit a switch order to the HUB (and corresponding processes with their supply chain). The GRCP needs to retain a record of consent.

LRCP sends switching information to customer, using e-mail, SMS or post – please see Industry Process for full details

Disputed switches – there may be instances where the LRCP may be contacted by their customer to dispute the validity of the switch.

A dispute is raised using the message facility. The LRCP should raise a Business Switch Notification, including:-

- SOR
- Nature of message under "dispute hold"
- Severity level

Please see Industry process for full details.

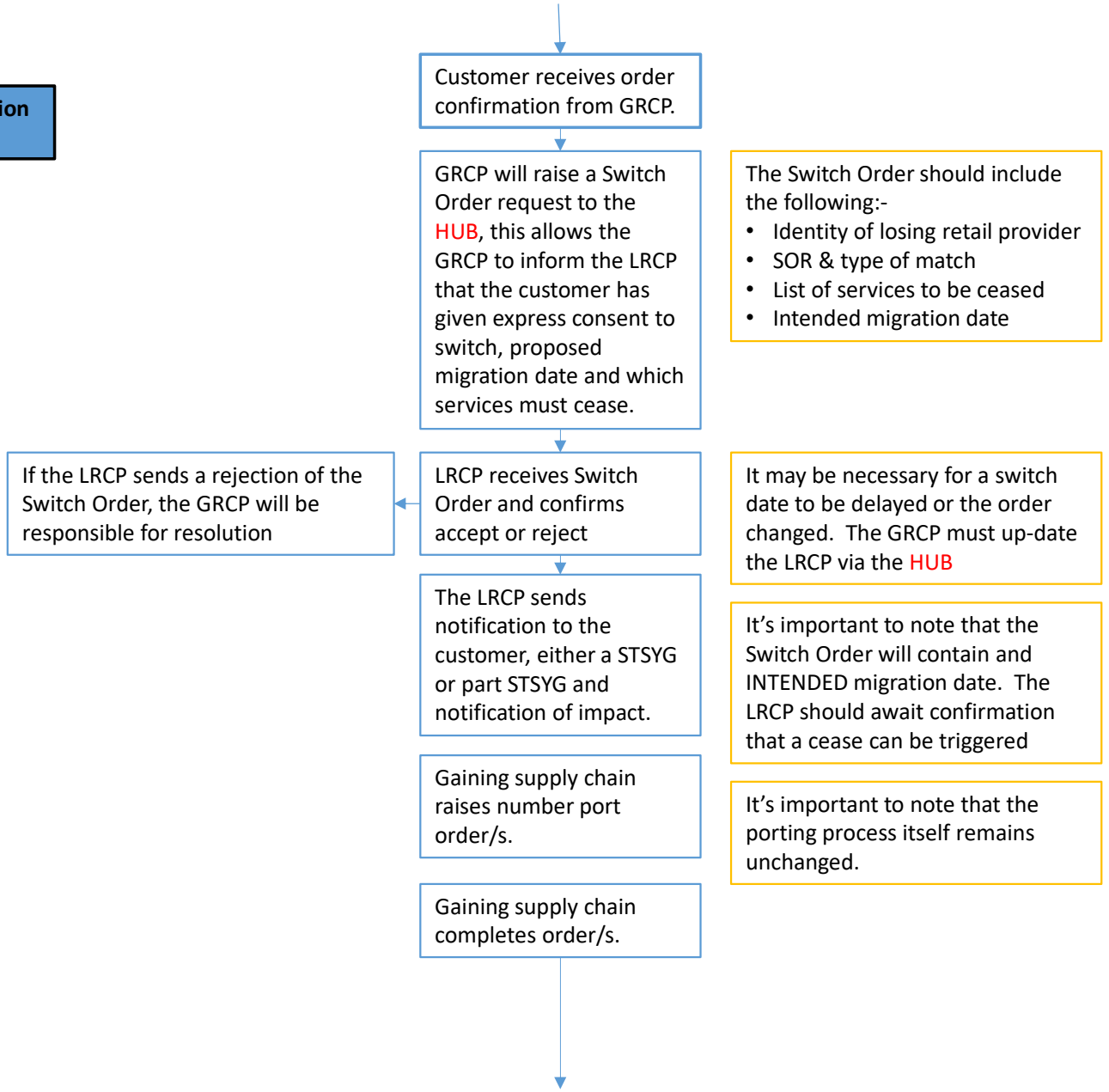
Any dispute should, under Best Practice guidelines, be reviewed within 4 working hours.

Rate Limiting – LRCP are permitted to "rate limit" their dispatch of notifications with switching information. This principle also applies to the asset list production.

After gaining and recording express consent, the GRCP completes any steps required for their own orders, including agreeing a migration date

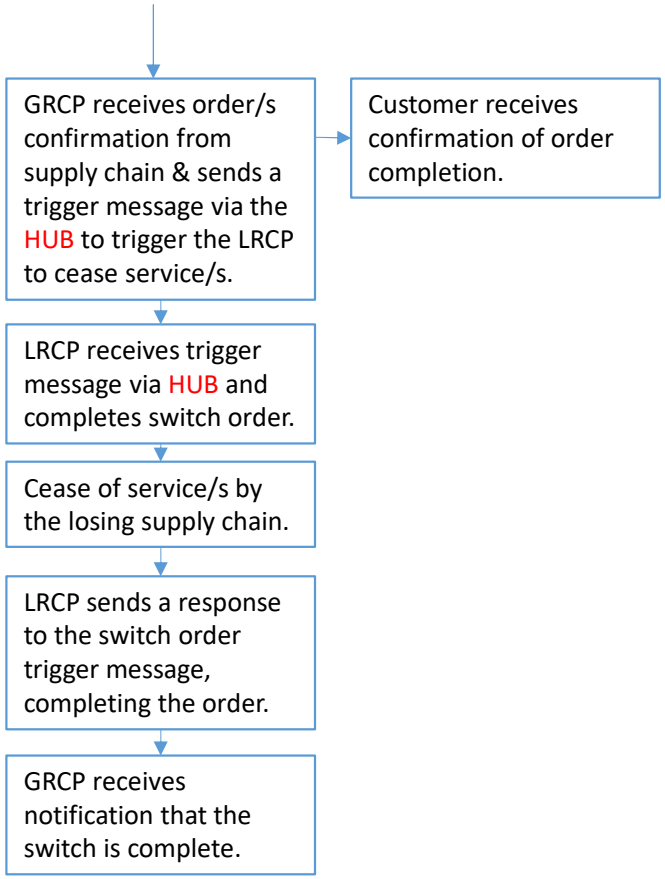
magrathea

GPLB Process Illustration Part 3



magrathea

GPLB Process Illustration Part 4



magrathea

We hope this document has been useful. If you have any queries please contact us at support@magrathea-telecom.co.uk or on 0345 004 0040

magrathea