

Switching Implications SLA Consultation – January/ February 2023

In January 2023, The One Touch Switch Company (TOTSCo) consulted industry members regarding the Service Level Agreement for the dispatch of Switching Implications to customers in the One Touch Switch process.

The proposed SLA wording was as follows:

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Dispatch of impacts of switching.

For an LRCP with access to a consumer e-mail address or mobile number, switching information is to be sent by one or both of these means:

- within 60 seconds of the receipt of a matching request from the GRCP in 99% of cases
- within 1 hour of the receipt of a matching request in 100% of cases.

In other cases, or where the consumer has indicated that communication is to be via surface mail, the LRCP is to send a letter by first class post:

- where the matching request is received before 4pm on a working day, by 5pm on the same day in 99% of cases, and by 12pm the following day in 100% of cases.
- where the matching request is received at any other time, by 12pm on the next working day in 99% of cases, and by 5pm on the following working day in 100% of cases.

<End Quote>

TOTSCo invited industry members to provide comments on the proposed SLA wording in relation to the below criteria:

- Impact on Customer Experience
- Practical Issues Involved in Complying with the SLA
- Costs Involved in complying with the SLA
- Time to Implement Any Necessary Changes
- Alternative SLA Suggestions

The full text of the SI SLA Consultation can be found in Appendix 1.

General Summary of Responses in relation to E-mail

28 responses were received in relation to the consultation (please see Appendix 2 for a table of these). Responses to the consultation were confidential and cannot be reproduced in full. The results of the consultation are summarised below:

- Eleven respondents felt the SLA was feasible with two respondents suggesting it is potentially not strict enough
- Several respondents felt the SLA was not feasible for smaller CPs who may not have the infrastructure to automate the dispatch of switching implications.
- Some respondents expressed concern that they can only guarantee when switching implications have been sent, but they cannot guarantee when these have been received
- A minority of respondents felt that smaller communications providers should be exempt from the SLA or even that no SLA should be applicable

Impact on Customer Experience

- Very few respondents directly addressed there being an impact on the customer experience. Some suggested that even if the SLAs were met, there is no way to guarantee when the customer will receive the message, so a good customer experience cannot be ensured.

Practical Issues Involved in Complying with the SLA

- Several respondents (primarily smaller entities) expressed concern with the practicalities of using an automation to meet the SLA given their small customer base
- Some respondents stated that a live environment is required in order to confirm ability to meet the SLA.

Costs Involved in complying with the SLA

- Several respondents (primarily smaller entities) expressed concern with the cost implications of using an automation to meet the SLA given their small customer base

Time to Implement Any Necessary Changes

- Some respondents (primarily smaller entities) expressed concern with the time required to implement the changes.

Alternative SLA Suggestions

- Some respondents (primarily smaller entities) suggested that a separate, SLA should apply to entities depending on their size
- Some respondents suggested that the SLA should be more lenient – around 5 minutes for a response.
- Some respondents suggested the time should be measured from a successful match request rather than receipt of the match request.

General Summary of Responses in relation to Mail

28 responses were received in relation to the consultation (please see Appendix 3 for a table of these). Responses to the consultation were confidential and cannot be reproduced in full. The results of the consultation are summarised below:

- Fewer respondents directly addressed the proposed SLA for Mail, just 17 of the 28 responses
- Of the respondents, around half felt the measures were too strict
- The specific concerns were around collection of post and how this was not within their control
- Several respondents mentioned that first class post placed an additional financial burden while offering no guarantee of faster delivery than second class post

Impact on Customer Experience

- Very few respondents directly addressed there being an impact on the customer experience. Some suggested that even if the SLAs were met, there is no way to guarantee when the customer will receive the message, so a good customer experience cannot be ensured.
- Some respondents suggested that the increased cost to use first class post could be recompensed through increased customer charges

Practical Issues Involved in Complying with the SLA

- Several respondents stated that issues with postal collection schedules and post office locations means there were challenges in meeting the SLA
- Several respondents pointed to the fact that postal collection is often out of their hands and could mean they are unable to meet an SLA despite preparation of the letter

Costs Involved in complying with the SLA

- Several respondents suggested that the use of first class post over second class post placed an additional cost burden and did not guarantee faster delivery

Time to Implement Any Necessary Changes

- No respondents gave an opinion related to this.

Alternative SLA Suggestions

- Several respondents suggested more lenient SLAs with an earlier cut off time for same day turnaround
- Several respondents suggested the SLA should be enhanced to include additional time allowance for letters that have special requirements (e.g. Braille and Audio)

Recommended SLA

As a result of the TOTSCo SI SLA Consultation of January 2023, please see the below recommendation for a revised SLA:

Dispatch of impacts of switching by email/SMS*	Within 60 seconds of receipt of a match request from the gaining provider in 99% of cases. Within 1 hour of the receipt of a matching request in 100% of cases. Time is measured from successful delivery of the switch match request.
Dispatch of impacts of switching by letter	When the match request is received before 13:00 on a work day, 99% by the end of that work day and 100% by 12:00 the following work day. When the match request is received after 13:00 on a work day or received on a non-work day, 99% by 12:00 the following work day and 100% by the end of the following work day. CPs remain responsible for meeting their obligations under the Equality Act, including making reasonable adjustments by providing letters in other formats such as Braille or Audio. In these circumstances, a short delay in sending letters in other formats will not automatically constitute a breach of this SLA. 1 st Class Royal Mail service to be used.

*SMS refers to the sending of impacts of switching by SMS or sending a link via SMS to a separate document containing the impacts of switching. It does not refer to the use of SMS to inform the customer that the impacts of switching have been sent via a different medium e.g. post

This SLA has been constructed based on the feedback from the consultation. While a number of smaller CPs made it clear they are concerned about their ability to automate their systems, it is felt there are, or will be, sufficient options for them to use in order to meet the SLA.

First class post has been selected on the basis of the general conditions specifying that the fastest possible method of communication should be used

Appendix 1 – Full Text of TOTSCo January 2023 SI SLA Consultation

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Introduction

The One Touch Switching Company Ltd (“TOTSCo”) is consulting with industry on a proposed change to the One Touch Switch (“OTS”) Industry Process. The change concerns a Service Level Agreement (“SLA”) for the dispatch of switching information to the Switching Customer. Terms used in this consultation are defined in the April 2023 General Conditions and/or the OTS Industry Process V4.1.

The proposal

It is proposed that the following SLA is added to the One Touch Switch Industry Process:

Appendix 1: SLAs and response times.

“Dispatch of impacts of switching.

For an LRCP with access to a consumer e-mail address or mobile number, switching information is to be sent by one or both of these means:

- within 60 seconds of the receipt of a matching request from the GRCP in 99% of cases
- within 1 hour of the receipt of a matching request in 100% of cases.

In other cases, or where the consumer has indicated that communication is to be via surface mail, the LRCP is to send a letter by first class post:

- where the matching request is received before 4pm on a working day, by 5pm on the same day in 99% of cases, and by 12pm the following day in 100% of cases.
- where the matching request is received at any other time, by 12pm on the next working day in 99% of cases, and by 5pm on the following working day in 100% of cases.”

Background to the proposed change

The April 2023 General Conditions require Communications Providers (“CPs”) to implement and operate the switching process known as One Touch Switch (“OTS”) for residential customers who are switching Fixed Communications Services at the same location.

OTS requires the Losing Provider to send certain information to the Switching Customer including any early termination charges. The information to be provided to the Switching Customer by the Losing

Provider is detailed in the General Conditions C7.12. For the purposes of this consultation this is referred to as the “Switching Information” or “SI”.

Condition C7.27 of the General Conditions obliges the Losing Provider to make the SI available “promptly in accordance with any applicable industry agreed processes and via the quickest communication method, unless the Fixed Switching Customer requests an alternative switching method.” Condition C7.4 requires CPs to maintain “simple and efficient processes” for switching, and further requires that CPs do not delay or abuse the process.

In an open letter to the OTS Steering Group and fixed voice and broadband providers, dated 3 March 2022, Ofcom restated their policy objective of a “quick, easy and reliable” OTS process, and set a target expectation of a 60 second response to a matching request.

TOTSCo believes that an SLA should be defined for the time taken for the Losing Provider to provide Switching Information to customers after receipt of a matching request. This will bring clarity to CPs and to users of the process. Without an SLA, CPs may implement a range of service levels, leading to confusion in the industry and to a variable customer experience.

So that a switching order can take place within the reasonable parameters of a sales discussion or online customer journey, TOTSCo proposes that the SI should be sent within 60 seconds of the receipt of a matching request. This will:

- give the Switching Customer the best experience, as receiving the Switching Information during the sales discussion or online customer journey will allow while not requiring a repeat call or pausing the switching journey
- give effect to the GC requirement for the LP to supply the SI “promptly”.

Respond to consultation

TOTSCo welcomes views on all matters related to the proposal, including but not limited to:

- Impact on customer experience
- Challenges in complying with the proposed SLA

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- Time to implement any necessary changes to comply with the proposed SLA.

The consultation is in particular seeking the views of:

- Communication Providers serving residential customers

Trade associations representing the above.

Other industry participants are also welcome to respond, including:

Communications Providers with business customers, as they may use parts of the OTS process in the future

Providers of IT services which may be used by Communications Providers in generating and despatching Switching Information.

To take part in the consultation, please send your submissions by any of the following methods:

e-mail admin@totSCO.org.uk quoting "SI SLA Consultation" in the subject line

complete the submission form below

by post to our registered office: F.A.O TOTSCO "SLA Consultation", 10 Fitzroy Square, London, W1T 5HP

In all cases, please include in your response:

- your own name and position within the organisation
- the name of the entity on whose behalf you are responding (only one response per entity should be submitted)
- the nature of the entity (e.g. CP, other body) and its interest in the generation and dispatch of Switching Information
- where the entity is a CP providing fixed voice and /or broadband services, whether it has residential customers.
- please indicate clearly if any part of the response is confidential.

Submissions must be received by Friday 13 January. Responses are in confidence and will not be published although points made may be used in open discussions where doing so does not allow the source to be identified. By responding, you confirm that you have the authority to act on behalf of the organisation.

A decision on whether the proposed change is to be incorporated in the OTS Industry Process will be made in due course and will be notified to all who participate in the consultation and communicated widely within the industry as a whole.

<End Quote>

Appendix 2 – Summary of Responses for E-Mail

Responder	Stricter	Substantially OK	Less strict	Micro CP exempt	No SLA	No response	Body	CP, Size
R1			1				CP	SMALL
R2						1	CP	SMALL
R3			1				CP	SMALL
R4		1					CP	MED
R5		1					VOIP wholesaler	
R6		1					Platform	
R7			1				CP	SMALL
R8			1				CP	SMALL
R9				1			CP	SMALL
R10			1				CP	SMALL
R11						1	CP	SMALL
R12		1					CP	MED
R13	1						CP	SMALL

R14	1			CP	SMALL
R15		1		CP	MED
R16			1	CP	SMALL
R17			1	Reps Small CPs	
R18			1	TA	
R19		1		CP	LARGE
R20				1 TA	
R21		1		CP	SMALL
R22		1		CP	SMALL
R23			1	CP	MED
R24		1		CP	LARGE
R25			1	CP	SMALL
R26		1		CP	LARGE
R27				1 CP	SMALL
R28		1		CP	MED

Appendix 3 – Summary of Responses for Mail

Responder	Substantially OK	Less strict	Micro CP exempt	No SLA	No response	Body	CP, Size
R1					1	CP	SMALL
R2					1	CP	SMALL
R3					1	CP	SMALL
R4		1				CP	MED
R5		1				CP	
R6	1					Platform	
R7		1				CP	SMALL
R8					1	CP	SMALL
R9					1	CP	SMALL
R10					1	CP	SMALL
R11				1		CP	SMALL
R12					1	CP	MED
R13	1					CP	SMALL

R14			1	CP	SMALL
R15	1			CP	MED
R16		1		CP	SMALL
R17			1	Reps Small CPs	
R18			1	TA	
R19	1			CP	LARGE
R20			1	TA	
R21		1		CP	SMALL
R22	1			CP	SMALL
R23		1		CP	MED
R24		1		CP	LARGE
R25			1	CP	SMALL
R26		1		CP	LARGE
R27			1	CP	SMALL
R28			1	CP	MED