



One Touch Switch Open Orders

A best practice guide

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1 Introduction

This document is one of a series of best practice guides related to One Touch Switching. This document focuses on customers who have an open order with their LRCP when they try to match or switch. The lead author was a member of the original design drafting group (OTS-DDG), and the content has been reviewed by the Industry Process Group which is co-chaired by TOTSCo and OTA2.

The intended audience of this document is personnel responsible for the technical implementation of One Touch Switching in retail communications providers and MAPs, including business analysts, solution architects, and implementation and testing teams.

It is assumed that readers are familiar with both the OTS Industry Process and the OTS Message Specification which can be found at <https://totsco.org.uk/process-technical-documents/>. If you are not familiar with the content of those documents, you are strongly encouraged to download and read them before reading this document.

1.1 Change log

Version Date Changed by	Reason for change
V0.1 First draft 06/09/2023 Niall Gillespie	First draft for discussion and review by the OTS Industry Process Group.
V0.2 Draft 29/09/2023 Niall Gillespie	Draft for industry consultation.
V1.0 28/10/2023 Niall Gillespie	<ul style="list-style-type: none">Extended §8 to make clear the handling at time of matching and at time of receipt of switch order request.Updates to Appendix A on Openreach handling, and ripple effects throughout the document.Added §7 with guidance on RCP initiated migrations.

1.2 Contributing authors

Author	Organisation
Niall Gillespie	BT

1.3 Abbreviations and definitions

Abbreviation / term	Meaning / definition
TOTSCo	The One Touch Switching Company www.totSCO.org.uk
TOTSCo Hub	This is the formal name used by TOTSCo to refer to the hub which will provide services to CPs in support of OTS and GPLB processes, and possibly for other industry processes in the future. TOTSCo have chosen Tech Mahindra to implement and operate the TOTSCo Hub.
CP	Communications provider This is a term defined by Ofcom in their General Conditions of Entitlement as: “a person who provides an Electronic Communications Network or an Electronic Communications Service”.
RCP	Retail CP. This term was first defined in the OTS Industry Process (and re-used in the GPLB documentation) to define those CPs who provide services at the retail level to end-users, both consumer and business.
MAP	Managed Access Provider This is the term used by TOTSCo to refer to providers of “Managed Access Solutions” for RCPs who do not wish to interact directly with the TOTSCo Hub, and who wish instead to use the services of a TPI to interact with the Hub.
TPI	Third party integrator This is a commonly used term within the UK telecoms industry to refer to parties who provide integrations services to CPs, but are not themselves CPs.
OTA2	The Office of Telecommunications Adjudicator. The OTA2 was established as a follow-on to the original OTA Scheme, and is independent of Ofcom and of industry.
CRD	Customer Required by Date A common term indicating the date that the customer has stated as their requirement in a captured order, e.g. for provision, regrade or cessation.
CCD	Customer Committed Date Supply chains are sometimes not able to meet the CRD, and instead return a date that they can commit to. Delays are more common on provision and regrade orders. Cease orders tend to have short lead times (usually same day), so any CRD can generally be met.
PONR	Point Of No Return A common term indicating the cut-off time for amending or cancelling an open order. It is often specified relative to CCD, e.g. “CCD-1;16:00” means 4pm on the calendar day before CCD.

2 Reminder of the steps for a switch under the OTS process

The OTS Industry Process defines three steps for switching:

1. Matching, including dispatch of implications of switching by the LRCP.
2. Switch order initiation, using an SOR (switch order reference) returned from an earlier match.
3. Switch trigger, sent by the GRCP when they are ready for the LRCP to cease existing services.

Additionally, a switch order may be updated (to change the proposed migration date) or cancelled.

3 Types of open orders covered in this guide

This document covers the following scenarios which fall under a general banner of “open order”:

- The customer has placed a future-dated cease order.
- The customer is in a dunning process, where a future step might be cessation of service.
- The customer is in any other breach of contract situation¹, where a future step might also be cessation of service.
- The customer has placed a regrade order with an expected future completion date.
- The RCP has placed a regrade order (e.g. in support of WLR withdrawal) with an expected future completion date.
 - These could be individual orders, or a bulk update process.
- Another switch order is open with an expected future switch date.

This document uses the terms “cease order” and “cessation” to refer to orders which have the effect of stopping or ceasing existing services. The term “cancellation” for some is a synonym of “cessation” (e.g. cancellation of contract) and for others an open order can be cancelled, including an open cease order!! So this document avoids use of “cancellation”, except in the context of cancelling an open order.

Some RCPs refer to “voluntary cease” when initiated by a customer and “involuntary cease” when initiated by the RCP, e.g. for lack of payment (dunning process) or other breach of contract.

From the point of view of a supply chain, all orders received from the retailer are “retailer/CP initiated”, and the supply chain may have no visibility of whether they are voluntary or involuntary ceases.

The term “open order” refers to any order that has been placed and submitted into relevant supply chains, but have not yet completed nor have been cancelled. Some RCPs use the term “in-flight order” or “fluid order”, at least for open orders that have not encountered any failure or rejection. “Pending order” tends to mean an order that has not been submitted (e.g. awaiting customer payment of a required deposit).

The term “future dated cease order” refers to an open cease order with a requested future date for the cessation to happen – Openreach refer to this as the “pending cease date” (but it would not be a “pending order” by the definition above!). In the absence of any cancellation of the open cease order, the services are expected to be ceased on that requested future date.

¹ This includes situations where the customer is suspected of using their services for some fraudulent, malicious or illegal purposes, or where a competent authority has asked the CP to support some investigation or restrict services.

4 Customer initiated cease order with future date

Even with current GPL processes such as NOT+², some customers believe that it is necessary for them to initiate a cease order with their LRCP. Advisors working for LRCPs should be trained to advise customers of the existence of GPL processes, and to advise customer that they do not need to (and should not) place a cease order with their LRCP. However:

- Customers do not always provide the correct information to advisors.
- Many customers have an awareness that “the best way to get a retention offer is to say you are leaving” and then some find that they have placed a cease order, and have forced themselves into a switch.
- Customers may treat the advisors of their LRCP in a disrespectful manner, and use language which leads that advisor to a reasonable view that they wish to place a cease order³.

Openreach have documented how they handle transfer orders placed against a line which has a future-dated cease – the LRCP initiated cease is cancelled and replaced by the managed cease associated with the transfer order. OTA2, Openreach and Openreach CPs developed this process based on experience of the behaviour of real customers over the years of operation of the NOT+ process. Some alt-nets providing wholesale offerings will have followed this OTA2/Openreach precedent (both since it makes sense and to offer consistency to any RCP who purchases services from both Openreach and an alt-net). VMO2 also currently handle number exports in a similar fashion.

The customer could place (or attempt to place) their cease order at different points in time relative to the steps of the OTS process:

- Before they initiate a match request with a potential GRCP.
- After a match request (and generation of SOR), but before they provide their express consent to the GRCP to initiate a switch order.
- After they have initiated a switch order.
- After the GRCP has triggered the switch order⁴.

4.1 Principle: OTS takes priority over customer initiated ceases

Best practice

The general presumption of a customer wishing to use the OTS process who has also raised a cease order with their LRCP is that the customer has not understood the GPL nature of OTS, and the OTS switch order should take precedence over the customer’s cease order.

When a customer contacts an RCP to raise a cease order, the RCP should check the customer’s intent and advise of the OTS process where the customer is wishing to switch, but is not aware of the GPL nature of OTS.

RCPs should consider suitable training of their advisors, and suitable guidance for self-service customers⁵.

² Enhanced Notice of Transfer (NOT+) was the Ofcom mandated gaining provide led process that removed use of the losing provide led Migration Authorisation Code (MAC) process for broadband switching on 20 June 2015. It applied only to intra-Openreach switching. Background can be found at [Statement on the processes for switching fixed voice and broadband providers on the Openreach copper network - Ofcom](#)

³ A customer may use a phrase such as “take you broadband and shove it...” and the advisor may reply “no problem, placing your cease order now...”

⁴ The customer could approach their LRCP to ask to place a cease order after the GRCP has triggered the switch order. The LRCP should advise the customer that it is not necessary to place a cease order, even if they have not yet received the trigger, or have not yet processed it fully. Note also that a customer could make contact to request cessation of other services which were not switched (e.g. a TV service) – the handling of this may vary between RCPs (e.g. some RCPs may not be able to accept a cease of TV until their cease of fixed line services is complete).

⁵ Some RCPs do not permit cessation via self-service channels, but Ofcom’s GC 7.10(a) mandates that customer are adequately informed before and during the process – so guidance will still be needed for customers to access.

Note that if a customer contacts the LRCP with an open cease order (e.g. after receiving impacts of switching), each RCP can define their own processes, e.g. to cancel the pending cease, or advise the customer of the automated cancellation.

4.2 Open cease order at time of matching

An open cease order at time of matching is not considered to be a barrier to generating an SOR and sending impacts of switching to the customer. The customer could be shopping around for a potential GRCP to switch to, and may even be aware that they might need to cancel their future-dated cease order.

OTA2 / Openreach have established a precedent that a transfer order takes precedence over a cease order, and this precedence is known to Ofcom. Thus an OTS switch order should also take precedence over a customer initiated cease order.

Best practice

If the customer has an open cease order at the time of matching, the LRCP should advise the customer of this in the impacts of switching, including the expected completion date of the cessation, and advise the customer to place any switch order before the PONR of the cessation order, in which case the cessation order will be automatically cancelled by the LRCP in favour of the switch order.

4.3 Open cease order at time of switch order request

An open cease order at time of receipt of the switch order request by the LRCP should not be a barrier to switching, unless the switch order is received past the PONR of the cease order.

If the cease order had existed at the time of matching, the customer should have been advised in the impacts of switching. If the cease order was placed after matching, but before switch order request, the customer will not have been advised, but the handling should be the same.

Best practice

If the customer has a future dated cease order, and the LRCP received a switch order request before a reasonable cut-off time (PONR), the LRCP should automatically cancel the cease order, and advise the customer of this cancellation in the Sorry To See You Go comms (or in other comms⁶ sent in a similar timeframe).

The PONR should be reasonable. E.g. Openreach have a cut-off time of CCD-1;16:00 for cancellation of many order types, and the LRCP may add a few additional hours to cover processing within their own systems and any supply chain (e.g. BT Wholesale have a cut-off time of CCD-1;14:00). Cut-off times much earlier than this risk being considered by Ofcom to be a “frustration of the OTS process”.

The cancellation should happen before the LRCP returns confirmation of the switch order, so that the GRCP can infer that the cancellation has been completed. The SLA for acceptance of a switch order is 95% within one hour, so this implies that the cancellation is completed inside the same one hour.

If the switch order request is received after the PONR of the future dated cease order, the LRCP should reject the switch order with error code 1214 (There is an open cease order which is past point of no return and cannot be cancelled).

⁶ E.g. the LRCP may send a standard notice of cancellation of any order, which might suffice to keep the customer informed, without needing to explicitly include it in the STSYG comms.

4.4 Customer wishes to place a cease order with an open switch order or after triggering of a switch order

It is expected that RCPs will have processes to prevent customers placing cease orders whilst there is an open switch order, or after the switch order has been triggered (since the LRCP should then have either an open or complete cease order triggered by the switch completion).

Best practice

LRCPs should consider whether to prevent customers from placing a cease order when there is either an open switch order, or a switch order has been triggered.

Note that LRCPs may need to support customers who wish to cease services that will be retained by default on switching, but which the customer no longer requires. Possible approaches include:

- Raise separate cease orders for the other services, if feasible in that LRCP's systems.
- Ask the customer to return after the switch order has been triggered (or maybe "diary the request" for the order to be raised by the LRCP at a later date).
- Advise the customer of other switching processes, e.g. Auto-switch (PAC and STAC) to switch mobile services.

5 RCP initiated cease order due to any breach of contract

Most RCP use (or at least recognise) the term “dunning process” in relation to the steps they follow with a customer when they do not pay their bill. Typical steps include reminder notices and restriction of service⁷, with eventual disconnection followed by passing of the debt to a collections agency.

Disconnection by an RCP usually requires a cessation order (e.g. to request the supply chain to cease services). Some RCPs only raise such cessation orders when the dunning process reaches that decision point (i.e. if the earlier steps trigger the customer to make payment, there is no pending cease order to cancel or go through accidentally), and are an immediate request (e.g. CRD is same day). For these RCPs, this means that it is less likely that such a cease order is open at the time of receipt of either a match request or a switch order request though not impossible. Other RCPs raise a cease order in advance (and cancel that cease order if the customer makes payment). For these RCPs, it is more feasible to encounter an open cease order at the time of receipt of match or switch order.

There are other reasons why an RCP may cease a customer’s service for breach of contract, e.g. mis-use. Although these processes may differ from dunning, they typically also include a step for disconnection of service, which again is typically a same-day cease order.

This document aims to cover both RCPs who raise same-day cease orders for any breach of contract situation, regardless of the particular breach, and those RCPs who raise advance cease orders, e.g. in a dunning process.

5.1 Principle: OTS and ceases due to breach of contract run in parallel

The Ofcom Statements and General Conditions include provisions around “no gap in service”.

However in other statements they have indicated that commercial processes such as dunning are not impacted by the introduction of OTS.

Best practice

RCP’s processes for breach of contract (e.g. non-payment) typically reach a stage where services are fully disconnected (e.g. a cease order into the supply chain). We will call this the “disconnect date”.

An LRCP may execute a cease order on the disconnect date if the switch order has not yet been triggered.

If the switch order trigger arrives before the disconnect date, the relevant cease required in support of the switch should be triggered (with any other non-switched services perhaps only being ceased on the disconnect date).

The LRCP may also apply restrictions on service as per their standard process, regardless of an open switch order.

Note that the above best practice refers to when the trigger arrives, rather than when the switch was planned. E.g:

- Switch is planned before disconnect date, but GRCP has some delay and sends the trigger after the disconnect date – the services would have been ceased on the disconnect date.
- Switch is initially planned before disconnect date, but is amended to a date that is later. Services will be ceased on the disconnect date.

5.2 Open cease order at time of matching or switch order request

Although it is expected that some cease orders raised in response to a breach of contract (e.g. lack of payment) will be short lived (i.e. CRD is for same day, and the cease order will not be open for long), it is feasible that an LRCP will have such a cease order in an open state at the time of receipt of either the match request or switch order request.

It is valid for the LRCP to treat such an open order (not customer initiated) in either of two ways:

⁷ Restriction of service can take several forms, including for voice: attempted outbound calls connecting to payment advice information, and “temporarily out of service” (TOS); and for broadband: redirection of all http traffic to a payment page.

1. The LRCP could ignore the presence of the open order, and handle the match or switch order as if there was no open cease. This is valid because a cease order for breach of contract could also be raised after sending a successful response to a match request, or after accepting a switch order.
2. If the LRCP's cease order for breach of contract are short-lived, with very little incidence of failure or opportunity for cancellation, and thus the cease is imminent, the LRCP may treat the match request or switch order request as if the cease order had completed and the impacted services had already been ceased.

However, if the LRCP's policy is to raise a pending cease which stays open for a period of days, and could be cancelled (e.g. customer makes a payment), then option 2 above may be deemed unreasonable, and the LRCP would have to follow option 1.

Best practice

LRCPs should consider their practices around raising cease orders for any breach of contract situations (including lack of payment), and choose between the two options above.

5.3 Completed cease order at time of switch order request

If the services were active at the time of matching (so an SOR was returned), but have been ceased by the time a switch order request is received, there are no services to be switched. So the LRCP should return a rejection with faultCode 1212 (All services requested to be ceased are no longer active).

5.4 Completed cease order at time of OTS trigger / update / cancellation

If the services were active at the time of receipt of the switch order request (so the request was accepted), but are subsequently ceased before receipt of the switch order trigger, then some GDPR considerations come into play.

A cessation following acceptance of a switch order request is an involuntary cease, and the reason for the cease could possibly be considered private information. The customer should be aware of the reasons for and completion of the cessation. One GDPR principle is to minimise information sharing, unless absolutely necessary.

The trigger message is effectively a request from the GRCP for the LRCP to cease services. If the services have already been ceased by the LRCP, they can respond to the trigger request with a confirmation, and not expose any potentially private information to the GRCP.

Similarly, a request to amend a switch order can only change the planned migration date (e.g. to stop the switch order timing out if there is a provisioning delay) – so again the LRCP can respond to the amend request with a confirmation.

We can also apply this principle to cancellation (albeit that cancelling a switch order will not restore any services that have already been ceased!).

Best practice

When an LRCP ceases services after acceptance of a switch order request (which should only happen for an “involuntary cease”), they should send confirmation in response to any subsequent amend, trigger or cancellation.⁸

⁸ Note that this does prevent rejection of attempted amend, trigger or cancellation of switch orders that have been completed or cancelled – it only applies to switch orders that are still open, where the services have been ceased via an involuntary cease.

6 Customer initiated regrade order

Most RCPs have four highest level classifications of order types: provision for new customers; modify (or change) for existing customer making a change; cessation for existing customers; and home move (often a combination of cessation, provision and modify).

Modify or change orders can be further split into sub-classifications:

- At one extreme are short lived orders, e.g. for commercial re-contract, but without any underlying service changes in the supply chain.
- At the other extreme are long lived orders, typically involving a supply chain element, e.g. a technology change from copper to full-fibre, with an associated engineering visit and lead times measured in days or longer – this is often called a “technology regrade” and abbreviated to “tech regrade”.
- Other forms of regrade (e.g. speed change implemented remotely, but perhaps with a next day lead time for the supply chain) sit between the above extremes.

Modify or change orders can be triggered by customer request, or by RCP action (e.g. moving customer off of WLR) – see §7 below for RCP initiated migrations.

Delays on a long lived order (e.g. delay by network operator in providing a committed data for installation of full-fibre) could trigger a customer to consider switching to another RCP.

6.1 Principle: OTS takes priority over long-lived customer initiated regrade orders, but subject to PONR

Best practice

The general presumption of a customer wishing to use the OTS process who has also raised a regrade order with their LRCP (or the LRCP has raised a regrade order) is that the customer’s later instructions (OTS) take precedence over their earlier instructions (regrade).

However, if customer (or GRCP) leaves it too late, it will be too late to override the initial instructions (past the PONR to cancel the regrade).

6.2 Open regrade order at time of matching

An open regrade order at time of matching is not considered to be a barrier to generating an SOR and sending impacts of switching to the customer. The customer could be shopping around for a potential GRCP to switch to, and the handling of the regrade order by their LRCP may even be a trigger to consider switching⁹.

Note that Openreach have established a precedent that a regrade order (migration order in Openreach’s terminology) takes precedence over a transfer order, but this precedent does not sit comfortably with Ofcom’s statements and guidance. See Appendix A for more discussion on the interactions between OTS and Openreach processes.

Best practice

If the customer has an open regrade order at the time of matching, the LRCP should advise the customer of this in the impacts of switching, including the expected completion date of the regrade, and advise the customer to place any switch order before the PONR of the regrade order, in which case the regrade order will be automatically cancelled by the LRCP in favour of the switch order.

The LRCP should also consider whether to advise the customer of the process to cancel their future-dated regrade order.

⁹ E.g. their regrade order has taken longer than expected or promised; a forced move to new technology may trigger a customer to consider switching.

6.3 Open regrade order at time of switch order request

An open regrade order at time of receipt of the switch order request by the LRCP should not be a barrier to switching, unless the switch order request is received past the PONR of the regrade order.

If the regrade order had existed at the time of matching, the customer should have been advised in the impacts of switching. If the regrade order was placed after matching, but before switch order request, the customer will not have been advised, but the handling should be the same.

Best practice

If the customer has a future dated regrade order, and the LRCP received a switch order request before a reasonable cut-off time (PONR), the LRCP should automatically cancel the regrade order, and advise the customer of this cancellation in the Sorry To See You Go comms.

The PONR should be reasonable. E.g. Openreach have cut-off time of CCD-1;16:00 for cancellation of many order types, and the LRCP may add a few additional hours to cover processing within their own systems and any supply chain (e.g. BT Wholesale have a cut-off time of CCD-1;14:00). Cut-off times much earlier than this risk being considered by Ofcom to be a "frustration of the OTS process".

If the switch order is received after the PONR of the future dated regrade order, the LRCP should reject the switch order with error code 1215 (There is an open modify order which is past point of no return and cannot be cancelled).

6.4 Customer wishes to place a regrade order or recontract with an open switch order

If a customer contacts their LRCP at a time when they have an open switch order (i.e. the GRCP has sent a switch order request, but has not yet sent the trigger message), the RCP should have processes to at least make their advisor aware of the open switch order, so that they can handle the customer contact appropriately.

It is possible that the customer may wish to explore options with the LRCP, and might agree to re-contract with the LRCP instead of switching. The LRCP should advise the customer of the need for them to cancel their switch order with the GRCP, and the impacts of not doing so.

Possible ways to handle a customer agreeing to a recontract:

- Capture the customer's recontract order (with or without a regrade), but park that order such that it won't progress until the customer cancels the switch order with the GRCP (and by implication, won't progress if the customer does not cancel the switch).
- Capture the customer's order and progress it to completion without delay. However if the customer proceeds with their switch, it may then be necessary to consider a customer exercising their 14 day cancellation period under Consumer Contracts regulations.
- Agree with the customer what date the recontract will take place on, to give the customer an opportunity to cancel with the GRCP. The LRCP may monitor for an OTS cancellation, and chase the customer if the cancellation is not seen.

The customer may agree to a simple re-contract (no changes in physical services), or a full technology regrade (e.g. a move to full-fibre) with new contract. This may impact which of the possible ways listed above is used.

Best practice

LRCPs should consider whether to prevent customers from placing a regrade order when there is an open switch order, and there is no evidence that the customer intends to cancel the switch order.

LRCPs should also consider whether to prevent customers from entering into a CP-initiated regrade process (e.g. as a result of WLR withdrawal) when there is an open switch order.

LRCs should also consider how to handle customer who agree to a recontract (with or without a regrade) and agree that they will cancel their switch order with the GRCP.

7 RCP initiated migration order with future date

RCP may sometimes initiate migration orders on behalf of their customers. Examples include:

- Openreach are withdrawing WLR – national stop-sell was in September 2023, and withdrawal will be complete in 2025. RCPs have been and will be migrating customers from WLR to technologies such as SOGEA and FTTP, with VoIP for voice service.
- The business of an RCP may be purchased by another RCP who use different supply chains. E.g. this could result in customers being migrated from WLR to MPF.

There are various strategies to achieve these migrations:

- Customer elective – e.g. the customer wants to regrade from ADSL to FTTC, or ADSL/FTTC to FTTP, and the migration happens as part of the customer order. This tends to apply to early adopters.
- Individual orders – similar to customer initiated regrades, but initiated by the RCP.
- Bulk migration processes – these take various forms, but typically involve bulk migration files sent into a supply chain, with bulk asset updates in the retail CRM records. Importantly for this Best Practice Guide, there may be no “order”, and limited or no ability to stop a migration once the bulk files have been shared.

It is open to RCPs to treat their RCP initiated migration orders in the same way as customer initiated regrade order (as described in §6 above). However, this may not be practical for some RCPs, and this section outlines an alternative.

7.1 Principle: RCP initiated migration orders may take priority over OTS, but with limitations

RCP initiated migrations may have some of the following characteristics:

- The customer may see very little change in service (e.g. migration from WLR to MPF might have no impact on the customer’s services).
- Customers are typically not entered into a new contract when the RCP initiates a migration – this is important for a switch which happens shortly after a migration – the customer would not have to exercise any 14 day cooling off period.
 - If the customer is supplied with new CPE due to a migration, and then switch under OTS, the LRCP may expect the customer to return the CPE as per their contract with the customer.
- It may not be technically feasible (or be difficult) to cancel a migration – this is particularly applicable in bulk migration scenarios.
- There is a risk of customer harm if the migration is cancelled:
 - E.g. consider a customer being migrated off WLR, where Openreach have scheduled a shut-down date for their WLR exchange.
 - The LRCP has no control over the GRCP’s initial lead time and requested switch date, which could be beyond the Openreach shut-down date.
 - Even if the initial requested switch date is safe, the GRCP may experience delays:
 - These could be out of control of the GRCP – e.g. blocked ducts for a supply chain who use Openreach’s pole and duct sharing.
 - The customer could re-schedule with the GRCP.
 - The new switch date could be beyond the Openreach shut-down date.
 - The customer could cancel the switch order with the GRCP, and it may be too late for the LRCP to migrate the customer (or expensive to do so on an individual basis).
 - The risk of customer harm is that the customer ends up with no service, at least for a period of time.
- The migration does not usually take a long time.
 - E.g. bulk migrations typically happen in batches, which may have a longer lead time than a customer initiated regrade, but are typically a small number of weeks.
 - For the context of this Guide, this bullet point only refers to the stage of the overall migration process where bulk files are exchanged, and removing individual customers is either impossible, or very difficult. This document uses the term “locked-in stage” for this stage of the overall process.
 - Note that from the point of view of the LRCP, the overall migration process may take months. It would be unreasonable to prevent switches at stages where the customer is sent advance

notification, or where they were offered options (e.g. move to SOGEA or regrade to FTTP) or could opt-out.

Best practice

For an LRCP to utilise this alternative, they would need to satisfy themselves (taking appropriate legal advice) that they could defend their decision to reject some switch requests on the basis of the above bullet points, including limiting the “locked-in stage” to as short a period as possible.

The LRCP should also communicate to the customer that they are being migrated, and that switching will not be feasible during a limited window.

7.2 Customer is being migrated at time of switch order request

If a customer is at the “locked-in stage” of an RCP initiated migration, the LRCP **may** consider this to be a barrier to switching.

Best practice

If the customer has an open migration at the time of receipt of a switch order request, the LRCP should reject the match request with faultCode 1215 (“There is an open modify order which is past point of no return and cannot be cancelled. <Optional text to provide expected date of completion>”).

LRCPs wishing to use this alternative approach should populate the optional text with an explanation that the customer’s service(s) are being migrated, and the expected date of completion.

7.3 Customer is being migrated at time of matching

V0.2 of this Guide was shared with industry for feedback – some of the feedback was in relation to RCP initiated migrations, some of which use bulk processes which limit cancellation during the “locked-in stage”, and with the risk of customer harm as described above.

The TOTSCo Industry Process Group discussed this feedback, and sought to strike a balance between not obliging RCPs to cancel migrations, especially where they are using bulk processes, and introducing a change to the overall process.

Consideration was given to adding a 11xx code to also reject match requests when a customer was at the “locked-in stage”. But this would have resulted in a change to the OTS response codes, and resultant impacts on all RCPs.

So the Process Group have proposed a compromise, where an LRCP with a customer at the “locked-in stage would accept the match request and return an SOR, but then may reject the switch order request with faultCode 1215, and thus avoid the need to cancel a migration.

This comes with obligations on the LRCP:

- Satisfy themselves that their use of this alternative is justified, considering the bullet point in §7.1 above, and taking appropriate legal advice.
- Keep the “locked-in stage” as short as technically feasible.
- Inform their customer that they are being migrated, and the window of the “locked-in stage” when the customer will not be able to make any other service amendments, including switching to a GRCP.
 - By informing their customers, they will reduce the risk of a customer attempting to switch during the “locked-in stage”.
- Consider what information should be included in the impacts of switching to warn the customer that they cannot switch for some time.

8 Another switch order

It is feasible that an LRCP receives a switch order when they already have another open switch order impacting the same customer service(s). There are several scenarios in which this could arise:

1. Mis-communication between husband and wife (or partners, or any other combination of household decision makers): one places a switch order with GRCP1 which is accepted, and the other places a switch order with GRCP2, which arrives second at the LRCP.¹⁰
2. Customer places a switch order with GRCP 1, request them to cancel the order, but places an order with GRCP2 before the cancellation request passes from GRCP1 to the LRCP and is fully processed.¹¹
3. Customer places a switch order with their chosen GRCP. The GRCP encounters a failure, and their recovery process is a full cancellation and then issue a replacement order. But the replacement order is issued before the cancellation of the first is fully processed.

For the avoidance of doubt, “open switch order” implies that the LRCP has been sent a switch order request and has responded with a confirmation, but the switch order has not yet been triggered or cancelled. Confirmation of a match request is not an “open switch order”.

8.1 Principle: First switch order takes priority over any later switch order

Best practice

If an LRCP receives a switch order request, and they have another open switch order (i.e. not cancelled), they should reject the newly arrived switch order request.

If the rejection is due to a timing issue (e.g. scenarios 2 and 3 above), the GRCP can send a fresh switch order request once the blocking switch order has been fully cancelled.

8.2 Open switch order at time of matching

An open switch order at time of matching **is** considered to be a barrier to generating an SOR and sending additional impacts of switching to the customer.

Note that this differs from the handling of open cease and regrade orders – they would be cancelled if a switch order request was received, whereas an open switch order will not be cancelled – so it makes sense to also reject a match request.

Best practice

If the customer has an open switch order at the time of matching, the LRCP should reject the match request with faultCode 1111 (A switch is currently in progress).

8.3 Open switch order at time of switch order request

An open switch order at time of receipt of switch order request by the LRCP **is** considered to be a barrier to switching.

If the open switch orders had existed at the time of matching, no SOR would have been generated. So this scenario should only arise when another switch order is placed after generation of the SOR but before receipt of the switch order request quoting that SOR.

Best practice

If the customer has another open switch order at the time of receipt of a switch order request, the LRCP should reject the match request with faultCode 1211 (A switch is currently in progress).

¹⁰ Operations teams in a number of RCPs have confirmed that this does happen!!

¹¹ The delay could be due to any party in the chain.

9 Customer contact with LRCP after a switch order has been triggered

A customer may contact their LRCP after their switch order has been triggered. Possible reasons include:

- The customer has a query on the switch process, final bill, process for returning equipment, etc. It is expected that the LRCP will have processes to handle such queries.
- The LRCP may have retained a service which was not switched (e.g. TV), and the customer now wants to cease that service. It is expected that the LRCP will have processes to handle such requests.
 - Note the Ofcom requirement to advise customers of other switching processes, such as Auto-switch (PAC and STAC) for mobile services.
- The customer may not be aware of the switch and have a query or request normally associated with an existing customer. The LRCP should be able to advise the customer that services have been ceased due to a switch.
 - This could arise in a situation where there are multiple decision makers in a household who have not communicated well.
- The customer may allege that the services were switched without their consent. The LRCP may need to follow a restoration process, which is outside the scope of this Best Practice Guide on open orders.

10 Interaction with OTS Industry Process SLAs

There are a number of SLAs and response times documented in the OTS Industry Process which interact with the guidance in this Best Practice Guide. These are listed below.

10.1 Response to an OTS match request

This is defined as 95% within 60 seconds.

Although this Guide may introduce extra processing steps in the generation of a match response, the SLA is unchanged.

10.2 Acceptance or rejection of a switch order

This is defined as 95% within one hour, 99% within 2 hours.

It may not be feasible to cancel an open cease or regrade order inside 1 or 2 hours. Sometimes even automated supply chains do not process cancellations inside these timescales, and some cancellations may require manual processes which will only operate during working hours.

LRCPs should consider whether they think the volumes of switch orders which would require cancellation of an open order are likely to exceed 5% (for beyond one hour) or 1% (for beyond two hours), and otherwise consider their own regulatory compliance position.

11 Appendix A – Impacts on Openreach CPs

Note that the information in this section was not authored or maintained by Openreach. However, the authors believe that the information is correct at the time of writing (October 2023). CPs should check with Openreach for the latest available information.

This appendix outlines a number of impacts that Openreach CPs should be aware of, and may need to consider.

Note that Openreach refer to their customers as CPs, so this appendix uses “CP” in the context of Openreach, and “RCP” in the context of OTS.

The best practice documented in the earlier sections of this document potentially are in conflict with some of the detailed Openreach validations. Each of the sub-sections below firstly summarises the current Openreach handling and then calls out the potential conflict with the OTS best practice. Note that this document does not attempt to capture all of the Openreach detail, but rather to provide a decent summary to enable comparison with the OTS best practice.

11.1 Transfer with pending cease

In 2015 Ofcom raised concerns with OTA2 about scenarios where future-dated ceases were inappropriately being used to prevent end customers from switching CP; Ofcom asked OTA2 to work with industry to find a solution. Over a number of months OTA2 worked with Openreach and interested CPs to develop a set of rules which were subsequently implemented by Openreach on WLR, MPF, SMPF and FTTC products.

Similar rules were introduced in EMP release 5300 for transfers from FTTP to FTTP, and in release 5450 for transfers from other products to FTTP. Previous releases also covered SOGEA and SOTAP.

The following table is a partial list¹² of the Openreach EMP releases and the change references and titles.

EMP Release	Change ref
R3350	OR-34388: Allow fulfilment order journey to progress despite in-flight cease orders
R3400	OR-38321: Switch-on of OR-34388
R4050	OR-50341: L2C – Fix Transfer/Migration Order – Reject Transfer/Migration order if CCD Date is beyond Cease CCD
R5300	OR-78622: SOR8659: FTTP Fulfilment Rejection Reduction
R4150	OR-48945: Migration of Existing Working Services to SOTAP Part 1 - Order Placement and Progression to KCI2
R5450	OR-80828: SOR8659: FTTP L2C Rejection Reduction – Migrations

11.1.1 Current Openreach handling and validation

When a CP attempts to place a transfer order against an Openreach copper line (or ONT port) which has a pending cease (from an open cease order placed by the current CP), there a number of restrictions on accepting the transfer order:

1. If the requested transfer date is less than the min lead time for the requested product, the transfer order will be rejected.
 - For a transfer within copper products, the min lead time is currently (October 2023) 10 working days as per Ofcom’s NOT+ rules, but this will be reducing to next working day in support of OTS.
 - For a transfer of existing FTTP, the min lead time is as short as zero days.
 - Longer min lead time may apply when engineering work is required for the transfer, e.g. installation of new FTTP.

¹² It includes the original set of changes and the more recent changes for FTTP. It omits changes related to SOGEA, but includes one change for SOTAP.

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2. If the requested transfer date is prior to or equal to the pending cease date, the transfer order will be accepted.
 - However Openreach will return a committed date which equals the pending cease date, even if the requested transfer date was earlier.
 - The OTA2, Openreach and industry discussions agreed that the transfer order could not hasten the cessation initiated by the losing CP.
3. If the requested transfer date is later than the pending cease date, the transfer order will be rejected.
 - The industry discussions agreed that the principle that a transfer meant no gap in service had precedence.

If Openreach accept the transfer order:

- The cease order initiated by the current CP is cancelled by Openreach.
- Openreach create a new “managed cease” (aka unsolicited cease) as for any transfer order, and send relevant notifications to the losing CP.
 - I.e. the managed cease “replaces” the CP initiated cease.

Note that once this happens, the CP initiated cease is effectively forgotten by Openreach. The losing CP can use “Cancel Other” (if appropriate), the gaining CP can use “Cancel Own” or amend the date of the transfer.

- Note that if Openreach committed to a later date than the gaining CP’s CRD (as per point 2 above), the gaining CP could then amend the accepted transfer order to the CRD that they originally requested!!! (as long as there is sufficient lead time for that date).

11.1.2 Potential conflict between OTS and Openreach rules

Consider a customer who has placed a cease order with their current RCP for date B (e.g. lining up with a 14 day notice period), and then gives express consent to a GRCP for a switch order with an earlier date A (e.g. a transfer with next day lead time).

The OTS Industry Process recommends that the GRCP send off the OTS switch order and their supply chain order (i.e. Openreach for the CPs covered by this Appendix) in parallel.

The OTS switch order will be accepted (as long as it is placed before PONR relative to date B), and the LRCP will begin the process of cancelling their open cease order.

Openreach may accept the GRCP’s transfer order, but with a CCD of date B, before the LRCP has sent their cancellation request to Openreach.

11.1.3 Potential GRCP strategy to handle conflict when it arises

The GRCP may need to have a process (automated or manual) to amend their transfer order to date A, once they have received the committed date B.

If the GRCP wishes to place a transfer order for date C (later than the pending cease date B), they may have to await confirmation of the switch order by the LRCP, assuming that the LRCP should have cancelled their cease order before sending the confirmation. They could then place a transfer order for date C.

11.2 Transfer with pending change order

Note that Openreach tend to use the term “modify order” to refer to simpler change orders (such as bandwidth modify) – these are orders which require no engineering work and have short lead times.

Openreach tend to use the term “migration” when an order is moving a customer’s services from one technology to another (e.g. FTTC to FTTP).

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11.2.1 Current Openreach handling and validation

When a CP attempts to place a transfer order when there is an open modify order (simple change order), the transfer order will generally be accepted.

When a customer has an open migration order, (e.g. a technology regrade with a future expected completion date), the migration order will typically have triggered a managed cease of the old service. The presence of this managed cease will cause a transfer order to be rejected.

11.2.2 Potential conflict between OTS and Openreach rules

Consider a customer who has placed a migration order with their current RCP for date A (or the current RCP has placed a regrade order, e.g. in support of WLR withdrawal). The customer then gives express consent to a GRCP for a switch order, and the GRCP raises a transfer order (with or without migration).

The OTS Industry Process recommends that the GRCP send off the OTS switch order and their supply chain order (i.e. Openreach for the CPs covered by this Appendix) in parallel.

The OTS switch order will be accepted (as long as it is placed before PONR relative to date A), and the LRCP will begin the process of cancelling their open regrade/migration order.

Openreach may reject the GRCP's transfer order, before the LRCP has sent their cancellation request to Openreach.

11.2.3 Potential GRCP strategy to handle conflict when it arises

The GRCP may need to have a process (automated or manual) to resubmit their transfer order to Openreach, once they have received the confirmation of the OTS switch order from the LRCP, assuming that the LRCP should have cancelled their regrade order before sending the confirmation.

11.3 Transfer with pending transfer and managed cease

When a transfer order has been raised against a customer's line (or ONT port), Openreach will have created a managed cease order for the old service. This applies regardless of whether the transfer is a "level transfer" (e.g. SOGEA to SOGEA) or a migration (e.g. WLR/MPF + FTTC to FTTP).

11.3.1 Current Openreach handling and validation

When a CP attempts to place a transfer order when there is another open transfer order and associated managed cease, the transfer order is rejected.

11.3.2 No conflict between OTS and Openreach rules

The best practice documented in §8 above is that the LRCP should also reject the OTS order if they have another open switch order (from different or same GRCP). So there should be no conflict between OTS and Openreach rules for this scenario.

11.4 Attempt to cancel for breach of contract with open managed cease

It was noted in discussions in the Industry Process Group that if a customer has placed a transfer order with a GRCP, and the LRCP has thus been notified by Openreach of a managed cease order, it is not possible for the LRCP to initiate any cease order (e.g. due to a dunning process).

However this is an existing issue, and OTS makes this no better or worse.

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