

TOTSCo Bulletin No 73

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Subject: Guidance on dates in One Touch Switch messages

It has come to the attention of the OTS Industry Process Group (IPG) that there is an inconsistency around the understanding of the dates that are included within the OTS messages, specifically the activation date in a Switch Order Trigger Request and the planned switch date in a Switch Order Request or Switch Order Update Request. This bulletin also addresses a misunderstanding that has been observed around the expiry of SORs and the time that a GRCP has to trigger an order after a residential switch order request has been placed.

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MAPs and directly connected RCPs

The guidance in this bulletin applies both to RCPs who are directly connected to the TOTSCo Hub, and those who use a MAP. MAPs should consider the guidance in this document, and how they can assist their RCP customer to stay within the “guard rails” of this guidance, e.g. validation of manually entered dates.

Planned Date in Switch Order Request (and also Update Request)

The planned date is a means for the GRCP to inform the LRCP of when they **expect** the switch to complete. They have 31 days grace from the specified date to trigger the switch (e.g. provisioning is delayed by a few days). In the event that this period may be at risk (e.g. provisioning delay due to on-going survey and planning work), the GRCP will need to send a Switch Order Update Request to revise the date.

The planned date should **always** be either a present or future value date. If a back dated planned date is received, the recipient can return a failure message with response code 1203 or 1303 (Invalid or missing planned switch date) as appropriate.

In the event that the LRCP experiences an outage for any reason, there is a chance that by the time they have come back they will start receiving requests with dates that are now in the past, even though they were present or future valued when the GRCP sent them. In this situation, the LRCP should handle these messages and not send failure responses on the basis of the dates being backdated. RCPs may choose to always allow back-dating by a few days, such that after any short outage no messages are rejected, and there is less fallout from the outage requiring manual recovery (i.e. “give yourself a bit of wriggle room”).

While there is no limit regarding how far in advance a planned date can be, it is the recommendation of the IPG that this should be within 180 calendar days¹ of the current date, and that it would not be unreasonable for an LRCP to return a failure with 1203 or 1303 if this period is exceeded.

Activation Date in Switch Order Trigger Request

The activation date is included in the switch order trigger request and is a means for the GRCP to provide the LRCP with the date on which the GRCP provided service and started billing the customer. The Industry Process indicates at §9.17 that the GRCP will send the trigger message at the same time as it informs the customer of completion of the switch and provision of service and, therefore, it **should be expected** that the GRCP will include today's date as the activation date and will not back date the activation date. The GRCP **should not** include a future valued date as the activation date and the LRCP may return a failure response with 1403 (Invalid or missing activation date) if a future date is received.

If the GRCP sends a trigger request later than the date that they provisioned service and started billing, it would be more correct to describe this as a "late trigger message", although the LRCP will see a trigger message with a back-dated activation date. However some supply chains do not always send timely updates, so some GRCPs may send late trigger messages despite their best efforts.

While GRCPs **should** send the switch order trigger request on the activation date with that date included in the message (and avoid sending late trigger messages), if the LRCP receives a switch order trigger request with a back dated activation date, and they then reject that request, there is a risk of on-going parallel billing (in violation of GC C7.7(b)), and likely both the LRCP and GRCP will have manual handling to resolve the issue.

After much debate², the IPG agreed to recommend:

- LRCPs **should** accept late trigger messages, regardless of how far back the activation date is.
- LRCPs are **not obliged** to back-date their final date of billing – **it is acceptable** to stop billing on the date of receipt of the trigger message.
- LRCPs **should** record the received activation date in an audit trail, ideally easily retrievable by anyone who might be investigating a customer query or complaint about dual billing.
- LRCPs are **strongly encouraged** to monitor receipt of late trigger messages, and engage with GRCPs who regularly send trigger messages with significant back-dating.

Note that if an LRCP has had an outage which has caused delay to receipt of trigger messages, the LRCP should be aware that any delayed cessation may be wholly or partially due to their outage, and should be ready to deal with possible refunds due to dual billing.

Note also that for switches involving either an intra-network switch (e.g. a "CP migration" on the Openreach network) or a number port, the completion of those elements may have already triggered the LRCP to stop their billing, and the late arrival of an OTS trigger request may have no impact. See the "OTS Number Porting and Intra-Network Transfer Best Practice Guide" for further details on how LRCPs may handle such scenarios.

¹ The IPG started with "around 6 months" as seeming a reasonable period to permit advance orders – 180 days is a more precise value for all RCPs to work to.

² The IPG debated what limit of back dating to recommend, and considered (and discarded) the following suggestions:

- A period of a few days would be a small grace period, and ensure that any short outage by the LRCP did not require a lot of manual recovery.
- A period of 12 days would match the message delivery policy.



Switch orders remain valid for up to 31 days after the planned date

It has been observed that some LRCPs are returning response codes such as 1302, 1402 and 1502 if a request has been sent more than 31 days after the SOR was generated in a match confirmation.

Please note that there are two separate 31 day expiry periods:

- From when an SOR is generated, the GRCP has 31 days to send a switch order request using that SOR.
- Once a switch order request has been confirmed, it is valid for the GRCP to send updates / trigger / cancellation anytime up to 31 days after the planned date.
- If the planned date has been amended with an update request, the 31 days is relative to the most recently received planned date.

Please see Appendix 1 of the Industry Process for more details on this, specifically 'Expiry of an SOR' and 'Latest date to trigger an open switch order'.

Invalid date formats and invalid dates

All dates in OTS messages should be in "CCYY-MM-DD" format.

If a date is received in any other format, or a non-existent date such as 2025-02-29 is received, or the date element is missing or null, it is valid for the LRCP to return 1203 / 1303 / 1403 as applicable.