



Industry Best Practice Guide:

Migrations & Home Moves

for

Fixed Line Voice & Broadband Services



Contents

1	Introduction	3
2	Ofcom Regulations	3
3	Migrations.....	4
	3.1 MAC & NoT Processes	4
	3.2 MAC Migration Process.....	4
	3.3 NoT Migration Process.....	5
	3.4 Best Practice Processes	5
	3.5 Tags Avoidance – Do’s & Don’ts	6
	3.6 How to identify MPF using Dialogue Services –.....	6
4	Home Moves	8
	4.1 Working line exists at target premises.....	8
	4.2 Working Line ‘does not’ exist at target premises	9
5	Number Porting.....	9
	5.1 Number Porting processes.....	9
	5.2 Process documents.....	10
	5.3 Number Retention	10
6	Cancel Other Process.....	10
7	Appendices.....	12



1 Introduction

This guide is aimed at providing industry stakeholders with definitive and up to date guidance on Best Practice Processes to be used in satisfying the following scenarios:-

- **Migrations** - managing requests from individual End Users who are intending to switch part or all of their fixed line services to another Service Provider (SP) whilst remaining at the same address.
- **Home Moves** – managing requests from individual End Users who have decided to move home and require new services to be provided at the new address in a timely fashion at minimal cost. This may involve a change of Service Provider also.
- **Number Porting** – Enabling consumers to retain their existing telephone number(s) when switching services between suppliers &/or moving to a new address.

2 Ofcom Regulations

In the interests of:-

- maintaining a competitive market place, and
- ensuring the best possible consumer experience

Ofcom publish specific 'General Conditions' which are designed to help Service Providers (SPs) and Consumers understand their obligations & rights in the way services are provided.

The relevant General Conditions are:-

- GC 18 – Number Porting
- GC 22 – Broadband Service Migrations
- GC 24 – Sales & Marketing of Fixed Line Telecommunications Services

Subject to Openreach deploying the required process enabling functionality onto the Equivalence Management Platform trading platform (EMP), Industry is expected to develop & enhance their own internal systems capability to consume the latest EMP functionality and, by doing so, ensure the Best Practice processes described within this guide are consistently applied.

3 Migrations

A migration is the term used to describe the scenario when an End User decides to switch part or all of their existing fixed line services to a new SP whilst remaining at the same premises.

It is crucially important for the Gaining SP to establish at point of sale if it is a migration the customer wants and if so, to submit the appropriate order types to Openreach.

The End User should not be advised to cease any of their existing services as this will introduce unnecessary delay and possible additional charges. With any fixed line service migration the guiding principle is that the existing copper line should be re-used as opposed to unnecessary (and expensive) provision of a 2nd line to serve the same premises. The Gaining SP can confirm the presence of existing services using a combination of Openreach's 'Dialogue Services' and/or BT Wholesale's 'Availability Checkers'.

3.1 MAC & NoT Processes

There are currently 2 types of 'migrations' processes which are used by SPs to support consumers who wish to transfer part or all of their fixed line services to another SP.

These 2 processes are commonly referred to as:-

- Notification of Transfer process (NoT)
- Migrations Authorisation Code process (MAC)

Whilst these 2 processes are ultimately designed to do the same thing i.e. enable consumers to seamlessly switch their services between SPs, they are markedly different in terms of the following characteristics:-

- the type of consumer protection mechanism used
- the NoT process is 'gaining provider led' (GPL)
- the MAC process is 'losing provider led' (LPL)

Both processes have their relative pro's and con's but the presence of 2 different migrations processes can be a source of confusion for consumers and SP support staff alike.

Ofcom have commenced a 'strategic review of migrations processes' and, subject to Industry consultation, it is envisaged that industry will eventually adopt a 'single migrations process' to replace the 'hybrid' model which exists currently.

3.2 MAC Migration Process

This process is commonly described as a 'losing provider' led process as the Consumer is required to obtain a Migrations Authorisation Code (MAC) from their current Broadband SP before they can place a firm order with their chosen Gaining SP.

This process is applicable in those circumstances where the consumer is only switching their Broadband Service.

In the first instance, the Consumer would normally contact their Gaining SP, who would advise the Consumer as to whether they need to obtain a MAC code from their current SP or not. Once they have received their MAC code they need to re-contact their Gaining SP to place their order.

This process does not map cleanly to most face to face sales channels as the sale cannot be closed until a MAC code has been obtained from the losing SP.

3.3 NoT Migration Process

The NoT process is an example of a Gaining Provider-Led ('GPL') process where the consumer only needs to contact their Gaining Provider ('GP') to switch providers. The consumer will typically receive letters from both their GP and Losing Provider ('LP') (*Appendix D refers*) confirming the switch request details before it happens. This provides an opportunity for consumers to stop the order going ahead where they simply change their mind or in cases where they have no knowledge or have not given their consent to the attempted switch.

A key 'safety-net' mechanism is built into the process whereby a 10-day 'cooling-off' period is allowed to elapse before the transfer is actually executed. This gives the consumer adequate opportunity to abort the switch where they have changed their mind or have not given their consent to the attempted switch, if they so wish.

In the event that the Consumer decides to change their mind, and the 'point of no return' has not been missed, they can register their decision to 'cancel' with either the Gaining SP (i.e. Cancel Own) or, if the GSP refuses to do so, the Consumer can alternatively notify their current SP (i.e. the LSP) who can cancel the transfer order, on behalf of the consumer, from their end (i.e. Cancel Other).

This process caters for all types of sales channels e.g. retail shops, on-line website, door-step sales, telesales/cold call, call centre sales for inbound enquiries.

3.4 Best Practice Processes

A comprehensive matrix listing the 'best practice' process to be used for all possible migration scenarios is shown in *Appendix A*. There are some circumstances where the 'current' process is not ideal but has, in any event, been labelled as 'best practice process' pro-tem, pending further development.

For Broadband-only migrations (i.e. SMPF to SMPF migrations), all SPs have a regulatory obligation (GC 22) to use the designated MAC-based migration process.

For Voice-only migrations, no MAC is required and the migration order should be directly progressed by the 'Gaining' SP using the designated NoT-based process, in line with GC 24

For bundled Voice & Broadband migrations where the current and/or proposed access method is MPF, the order may be directly progressed by the Gaining SP using the appropriate NoT-based process. (i.e. no MAC is required)

For bundled Voice & Broadband migrations where the current 'AND' proposed access methods are 'WLR + SMPF', then the Gaining SP(s) should use the 'Parallel orders' process which currently requires both the NoT and MAC processes to be used. This process is not ideal from consumer's perspective and relies heavily on the Gaining SP advising the consumer of the specific steps to be taken to complete the overall migration.

- **Parallel Orders Process** - Where WLR+SMPF exists the gaining SP should instruct the end user to obtain a MAC code for the transfer of SMPF. In the meantime, the gaining SP can place an order to transfer the WLR service and then place a subsequent order to transfer the SMPF with a MAC for the same delivery date as the WLR transfer. However, if the losing WLR SP cancels the WLR transfer, for whatever reason, the SMPF transfer will still go through to completion. This maybe exactly what the gaining SP(s) and end users want to happen, but the Gaining SP(s) is responsible for managing the end user expectation in this situation.

With the Parallel Orders Process, the Gaining SP is allowed to place an SMPF transfer order whilst a WLR3 transfer is in flight (or vice versa). Whilst a parallel order does not link the two orders together, it does allow the Gaining SP(s) to manage the delivery date with the end user, thus delivering a managed transfer of both services regardless of whether there is 1 gaining SP (i.e. bundled service) or 2 SPs (i.e. split service).

For WLR2, the parallel orders facility is available, but in order to circumvent the existing WLR2 Open Orders rule, the WLR2 transfer order must be placed first to prevent the rejection of the subsequent SMPF order.

3.5 Tags Avoidance – Do's & Don'ts

The key objective from a tags-avoidance perspective is that a formal migration process (and order type) should be used in all migration situations, instead of cease and re-provide. By using the recommended migration process (as specified in *Appendix A*), the migration order type will synchronize the required (cease & provide) activities and thus avoid creating any unwelcome 'tags-on-line' which are common if the transaction is initiated by separate cease and provide orders.

Migrations from MPF have a very high incidence of tags if separate (i.e. discrete) orders are used for the WLR and SMPF parts. The only way to avoid Tags in this migration scenario is to use the Linked Orders Process (see below). In this scenario, SP agents will need to initially confirm the presence of a MPF line using the following process.

3.6 How to identify MPF using Dialogue Services –

The standard approach that SPs use to validate the customer's existing line is to use the customer's directory number (DN) as input to the Dialogue Services (i.e. availability checker). However, this approach will not work where the existing line is an MPF service as the DN will not be recognised by EMP.

In order to overcome this, the following process should be followed:-

If the inputted DN does not return any information for the line being queried, this could be for one of a number of reasons:-

- The DN inputted is incorrect (i.e. mis-keying).
- The telephone line for that DN has now been ceased (i.e. no longer live)
- The DN is one that is not on the Openreach network (e.g. a “cable” number).
- The customer has a MPF based service. The Openreach EMP systems will not recognise the DN associated with the MPF line. (i.e. the DN is not hosted on the BT PSTN network).
- The telephone service is in the course of being provided and the order has not yet closed on Openreach systems.

In order to confirm the presence of a working MPF line, then the following steps should be taken by the SP:-

- The customer’s address should be entered into the “Address Matching” dialogue service to “match” the customer’s address details (i.e. return a Gold ALK)
- Using the Gold ALK, the “Network Availability” dialogue service should be queried to find out what copper lines are present at that address. Each copper pair will have an Access Line ID and will also indicate the type of LLU product that is present.
- To find out more detailed line characteristic information on a particular copper pair, the relevant Access Line ID should be inserted into MLC (manage line characteristics).

The **Linked Orders Process** links the SMPF order to the WLR order and thus ensures that it gets the same priority treatment. The reason that this process will overcome the presence of any Tags, is that the provision of the WLR part is treated as the dominant product and has the ability to override most tags.

This is the correct process for SMPF SPs to use in the following situations because it gives the end user the best experience and overcomes the presence of any tags. Situations requiring the linked order process are:

- Migration from MPF
- Migration from Cable
- Home moves (i.e. where a working line does not currently exist)

The process uses a Linked Order Reference Number (LORN) whereby both orders (i.e. WLR + SMPF) are linked for the purposes of delivery ideally on the same day but, where the WLR order is delivered earlier the corresponding SMPF order will be delivered shortly after (subject to the minimum standard lead time for SMPF – 5 working days).

4 Home Moves

Home Moves involves End Users changing address and possibly their SP.

In determining the most appropriate process to use to support a consumer who is moving house, there are **2 possible scenarios**:-

4.1 Working line exists at target premises

Working Line Takeover Process – As the name suggests, this process is recommended if there is still a 'working' voice line in situ at the target address. Providing the 'inbound' consumer proactively contacts their chosen SP (i.e. Gaining SP) a few days before the planned homemove date, then the Gaining SP will be able to raise a 'Working Line takeover' order against the target line to deliver the new voice service. The 'incumbent' consumer (and their current SP) will be able to 'manage' the date of execution to avoid premature cessation of service.

This process was initially developed to enable seamless delivery of the consumer's voice service coincident with the homemove but has now been adapted to cater for the 'linked' provision of a SMPF facility to support the consumer's Broadband service.

This process can now be used where the service 'required' at the target premises is either 'WLR-based' (e.g. WLR+SMPF) or MPF-based. The 'existing' service at the target address may be either WLR or MPF-based.

Erroneous Landline Transfers – Following a number of consumer complaints and subsequent investigation, 2 issues have become apparent with regards to the Working Line Takeover process:-

- Issue 1 - Incorrect line taken over - it is apparent that a number of WLT orders are being submitted with either i) incorrect address or ii) incorrect line or iii) combination of both, with the negative consequence of somebody else's services being disconnected and taken over by another SP.
- Issue 2 - Ineffective 'safety-net' process (i.e. cancel other) – SPs are failing to use the cancel other process correctly allowing 'erroneous' orders to progress through to completion.

For issue no 1, (Incorrect line taken over) a study is underway to develop a remedy which significantly reduces the risk of 'rogue' orders entering the system in the first place. (i.e. correct address/line positively identified before WLT placed).

For issue no 2, (Ineffective 'safety-net' process) it is evident that the all important safety-net process which requires SPs to do specific things at specific times, is not sufficiently well documented or understood by SPs and, as a consequence, Ofcom have directed Industry to 'sign-up' to a new 'WLT Best Practice Guide' which specifies more clearly the SP's role & responsibilities within the WLT process.

Working Line Takeover – Best Practice Guide - Appendix B refers.

4.2 Working Line ‘does not’ exist at target premises

Linked Orders Process – In the event that there is no evidence of a ‘working line’ at the target address (e.g. previous occupant has already vacated premises) then the most appropriate process to use is the ‘Linked Orders Process’ described in the Home moves section above.

5 Number Porting

Number porting is concerned with the “shifting” of a telephone number from one telephone network to an alternative telephone network to allow the consumer to ‘retain’ their DN as part of a ‘migration’ or ‘home mover’ scenario.

Whilst the consumer would see number porting as an integral part of their overall migrations experience, the processes for porting numbers and migrating services are not as well integrated as they might be.

The reasons for this are historic but there is now industry recognition of the problem and work is in hand to develop the processes to improve the overall consumer experience.

Number-porting is generally required in the following migration/home mover scenarios:

- Moving from a WLR-based line rental service to a Cable-based line rental service (or vice versa).
- Moving from a WLR-based line rental service to an MPF-based line rental service. (or vice versa).
- Moving from a cable-based line rental service to an MPF-based line rental service.
- Moving from a MPF-based line rental service to another SP’s MPF-based line rental service. (or vice versa).

To enable the above, SPs have a statutory obligation under GC18 to establish porting arrangements between each other under GC18.

5.1 Number Porting processes

Number porting has 2 main order processes:

- **Direct Port** – this is where the customer’s existing line rental provider (sometimes called the Donor or Losing SP) is also the “range-holder” of the number – in this process the gaining provider (on behalf of the consumer) transacts directly with the losing-provider to arrange the number port to happen on the agreed date/time.
- **Subsequent Port** – this is where the customer’s existing line rental provider is not the “range-holder” of the number (e.g. the DN has been ported away from the RH previously) – in this process the gaining provider (on behalf of the consumer) transacts directly with both the current line-rental provider (to validate the customer) and the range-holder (to arrange for the number port), to arrange the number port to happen on the agreed date/time.

5.2 Process documents

Ofcom Porting information

<http://stakeholders.ofcom.org.uk/telecoms/numbering/guidance-tele-no/number-portability-info/>

Industry Process documentation

http://www2.magrathea-telecom.co.uk/industry_porting/.

Openreach Porting documentation

<http://www.openreach.co.uk/orpg/products/products.do>

5.3 Number Retention

Number-retention is concerned with the “holding” of a telephone number as part of a customer’s home-move request (and connecting to the same network provider at the new address). The telephone number is retained by the network operator and simply assigned to the new service address.

N.B: if a customer is moving outside their serving exchange area then it will not normally be possible to retain their number at their new address.

6 Cancel Other Process

The Cancel Other process is an integral element of the NoT migrations process and was developed to enable a Losing SP (in a migrations scenario) to cancel the Gaining SP’s migration order in strict accordance with the following conditions (GC 24 refers):-

The Losing SP shall only be permitted to use Cancel Other in the following circumstances:

- where Slamming¹ has occurred;
- at the Customer’s request, where the Gaining SP has failed to cancel the request after being directed by the Customer to do so (i.e. ‘Failure to Cancel’);
- where the telephone line is or will be ceased during the Transfer Period (i.e. “Line Cease”);
- for other specified reasons not related to a Customer’s request to cancel a transfer, and agreed by the relevant industry forum and approved by Ofcom;
- in such other circumstances as may be defined by Ofcom.

¹ “**Slamming**” means where a request for CPS, WLR and/or LLU has been made without the Customer’s express knowledge and/or consent; that is in the following circumstances:

(i) where the Customer has never been contacted by the Gaining Service Provider;

(ii) where the Customer has been contacted by the Gaining Service Provider, but has not given the Gaining Service Provider authorisation to transfer some or all of their telephone calls and/or line rental to the Gaining Service Provider;

(iii) where the Customer has agreed to purchase a product or service from the Gaining Service Provider and the Gaining Service Provider has submitted a request for a different product or service which the Customer has not agreed to purchase; or

(iv) where the Customer has agreed to transfer some or all of their telephone calls and/or line rental to the Gaining Service Provider having understood, as a result of a deliberate attempt by the Gaining Service Provider to mislead, that they are making an agreement with a different SP



Before using Cancel Other in cases of Slamming and/or Failure to Cancel, the Losing SP shall take reasonable steps to establish that Slamming and/or Failure to Cancel has actually taken place.

After using Cancel Other, the Losing SP shall confirm the cancellation of the order by Durable Medium to the Customer, unless this is not possible or appropriate, including where the customer is deceased.

The Losing SP shall record its reasons for using Cancel Other in each case, selecting the appropriate reason code from a list corresponding to permitted use of Cancel Other and consistent with GC24.19(m)(i) to (iv), as agreed by the Industry, and approved by Ofcom. (*Appendix C – Cancel Other Reasons & Codes* refers)

Where the Losing SP communicates with the Customer in order to comply with this General Condition, it must not make any marketing statements or representations in the communication which may induce the Customer to terminate their contract with the Gaining SP and/or remain in a contract with the Losing SP

Home moves – the ‘Cancel Other’ process has also been developed as an integral element of the ‘Working Line Takeover’ process. In the event that the occupant at the targeted address declares either of the following:-

- the target address is correct but the house move has fallen through
- they are not moving at all (i.e. wrong address targeted)

there is a cancellation mechanism (i.e. cancel own/other) which enables either the ‘incumbent’ occupant to cancel via their current SP (cancel other) or the ‘moving in’ customer to cancel via their Gaining SP (cancel own).

In the latter circumstances, the correct course of action is for the current SP to submit a ‘Cancel Other’ order to Openreach which will cancel the original WLT order and notify all parties concerned. It is very important that the appropriate Cancel Other Reason Code is used (reason code 9x90 - End User not moving).

If the ‘moving in’ consumer contacts the Gaining SP then the Gaining SP should immediately submit a ‘Cancel Own’ order to cancel the WLT order.

A more detailed guide has been developed to clarify SPs’ responsibilities with regards to the WLT process and, in doing so, reduce the risk of ‘Erroneous transfers’ – (***Appendix B - Working Line Takeover – Best Practice Guide*** - refers)

Jim Reilly
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7 Appendices

Appendix A – Migration & Home Mover Scenarios Matrix

This document provides specific guidance on the 'Best Practice' process for CPs to follow, for every possible End User scenario which can arise.

Appendix B– Working Line Takeover – Best Practice Guide

Appendix C – Cancel Other – Reasons & Codes

Appendix D – Standard Notification Letters

Migrations – Notice of Transfer