

This document aims to provide the basis for discussion of an agreed set of principles to act as a baseline for the development of Best Practice information and supporting processes associated with both the Openreach programme to withdraw WLR and the wider migration to All-IP products across industry; both within and between networks and inter and intra CP.

These principles are aimed at Network Operators, both existing and new, Wholesalers and major CPs.

The expectation is that where there is an extended sales chain, Network Operators and Wholesalers will flow through the requirements and obligations of the principles within their channels to market.

Comments on the draft document should be sent to [peter.ryde@offta.org.uk](mailto:peter.ryde@offta.org.uk) by end January 2021.

Peter Ryde  
OTA2  
07771555048

#### Working with OTA2

Signatories commit to working with OTA2 to track and report, as far as is practical, the success of migration activities and the scale and nature of any failures. Signatories also commit to work with OTA2 and other industry parties to;

- a) seek resolution to any systemic issues that affect vulnerable customers or CNI and
- b) share and communicate best practice across industry, within its organisation and through their channels to market

#### Network Operator and Wholesaler commitment to Ofcom Requirements

Ofcom have referenced their October 2018 guidance re Emergency Calls and 2019 Policy Statement as providing clarity regarding their expectations of industry in terms of supporting vulnerable and CNI customers. While the ultimate responsibility lies with the customer facing CP, Network Operator and Wholesale signatories commit to:

- a) Clearly highlighting and reinforcing these responsibilities in their communication, support material, best practice guides etc. provided to their channels to market
- b) Being clear as to the support they provide to support the customer facing CP to assist with the fulfilment of their obligations e.g.
  - a. Where appropriate working with 3<sup>rd</sup> parties to support compatibility testing of CPE

- b. Supply and/or installation of Battery Back-Up equipment
- c. On roll-back to TDM in the event of an issue affecting a vulnerable customer but subject to reasonable considerations such as prior service (i.e. invalid for FTTP to FTTP migration) and infrastructure availability (i.e. switch closure)
- c) Providing Best Practice Guidance for their channels covering at least:
  - a. CP obligations
  - b. Principles and Behaviour
  - c. Communication with end customer
  - d. Dealing with vulnerable customers, including roll back or mitigation
  - e. Approach to Critical National Infrastructure customers
- d) Ensuring that at any point in the provision/migration journey, an end customer or the supplying CPs have the ability to postpone the migration/order journey and rearrange for a reasonable later date provided this does not jeopardise any previously communicated plans to withdraw the underlying infrastructure. Such reasonable postponement is as to allow time for the resolution of any potential issues that might risk harm to an individual or a business.
- e) Working cross-industry to support a capability for rapid restoration of the former communications service in the case of failure of telecare and other safety-of-life services. Such restoration may be time limited due to the availability of the underlying infrastructure.
- f) Engaging with local and national stakeholders, including CNI organisations, from an early stage to ensure they are aware of any potential implications of a move to All-IP and how to mitigate these.

### Communication

While Network Operators and Wholesalers do not have a direct relationship with the end customer, they should be proactive in seeking to ensure that their channels:

- Understand and acknowledge they have a duty of care to proactively inform their end customers about any potential impact associated with the change to their existing telephony services.
- Residential;
  - Have robust information campaigns to inform customers of the potential impact of the move to All-IP and how they can mitigate these.
  - Maintain BAU procedures for home visits during any intensive migration campaign to avoid the risk of harm to consumers and especially vulnerable customers.
  - Take all reasonable steps to ensure that customers using telecare, other safety-of-life services and textphones do not lose access to those services as a result of migration to All-IP, in particular providing advice and support around the reconnection of those services as part of the installation process. This should include the use of clear scripts to identify whether any person at a premises is vulnerable or at risk from any disruption to their

- communication services including whether any additional equipment utilises the existing PSTN line.
- Where additional equipment, vulnerability or the need for extra support is identified by a CP at the point of sale, Network Operators and Wholesalers should insist that the provision/migration date allows reasonable time for any 3rd party supplier to visit the end customer premises to reconfigure existing equipment, in preparation before the migration of service happens, but which reflects the level of prior notice, severity of impact and flexibility of migration date etc.
  - CPs or Resellers should provide the end customer with clear guidance, next steps and where appropriate the necessary contact information to allow the end customer to undertake any necessary action in a reasonable timescale prior to the provision/migration.
  - Have clear, effective and rapid escalation processes in place to identify and support vulnerable customers impacted by any migration and that these CP processes dovetail with Network Operator/Wholesaler processes so that they function smoothly across the supply chain.
- Business;
    - Business customers will vary in terms of size and complexity but CPs in this market must undertake a structured approach to identifying the business need of the end customer and the potential impact of the move to All-IP on their CPE. This should also include an understanding of the business customers migration requirements “in and out” of normal working hours.
    - CPs, resellers and special service providers are expected to contact their end customers explaining the impacts and migration options for this customer segment, which should be supported by Network Operators and Wholesalers.

### Roll Back

All parties should have dedicated contact points (for industry consumption only) and supporting processes to help resolve any issues affecting vulnerable individuals and CNI where a service has not migrated successfully.

Where there has been a problem with the provision or migration order and it is identified that the end customer has lost connectivity to their specialist equipment, such as health pendants or other safety of life services the signatories should provide clear guidance to their channels on the steps to take to ensure they mitigate any harm.

Signatories will seek to work collaboratively to the best effect to reconnect the customer.

## Ofcom Expectations of Industry

### *October 2018 guidance re Emergency Calls*

In summary:

- Providers should have at least one solution available that enables access to emergency organisations for a minimum of one hour in the event of a power outage in the premises;
- The solution should be suitable for customers' needs and should be offered free of charge to those who are at risk as they are dependent on their landline;
- Providers should i) take steps to identify at risk customers and ii) engage in effective communications to ensure all customers understand the risk and eligibility criteria and can request the protection solution; and
- Providers should have a process to ensure that customers who move to a new house or whose circumstances change in some other way are aware of the risk and protection solution available.

### *Ofcom 2019 Policy Statement*

Some customers, particularly those who are elderly, need a new broadband connection or have accessibility or disability requirements, may need additional support during the change.

As the migration progresses and more customers are transitioned to VoIP services, we anticipate that consumer bodies will have a role to play in helping to disseminate information about the change and provide advice to consumers regarding the steps they need to take and support they will be offered if they are migrated.

Communications Providers should engage with key downstream service providers to help them understand and prepare for the change to ensure the transition is as smooth as possible and to mitigate the risk of any consumer harm as the move to VoIP may be more complex for consumers that have downstream services such as telecare devices and security alarms that rely on the PSTN. In addition, some customers, such as landline-only customers, or those with a visual impairment or mobility issue, may require support from their provider when installing or using new equipment.

### CP responsibility regarding Downstream services

- Share knowledge of the key downstream services impacted by the migration and examples of good practice/successful communication strategies
- Develop a strategy to identify and engage with downstream service providers that utilise their landline services, in a timely fashion, to ensure they are aware of the change and the potential implications;

- Where relevant, make downstream service providers aware of any available testing facilities or facilitate access to the facilities offered by access network providers, so they can determine whether their services will work effectively over an IP network;
- Identify customers who use critical downstream services (such as a telecare device), develop appropriate communications plans and put in extra protection measures. For example, this could include delaying a customer's migration until satisfied that their downstream service is compatible with VoIP;
- Develop effective processes to support customers who inform them that their downstream services do not function as planned after migration. This could include returning them to a PSTN service if it remains available where the failure creates a risk of significant harm.

CP responsibility for supporting migrating customers:

- Give adequate notice of service changes, noting that both residential and business customers may need time to acquire and configure new equipment;
- Ensure that all communications regarding the migration are clear and timely, in a format that reflects the needs of the customer, and include information about the potential impact on equipment that uses the PSTN;
- Assess customers' needs and offer help with migration (for example, a home visit to install a router) if necessary;
- Offer advice and assistance for all migrating customers, including those who use downstream services, and co-operate with providers of these services, to minimise disruption;
- Put ongoing protections in place to respond appropriately to later changes in end-users' circumstances, for example, customers that migrate to a VoIP service and then purchase a security alarm or telecare device.