Trial Best practice guide

WLR Withdrawal – Trial sites Salisbury and Mildenhall

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Change Control

Version	Change made:	Created/changed by:	Date:
Draft	Initial draft for industry review and comment	Andy Wright / David Halliday	07/2/2020
Issue 1	Document issued with clarifications and eROC process added	Andy Wight	25/08/2020
Issue 2	Added scenarios to the exception process see section 7.1	Andy Wright	02/09/2020
Issue 2	Document issued on the OTA2 website	Andy Wright	23/09/2020

Change Control

1 Contents

2 Introduction

This document aims to provide 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.

This best practice has been written by Openreach and the OTA2 with input from CPs and interested industry stakeholders.

The objective of the principles is to ensure the protection of the consumer and to minimise CP and end customer disruption, especially to Vulnerable end customers and Critical National Infrastructure. The principles seek to ensure, as far as is practical, service continuity and that customers are not left without a working service or suffer a material impact to critical or life affecting services which rely upon the underlying telecoms product(s).

These principles (see Annex A) aim to support the Ofcom statements referenced in their October 2018 guidance re Emergency Calls and 2019 Policy Statements, where they have provided clarity regarding their expectations of industry in terms of supporting vulnerable and CNI customers. It is recognised however the ultimate responsibility lies with the customer facing CP, Network Operator and Wholesale signatories committing 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 to assist with the fulfilment of their obligations e.g.
    a. Where appropriate working with 3rd parties to support compatibility testing of CPE
    b. Supply and/or installation of Battery Back- Up equipment
    c. Restoration of service in the event of an issue affecting a vulnerable customer
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 restoration of service or mitigation
    e. Approach to Critical Network Infrastructure customers
d) Ensuring that at any point in the provision/migration journey that an end customer or the supplying CPs have the ability to postpone the migration/order journey and rearrange for a later date so 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 ensure the capability and accountability for rapid restoration of former communications services in the case of failure of telecare, other safety-of-life services or textphones.
f) Engaging with local and national stakeholders, including CNI organisations, from an early stage to ensure they are aware of the any the potential implications of a move to All-IP and how to mitigate these

This guide provides industry stakeholders with a view of the best practices initially to be applied during the WLR withdrawal trial exchanges in Salisbury and Mildenhall. 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.

As we enter into the closure of PSTN we have an opportunity to continually develop this guide which will be used to assist with national closure of the PSTN, where other stop sell restrictions have been implemented, coupled with embracing the new fibre technologies available.

The trials are critical to the success of the national withdrawal of WLR. This document will provide the foundation and baseline for any best practice guide that is implemented to support the national WLR withdrawal programme.

Openreach will report on good practice throughout the trial periods identifying what has gone well and not so well, the different edge cases, and case studies that required additional support, so all the key learning is captured, documented and addressed in preparation for the national stop sell in September 2023.

There is no option to opt out of the trials, if you have a working WLR or MPF assets in one of the locations you will be impacted by the stop principles / rules with the expectation that the existing bases will be migrated to an all IP alternative products by the end of the trials in December 2022.

The difference between the trials and normal business as usual migrations is the additional focus, tracking and attention, which provides the opportunity to learn, improve and where necessary, explore the use of different practices / solutions to quickly overcome different challenges.

In preparation CPs need to engage with Openreach to plan their migrations, making sure they are also ready with their own communication plan and have consumed either directly or via a wholesaler of their choice the alternative products shown below before the trials complete in December 2022.

Openreach is developing a suite of All IP products that will enable the future of the UK's superfast and ultrafast networks
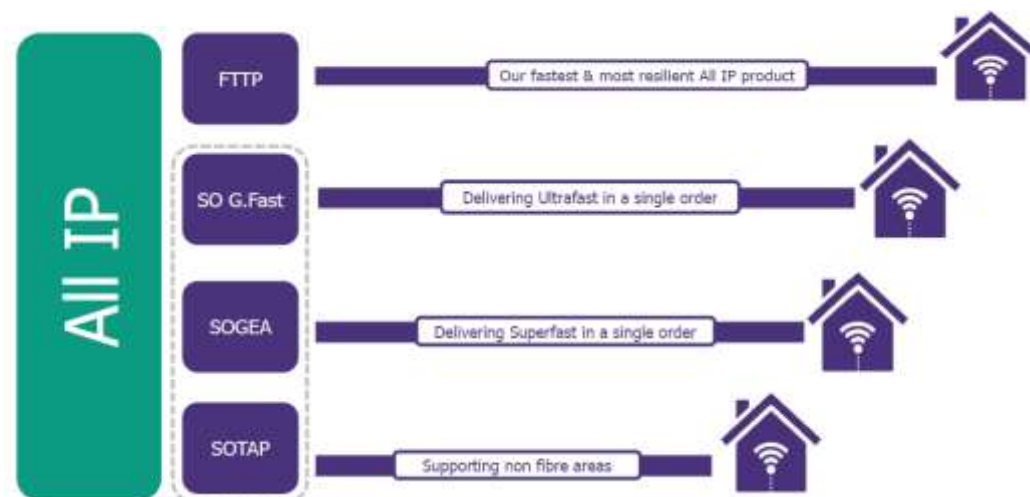
Annex A: details the simplified Openreach portfolio to assist with migration planning.

Openreach will monitor and report on the trial progress, this report will include:

- Compliance to best practice working closely with the OTA2

    a) seek resolution to any systemic issues that affect vulnerable customers or CNI
    b) share and communicate best practice across industry, within its organisation and through their channels to market
- Migration updates
- Key issues and learning
- Edge cases and updated process / procedures
- CP engagement

This document outlines the key principles and behaviours expected to support the migration of lines from copper technology to the future all IP products, with specific focus given to the different market segments for residential and business type customers.

The document provides guidance for all parties which include Openreach, CPs and third party suppliers; with specific focus on, the point of sale key principles, on the day migration key activities and options post the migration if things haven't gone quite to plan.

The best practice guidance is there for industry; Openreach, CPs, CP resellers, special service providers and industry groups, to work together, making sure the best possible experience is provided to the end customer. The objective is to maintain where practically possible continuity of service, provide consumer protection by not knowingly leaving anyone without a working service.

It is however recognised that there will be a number of edge cases identified during the trials that will be captured and worked through to resolution.

The OTA2 will work closely with Openreach, CPs and industry stakeholders to capture and review any feedback and learning throughout the trials.

3   Terms of reference

End customer	The customer receiving the service or services at their premises from the communication or special service provider.
Communication provider (CP)	CP or reseller supplying a service to their end customer.
Special service provider	A supplier providing an additional over the top service to the end customer's service e.g. health pendant, alarm services etc.
Business customers	Where services are supplied to the businesses customer segment.
Residential customers	Where services are supplied to the consumer market segment.
Self-install	The end customer or their representative to complete the onsite installation. No Openreach engineer is planned to visit the end customer premises.
Managed install	When an Openreach engineer visit is required to the customer's premises to complete work up to the main installation socket.
Premium install	When an Openreach engineer visit is required to the end customer's premises and the end customer wants additional equipment reconnected beyond the main socket.
Industry groups	Industry organisations such as the water board or electricity companies, who do not supply a telephony service direct to end customers but consume a service to manage their customer segment.
WLR and MPF migrations	CP analogue services moving to a fibre alternative solution
Restoration of service	The process to be used to restore / re-provide an analogue service. This is sometimes referred to as "roll back"

Voluntary migrations can commence at any time during the trials with CPs placing the relevant migration orders as appropriate. Openreach has notified a commercial offer which commenced on 3 February 2020 to assist CPs during the voluntary phase of migrations for their PSTN lines.

Key Dates:

Trial start date general briefing GEN 103/19 refers: 6 January 2020

Stop Sell general briefing GEN 104/19 refers: Salisbury December 2020 and Mildenhall May 2021.

The stop sell rules in Salisbury will include more than just the WLR and MPF products. The intention is to also restrict, GEA-FTTC, SOGEA, SOGFAST, GFAST where a premise is covered by FTTP. There will also be further order restrictions to prevent modifications within the existing product sets, for example restricting speed upgrades within the same product.

The aim of the trials is to migrate WLR and MPF products by December 2022 where possible:

- Salisbury to migrate all copper based solutions (SOGEA, WLR and MPF lines) to GEA – FTTP or alternative fibre solutions where the premises have been enabled for the fibre service. Copper based order restrictions will only be applied if the premise has been enabled for the new target product (see tables in section 7 for more details).

- Mildenhall to migrate all WLR and MPF lines to fibre alternatives inside the fibre footprint and WLR lines to SOTAP or alternative products outside the fibre footprint. SOTAP and MPF will be available in a fibre area if there is no fibre spare capacity.

It is recognised during the trials that there will be a number of edge case scenarios that will require additional support. These will be worked through and reported on, on a case by case basis.

Openreach intends to appoint dedicated trial and migration managers to support CPs and industry stakeholders. It is intended where possible that CPs and other industry groups should also have dedicated points of contact for both trial sites; this will be used as the first point of contact in all instances for advanced planning and day to day issue resolution.

Openreach aims to have clear processes and guidance for engineers to follow for their order journeys for the trial sites. The objective is to provide the engineer with clear guidance and best practice during end customer visits to minimise any end customer disruption.

Order placement; it is recognised that where possible migration journeys will be used to migrate end customers to the new product variants, thus avoiding unnecessary new copper line plant being provided. The use of the appropriate migration journey is also required to qualify for the commercial PSTN offer. CPs who haven't consumed the appropriate order journey will need to reactively claim the discount by contacting their business manager.

End customer disruption should be kept to a minimum. CPs, CP resellers, special service providers and industry groups should work together to improve the point of sale experience for their end customers by identifying:

a. before or at the point of sale (where possible) lines that have special services or devices connected to PSTN the line
b. end customers who are deemed to be vulnerable and require additional support through the migration experience
c. lines that are used to supply services for CNI
d. businesses requiring additional support (including out of normal hours work)

The objective is to make sure any information is shared with the relevant parties / suppliers, provided that the correct customer permissions have been obtained to allow pre-checks, for the upgrade of any equipment to make it IP compatible, in advance of the migration experience. This practice will ensure that the associated order journeys can be as smooth as possible for the end customer.

Where lines have not been identified at the point of sale with additional services, Openreach will provide clear guidance to the engineering teams on how to manage the on the day issues (see section 4.2).

4 General principles and behaviour

Given the different number of CPs, potential resellers and special service providers that could be involved in supplying the existing service, even the simplest of migrations can become complex. There are a number of different lines configurations that need to be considered.

Historically we have always prioritised the voice for the purposes of establishing a bearer before providing broadband. In the IP and single order world this is reversed, thus potentially changing the dialogue at the point of sale.

This complexity is highlighted both in the diagram and table below. The embedded spreadsheet also provides additional information highlighting further complexity around the many different order scenarios that can occur when moving from copper to SOGEA products.

All parties should agree to the overall communication trial time line (see section 5).

There will be regular reviews with Openreach, industry and the OTA2 to report on the best practice principles throughout the trial.
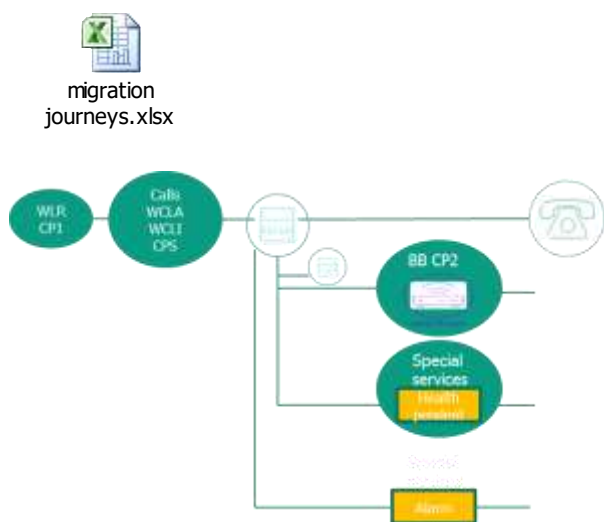
migration
journeys.xlsx

Before	On the day	After
CP – Point of sale principles	Specific engineering instructions	Roll back / restoration process
Pre testing	What happens if...	
commercials		
Consider migration options – Consumer / Business, target products, out of hours		
Finalise communication principles		

4.1   Point of sale principles – protecting the end customer (making sure they are protected and not cut off)

In order to minimise any customer disruption during any migration phase of the two trials in Salisbury and Mildenhall, which could be voluntary, planned or forced, it is really important that we all adhere to a clear set of point of sale principles.

When things don't go quite to plan on the day, the Openreach business, trial or migration manager(s) can be contacted over and above the normal BAU process to assist with resolving the reported issue.

It is the responsibility of each CP, CP resellers and industry groups to develop their own scripts to meet the ley principles listed below.

Openreach will work with all parties throughout the trial period to continually review and enhance the scripts to address any additions or process improvements to the issues identified (for additional information please refer to sections 4.3 and 4.4).

These are:

- To make sure all parties are to act with integrity, providing clear communications at the appropriate time with all parties.
- Should follow a dedicated script to be used with residential (consumer) customers to identify the appropriate lead time and any additional equipment that is working on the existing PSTN line.
- Should follow a dedicated script to be used with business customers to identify the business need for the end customer; the appropriate lead time whilst understanding the line mapping requirements and the potential impacts on their end customer equipment.
- CPs, CP resellers, special service providers and industry groups have a duty of care to proactively identify lines that have additional services using the PSTN.
    - All parties be willing to work closely together and share information as required
    - It is expected that all parties should make information available to the end customers about the service they supply and how it will operate in the new IP world in advance of any migration order being placed.
    - CPs and resellers to preform pre order compatibility checks with end customers / third party suppliers.
- All parties should have dedicated point of contact to help with issue resolution throughout the migration process.
- In advance of any visit or migration taking place, the CP should understand the impacts on end customer equipment (CPE).
- All parties to have a clear understanding of end customers migration requirements "in and out" of normal working hours.
- Regular review sessions with the OTA2

4.2   Compatibility check – how can I be sure things will work

CPs, CP resellers, special service providers and industry groups have a duty of care to proactively inform their end customers about the planned change to their existing telephony services.

The bullet points below indicate the key steps that are expected form all parties to make sure the end customer has the best possible experience during the migration order journey / engineering activity.

- This information should provide clear end customer guidance; advising the next steps, what additional activities are required, the appropriate longer lead times if required in advance of any migration activity.
- The supplied information should provide the end customer with clear guidance, next steps and contact information to allow the end customer to find additional information out easily prior to the migration orders being fulfilled.
- The information pack must also contain information which includes an escalation point of contact to help the end customer resolve any issues that result in the migration not going quite as planned.
- The Openreach engineer will follow the guidance highlighted in the flow charts below to make sure where possible, nothing is disconnected or left not working where possible.

Diagram 1 shows the Openreach engineering experience for the end customer when things stay on track
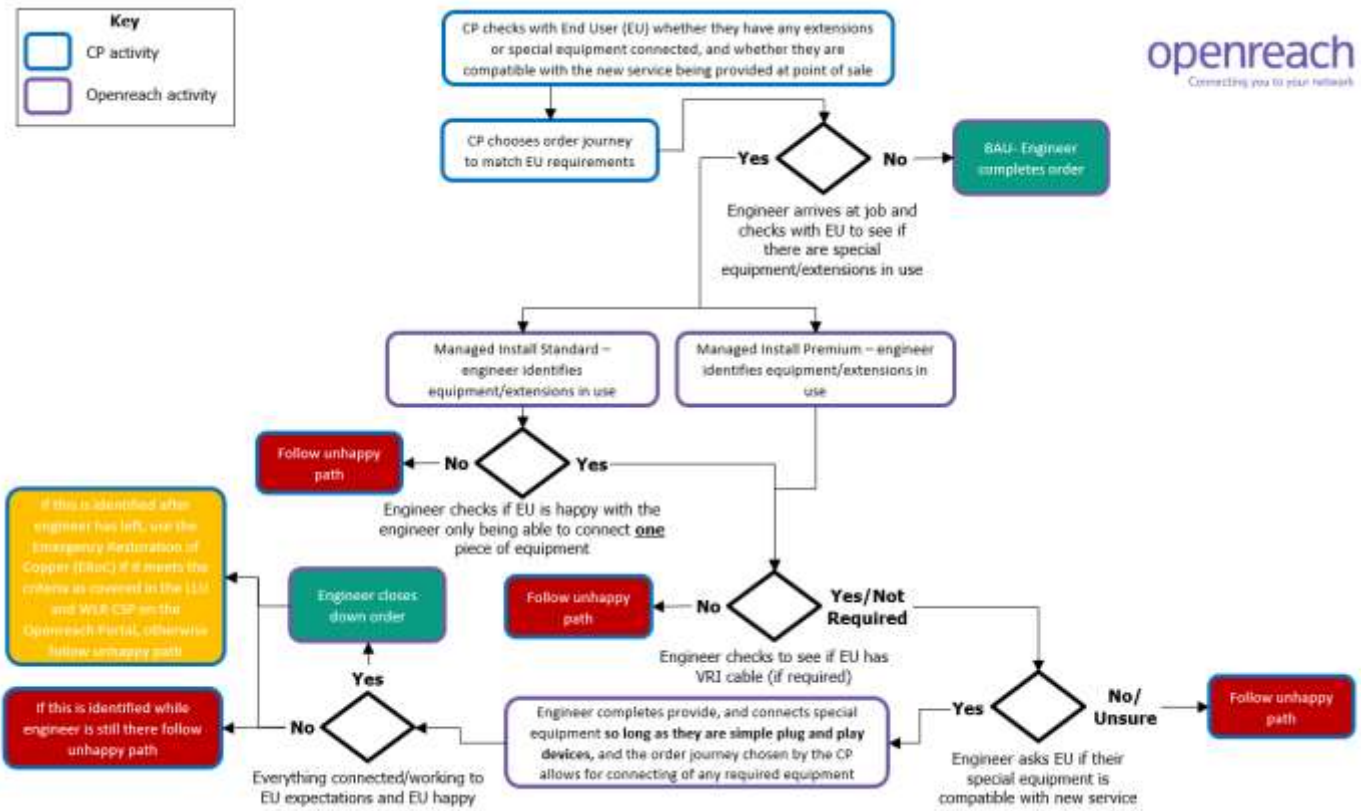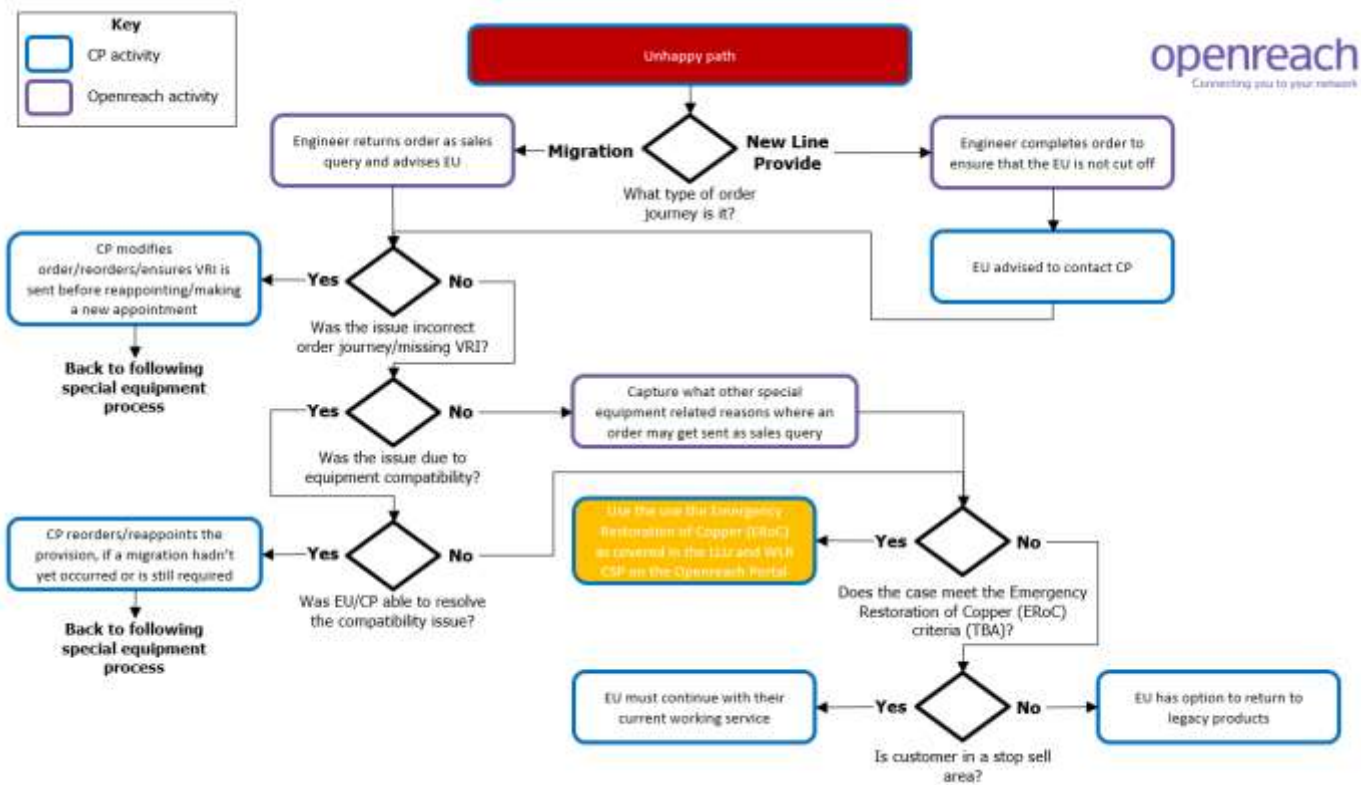
Diagram 1

CP checks with End User (EU) whether they have any extensions or special equipment connected, and whether they are compatible with the new service being provided at point of sale

CP chooses order journey to match EU requirements

Yes / No

BAU- Engineer completes order

Engineer arrives at job and checks with EU to see if there are special equipment/extensions in use

Managed Install Standard – engineer identifies equipment/extensions in use

Managed Install Premium – engineer identifies equipment/extensions in use

Follow unhappy path

No / Yes

Engineer checks if EU is happy with the engineer only being able to connect **one** piece of equipment

If this is identified after engineer has left, use the Emergency Restoration of Copper (ERoC) if it meets the criteria as covered in the LLU and WLR CSP on the Openreach Portal, otherwise follow unhappy path

If this is identified while engineer is still there follow unhappy path

Engineer closes down order

Follow unhappy path

No / Yes/Not Required

Engineer checks to see if EU has VRI cable (if required)

Yes

No

Everything connected/working to EU expectations and EU happy

Engineer completes provide, and connects special equipment **so long as they are simple plug and play devices**, and the order journey chosen by the CP allows for connecting of any required equipment

Yes / No/Unsure

Follow unhappy path

Engineer asks EU if their special equipment is compatible with new service

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Diagram 2 shows the Openreach engineering experience for the end customer when things haven't quite done to plan

Diagram 2

Unhappy path

Engineer returns order as sales query and advises EU

Migration / New Line Provide

Engineer completes order to ensure that the EU is not cut off

What type of order journey is it?

EU advised to contact CP

CP modifies order/reorders/ensures VRI is sent before reappointing/making a new appointment

Yes / No

Was the issue incorrect order journey/missing VRI?

Back to following special equipment process

Yes / No

Was the issue due to equipment compatibility?

Capture what other special equipment related reasons where an order may get sent as sales query

CP reorders/reappoints the provision, if a migration hadn't yet occurred or is still required

Yes / No

Was EU/CP able to resolve the compatibility issue?

Back to following special equipment process

Use the use the Emergency Restoration of Copper (ERoC) as covered in the LLU and WLR CSP on the Openreach Portal

Yes / No

Does the case meet the Emergency Restoration of Copper (ERoC) criteria (TBA)?

EU must continue with their current working service

Yes / No

Is customer in a stop sell area?

EU has option to return to legacy products

4.3   Residential customers

It is really important the CP understands the residential customer requirements and line configuration; by identifying any additional third party equipment that may be plugged into the existing service before any migration order is placed.

To help with this process it is highly recommended that the CP should cover a number of key questions at the point of sale. The key areas are indicated in the four boxes below:

Identify customers who want to retain their phone numbers and have extensions in their property they wish to retain

Identify the correct order journey experience: Self, managed or premium install to support the end customer migration needs

Understand if a customer has any critical services e.g. health care/alarm devices plugged into their phone line

Advise in advance the customer to contact their device provider to ensure it is broadband/VoIP compatible and that they have a local power supply available

The CP in response to these structured questions should then be able to place any migration request using the most appropriate order journey to support their end customer needs.

The end customer or their representative should also be aware, following any point of sale experience with their CP, of their individual responsibility to contact any organisation supplying 3rd party equipment currently working on their copper line, in advance of any migration taking place.

Failure to retain (where required) and porting the telephone number during the migration will result in the telephone number being ceased which could cause the end customer distress.

The CPs should also make their customers aware of the local power supply requirements that will needed once the migration has taken place.

Migration orders should be placed with an appropriate lead time, allowing 3rd party suppliers enough time to react and make any necessary arrangements to test or replace equipment currently working on the copper line.

4.4   Business customers

It is really important the CP understands the business requirements of their end customer before any migration orders are placed.

To help with this process it is highly recommended that the CP should cover a number of key questions at the point of sale. The key areas are indicated in the four boxes below:

Identify the business needs of the customer

Identify the correct order journey experience: Self, managed or premium install to support the end customer migration needs

Understand the line configuration and what equipment is connected to each of the lines

Advise in advance the customer to contact their switch or other equipment provider to ensure it is broadband/VoIP compatible

It is recognised that the existing copper line and switch configuration to each business customer can be very complex.

Therefore before any migration activity / orders are placed, it is important that all parties supplying a service to make up the complex installation should be fully briefed and aware of the migration plan.

The CP in response should then be able to place any migration request using the most appropriate order journey to support their end customer needs. This process should allow the appropriate lead time for all equipment suppliers to make the necessary onsite reconfiguration, replacement of existing equipment and complete compatibility testing before migrating to an alternative technology.

The CP placing the migration order should seek confirmation from the end customer that all parties have been contacted and understand any migration order journey impacts as part of the order placement process.

4.5   Order journeys and network capacity

It is important that the CPs managing the end customer migration places the appropriate migration order journey. This will make the migration journey as smooth as possible whilst avoiding where practically possible the unnecessary provision of any new copper thus minimising / avoiding any network capacity issues.

As part of the migration planning, it is important for CPs and CP resellers to identify premises with multiple copper lines and the required mapping to the new product sets. This information will provide early visibility to the CP, CP resellers and Openreach of any potential network capacity issues thus allowing all parties to plan appropriate migration activities.

CPs should also recognise from their point of sale questioning, the end customer requirements and support any order journey with the appropriate installation journey of self-install, managed install or premium install.

4.6   Customer Premises Equipment (CPE) rules and principles

The commercial arrangement for managing CPE compatibility, testing or replacement equipment is direct between the CP supplying the equipment and the end customer.

Extension socket wiring beyond the NTE has historically been integral to WLR installations. This is typically used in residential and some business installations where additional telephones or services are required on the line. CPs should beware of the importance trying to identify installations and make the necessary arrangements where they exist to make sure they are reconnected where necessary or consciously disconnected if they are no longer required.

During any migration order journey, the CP or special service provider supplying the end customer equipment is responsible for identifying, testing where applicable to confirm compatibility with the new service or for supplying new equipment where it is deemed necessary to make sure the customer remains connected.

4.7   Out of hours work

At the point of sale if any work is identified which is required out of normal working hours, the appropriate order and appointment should be placed through the EMP system or the BAU exception process. If a flexible

appointment is required this can be booked at the point of sale (where no appointments are available the BAU escalation should be followed as per the customer service plan).

4.8   Double migrations

CPs are encouraged to work closely with Openreach and specifically the trial managers to minimise where possible any double migrations of end customers. Where the preferred target product is not available at the point of sale, it is worth seeking clarification via the Openreach eMLC dialogue service, which will indicate where FTTP is planned or expected RFS (ready for service) date, before placing an order for an alternative product, thus avoiding additional cost and end customer disruption.

5   Communication

5.1   What's expected from the CP

It is recognised by industry that CPs, CP resellers, special service suppliers and industry groups have a duty of care to proactively inform their customers of the trials and what that means in reality to them.

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

- 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.

It is expected that all CPs and industry groups will contact their own customers with clear messaging that covers the key points highlighted below. It is recommended that this has been completed in the trial sites no later than June 2020 to avoid where possible any end customer confusion or miss understanding.

Key message themes that need to communicated at the appropriate time to all stakeholders:

1. The impacts of the trials
2. The trial timeline and the objective to migrate their existing service by December 2022
3. What stop sell means for them and the impacts on their existing equipment
4. What their end customers options are
5. How the migrations journeys will work and the point of sale experiences

6   Lines with special services

CPs, CP resellers, special service providers and industry groups all have a responsibility for identifying and contacting their end customers who they deem to have lines that are being used to support any specialist equipment.

Ofcom have stated that Openreach and telecoms providers should:

1. 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, in particular providing advice and support around the reconnection of those services as part of the installation process.

2. Provide for the rapid restoration of former communications services in the case of failure of telecare, other safety-of-life services or textphones.

3. Have robust information campaigns and security procedures for home visits to avoid the risk of harm to consumers.

4. Engage with local stakeholders at an early stage to ensure they are aware of the change and the potential implications.

6.1 Vulnerable customers

Where an end customer has been identified with special requirements, ultimately the supplier of that equipment is responsible for making sure the end customer remains connected after any migration has taken place.

In order to achieve this however, all parties have a duty of care to proactively identify such lines.

All end customers in the trial areas should be contacted by their suppliers providing clear instructions for the end customer or their representative, with clear guidance of what to do and who to contact prior to any line migration activity which is taking place.

Where a CP is planning to migrate one of their existing customers which could normally be done in a short lead time, but additional equipment / support has been identified at the point of sale, it is recommended that any migration order(s) is placed with a longer lead time (suggested a minimum of 10 working days).

This should allow sufficient time in cases where any additional equipment or a 3rd party supplier is required to visit the end customer premises to reconfigure existing equipment in preparation before the migration of service happens.

At any point of the migration journey the end customer or the supplying CPs have the ability to postpone the migration order journey and rearrange for a later date.

In the case where the Openreach engineer arrives at the customer premises and recognises that either there is a potential problem with the planned migration, or that the end customer is unaware of the planned migration journey, the order will be delayed under the existing sales query process and deferred back to the owning CP to discuss the issue with their end customer in more detail.

Where there has been a problem with the migration order and it is identified that the end customer has lost connectivity to their specialist equipment, such as heath pendants or alarm services there is an option to roll back or for critical/chronic health devices, use the Emergency Restoration of Copper process (section 6.3.1) to reconnect the existing service whilst the issue is further investigated allowing time for the connectivity problem to be resolved. (Please refer to section 6.3)

6.2 Critical National Infrastructure (CNI)

Openreach is proactively working with the CNI organisations to raise awareness of the WLR withdrawal programme trial and national timelines.

CPs, CP resellers, special service providers and industry groups are also expected to contact their end customers explaining the impacts and migration options for this customer segment.

It is expected that lines in this customer segment will migrate during the trial period to alternative all IP products (as these lines need to be fully migrated as the PSTN is closed in 2025), however it is recognised by exception that there will be specific short term additional challenges with services supplied by this customer segment, given some of the additional complexity of the installation types and customer premises served. Where an issue is identified that could potentially prevent a planned migration taking place (in the trial timelines) the providing CP should discuss their concerns with the Openreach migration planning team, who will conduct a review on a case by case basis.

These migrations will form part of the key learning required to support the national programme and WLR withdrawal by 2025.

6.3   Restoration of service – what happens when it goes wrong

All parties should have dedicated contact points and supporting processes to help resolve any issues affecting vulnerable individuals and CNI where a service has not migrated or have not been provisioned 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 heath pendants or alarm services the signatories should provide clear guidance to their channels on the steps to take to ensure the mitigate any harm.

In this scenario the following steps should be followed:

1. Where the provision or migration order(s) have not gone according to plan, a collaborative approach to the best effect will be used to reconnect the customer.
2. Where a restoration back to copper is required, it is expected that the CP will place the relevant new order(s) required to support the reconnection of the line.
3. If the problem is recognised before the migration order has closed and KCI3 has not been triggered, then a roll back to the original service can be triggered to reinstate the existing copper service.

Section 4.2 refers to the on the day process that the Openreach engineers will apply. This section also mentions the emergency restoration of copper process for certain scenarios, which is covered below in section 6.3.1.

6.3.1 Emergency Restoration of Copper (ERoC)

ERoC has been created specifically for situations where a critical or chronic health device stops working after a migration to an All IP product, and this process is documented in the WLR and LLU CSP, in the Openreach portal. The process will support CPs in expediting the provision of the copper order to the best available date that Openreach can offer.

As well as meeting the criteria for ERoC covered in the CSP, it is expected that CPs will also be following the principles set out in this best practice guide. Hence volumes for this process are expected to be very small, and any increase in volume may result in restricted access for individual CPs, or in extreme circumstances temporary withdrawal of the process.

7 Stop sell rules – key principles for each trial site

A summary of the stop sell key principles and order restrictions for each trial site is shown below. Product restrictions will only be applied to premises in the trial areas where alternative products are available as defined below. Product restriction flags will be visible to assist CPs at the point of sale through eMLC, address matching (get address and address match) and manage line plant availability dialogue services. The screen shots in Annex B indicate how these flags will be displayed.

The stop sell order restrictions will be applied for Salisbury in December 2020 and Mildenhall in May 2021.

Please note:

1. SOTAP will be available once launched for industry consumption. Until the product is available WLR will not be restricted in that order scenario until September 2023.
2. WLR restricts PSTN, ISDN2 and ISDN30 order journeys

Salisbury and any additional FTTP priority exchanges stop sell flag and policy

Stop Sell Policy and Product Scope

- Stop sell applies at a premises level only where that premises has access to an available GEA-FTTP product
- Where a premises has access GEA-FTTP no new supply of other products, CP transfers, working line takeovers, addition of broadband to voice lines, bandwidth modify, start of stopped lines or migrations to non Ultrafast products
- If a premises has GEA-FTTP available to order then only GEA-FTTP is available and as premises get availability post stop sell they will come within scope of stop sell immediately
- If a premises does not have GEA-FTTP available, SOGFAST, SOGEA, GEA-FTTC, SOTAP, (where no fibre available), MPF and WLR (until September 2023) will be available
- Consideration will also be given to investment policies in the copper network which could include VDSL cabinet capacity and repairs of the copper network

	FTTP priority exchange - Stop Sell Policy						
	Salisbury and any additional FTTP stop sell exchanges						
FTTP	SOG.Fast	SOGEA	FTTC	MPF	SMPF (until Sept 2023)	SOTAP	WLR (Until Sep 2023)
✓	✗	✗	✗	✗	✗	✗	✗
✗	✓	✓	✓	✓	✓	✗	✓
✗	✗	✓	✓	✓	✓	✗	✓
✗	✗	✗	✗	✓	✓	✓	✓

Order restrictions applied and validated per address key to see if serving technology is available at that premise

Mildehall stop sell flag and policy

Stop Sell Policy and Product Scope

- Stop sell applies at a premises level only where that premises has access to an available GEA-FTTP, SOG.Fast or SOGEA product
- Mildenhall trial exchange:
    - Where a premises has access to GEA-FTTP ,SOG.Fast or SOGEA no new supply of other products, CP transfers, working line takeovers, addition of broadband to voice lines, bandwidth modify, start of stopped lines or migrations to non Ultrafast products
    - If a premises does not have access to GEA-FTTP ,SOG.Fast or SOGEA ; MPF and SOTAP will then be available for new supply which incld CP transfers, working line takeovers and start of stopped lines
    - If premises get availability for GEA-FTTP , SOG.Fast or SOGEA post stop sell they will come within scope of stop sell immediately
- Consideration will also be given to investment policies in the copper network which could include VDSL cabinet capacity and repairs of the copper network

WLR withdrawal exchange - Stop Sell Policy for the trial site							
Mildenhall							
FTTP	SOG.Fast	SOGEA	FTTC	MPF	SMPF	SOTAP	WLR
✓	✓	✓	✗	✗	✗	✗	✗
✗	✓	✓	✗	✗	✗	✗	✗
✗	✗	✓	✗	✗	✗	✗	✗
✗	✗	✗	✗	✓	✗	✓	✗

Order restrictions applied and validated per address key to see if serving technology is available at that premise

7.1   Exception process

Openreach recognises that customers will be using existing products to provide national security, public safety and business critical services.

During the pre-sell discussion relating to new provision of service and the event of an end customer raising a concern with their CP or a CP having concerns relating to incompatibilities post stop sell implementation, between the Openreach and CP or 3$^{rd.}$ party products. Sections 4.3 and 4.4 offer guidance on the relevant checks to be performed

We may consider an exception request on a per line basis only where all avenues have been exhausted i.e. best practice guide has been followed, all checks performed for use of alternative end user technology.

Requests for exception will be considered only under the following scenarios although exceptions are not guaranteed to be granted with each being assessed on its individual merits.
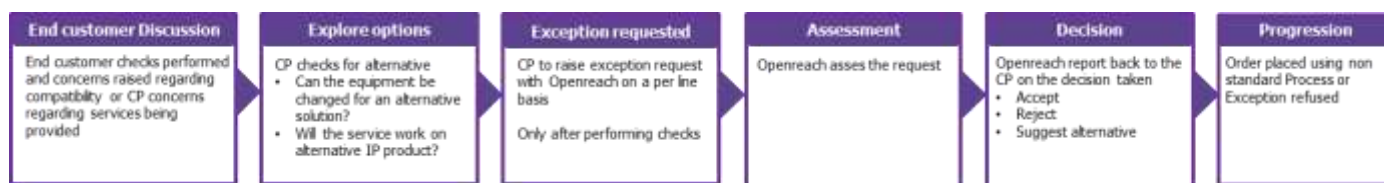
- Openreach is unable to provide FTTP to the required address for FTTP upgrade exchange areas or where Openreach is unable to provide FTTP, SOGFAST, SOGEA, SOTAP, FTTC or MPF to the required address for WLR withdrawal exchange areas

- No Openreach product exists that is suitable for the required address at the time of order placement e.g. Ships in dock or Temporary structures

Or there are known incompatibilities between the available Openreach product(s) and CP or a 3$^{rd.}$ party product including public safety or welfare

Exception process should only be used following all other options being exhausted

- Have checks been performed with the end customer regarding the criticality of equipment?

- Can the equipment be changed for an alternative solution?

- Will the service work on alternative IP product? (Only applicable for WLR Withdrawal exchanges)

Where the copper products have not been restricted under the Stop Sell policy post stop sell. An exception is not required

End customer Discussion	Explore options	Exception requested	Assessment	Decision	Progression
End customer checks performed and concerns raised regarding compatibility or CP concerns regarding services being provided	CP checks for alternative • Can the equipment be changed for an alternative solution? • Will the service work on alternative IP product?	CP to raise exception request with Openreach on a per line basis Only after performing checks	Openreach asses the request	Openreach report back to the CP on the decision taken • Accept • Reject • Suggest alternative	Order placed using non standard Process or Exception refused

Where Openreach are able to provide either FTTP, SOGFAST, SOGEA, SOTAP, FTTC or MPF to the premises the exception will be valid up to 12 Months after stop sell implementation. Dependant on proximity to WLR withdrawal date.

Where Openreach are unable to provide; FTTP, SOGFAST, SOGEA or SOTAP or no Openreach product exists the exception will remain valid until such time as the existing serving technology is withdrawn or until Openreach are able to provide a solution. Whichever comes first.

Exceptions matrix. Effective from stop sell implementation

New supply at time of order placement for WLR withdrawal exchange

Scenario	Stop Sell Implementation 2021 +	Migration period T – 24 Months	Focussed Migration T – 12 Months	Withdrawal T – 6 Months	Post Withdrawal
Openreach is unable to provide an FTTP, SOGFAST, SOGEA, SOTAP, FTTC or MPF product to the required address (Gold address)	Subject to criteria	Subject to criteria	x	x	x
No Openreach product exists that is suitable for the required address (Non Standard address) Includes Hot Sites, Non Served Premises	Subject to criteria	Subject to criteria	x	x	x
CP Readiness e.g. not consuming Openreach FTTP, SOGFAST, SOGEA, SOTAP, FTTC or MPF product(s) For standard address types (excluding those premise types where Openreach does not offer a suitable alternate solution)	x	x	x	x	x
End customer readiness e.g. choose not to buy/replace equipment where the existing equipment is not compatible	Subject to criteria	Subject to criteria	x	x	x
End customer or CP timing e.g. will buy/replace but not until a later date. CP consumes product and timing relates to CPE or Service only	Subject to criteria	Subject to criteria	x	x	x
Exchange only lines	✓	✓	x	x	x

Exceptions matrix. Effective from stop sell implementation

New supply at time of order placement for FTTP upgrade exchange

Scenario	Stop Sell Implementation	Migration period T – 24 Months	Focussed Migration T – 12 Months	Withdrawal T – 6 Months	Post Withdrawal
Openreach is unable to provide an FTTP product to the required address (Gold address)	Stop Sell Policy applies (WLR until 2023)	Stop Sell Policy applies (WLR until 2023)	x	x	x
No Openreach product exists that is suitable for the required address (Non Standard address) Includes Hot Sites, Non Served Premises	Stop Sell Policy applies only if product becomes available	Stop Sell Policy applies only if product becomes available	x	x	x
CP Readiness e.g. not consuming FTTP and FTTP is available to the premises. For standard address types (excluding those premise types where Openreach does not offer a suitable alternate solution)	x	x	x	x	x
End customer readiness e.g. choose not to buy/replace equipment where the existing equipment is not compatible	Subject to criteria	Subject to criteria	x	x	x
End customer or CP timing e.g. will buy/replace but not until a later date. CP consumes FTTP and timing relates to CPE or Service only	Subject to criteria	Subject to criteria	x	x	x
Exchange only lines	✓	✓	x	x	x

Exceptions matrix. Effective from stop sell implementation

Technology change of existing customer base

Scenario	Post Stop Sell Implementation	Migration period	Focussed Migration	Withdrawal T - 6 Months	Post Withdrawal
Openreach is unable to provide either a FTTP, SOGFAST, SOGEA, SOTAP, FTTC or MPF product to the required address (Gold address)	CP choice to migrate	CP choice to migrate	CP choice to migrate	– 6 Months / x Post	x
No Openreach product exists that is suitable for the required address (Non Standard address) Includes Hot Sites, Non Served Premises	CP choice to migrate	CP choice to migrate	CP choice to migrate	– 6 Months / x Post	x
CP Readiness e.g. not consuming Openreach FTTP, SOGFAST, SOGEA, SOTAP, FTTC or MPF product(s)	CP choice to migrate	CP choice to migrate	CP choice to migrate	– 6 Months / x Post	x
End customer readiness e.g. choose not to buy/replace equipment where the existing equipment is not compatible	CP choice to migrate	CP choice to migrate	CP choice to migrate	– 6 Months / x Post	x
End customer or CP timing e.g. will buy/replace but not until a later date. CP consumes product and timing relates to CPE or Service only	CP choice to migrate	CP choice to migrate	CP choice to migrate	– 6 Months / x Post	x
Exchange only lines	CP choice to migrate	CP choice to migrate	CP choice to migrate	– 6 Months / x Post	x

8   Data inventory

Data reports are available per CP for each trial site on request. The reports can be requested by contacting your business development manager via email or.srm.team@openreach.co.uk. CPs with 50 or over records in the trial locations will also be provided with a summary dashboard to support the line data records.

For data discrepancies, when an issue occurs (between the CP and Openreach records) the CPs should:

1. Register the issue with the Openreach migration manager for tracking purposes
2. Raise a request via the BAU self-serve ORDI facility. The user guide is available on the Openreach portal

9   Service provided by split CPs

There are a number of end customers that currently have their WLR service supplied by a number of CPs. There are many different and complex scenarios when this can happen however the most common is where the line, broadband and calls packages can be supplied by three different suppliers.

Openreach recognises the WLR or MPF CP as the existing CP when placing a migration order.

All other CPs can place a migration order, with the appropriate consumer protection longer lead time. All orders will be treated and processed on a first come first serve basis.

All parties should note – the telephone number needs to be retained if required using the number portability process, otherwise it will be ceased once the service migrates away from the existing WLR or MPF service.

10 Managed migrations

All CPs in the trial areas will be encouraged by the Openreach migration managers to prepare and share migration plans.

These plans will be used by the Openreach service delivery teams to underpin their resource to support the CP demand.

Openreach will work with the OTA2 to identify CPs who haven't engaged with any formal plans. The objective is to avoid where possible any forced migration activity towards the end of the trials, which will have the potential of end customer disruption.

11 Annex A

11.1 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.

12 Annex B

12.1 The diagram below shows the simplified Openreach portfolio to assist with migration planning.
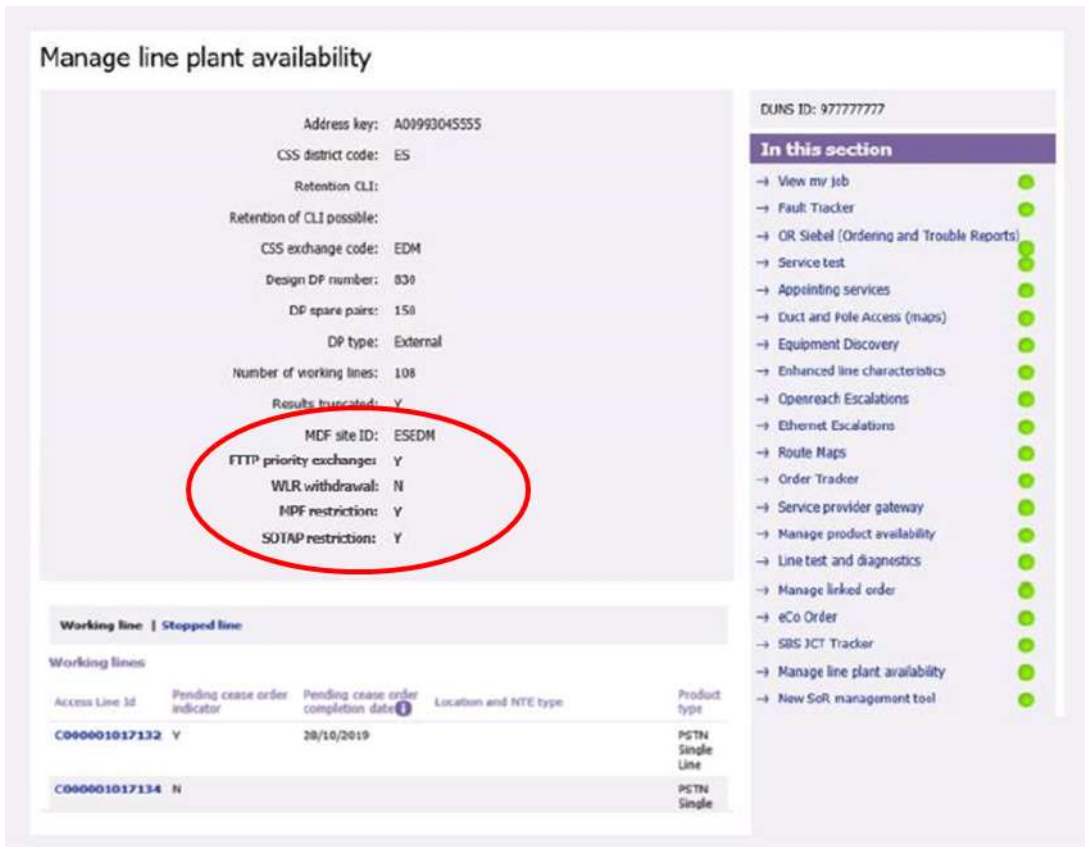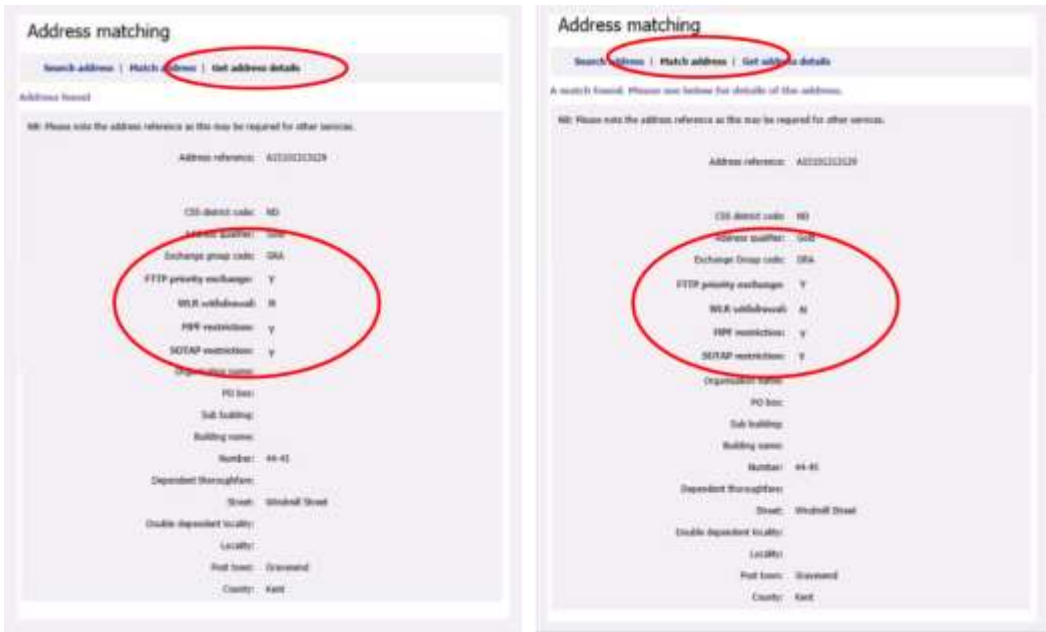
A radically simplified portfolio
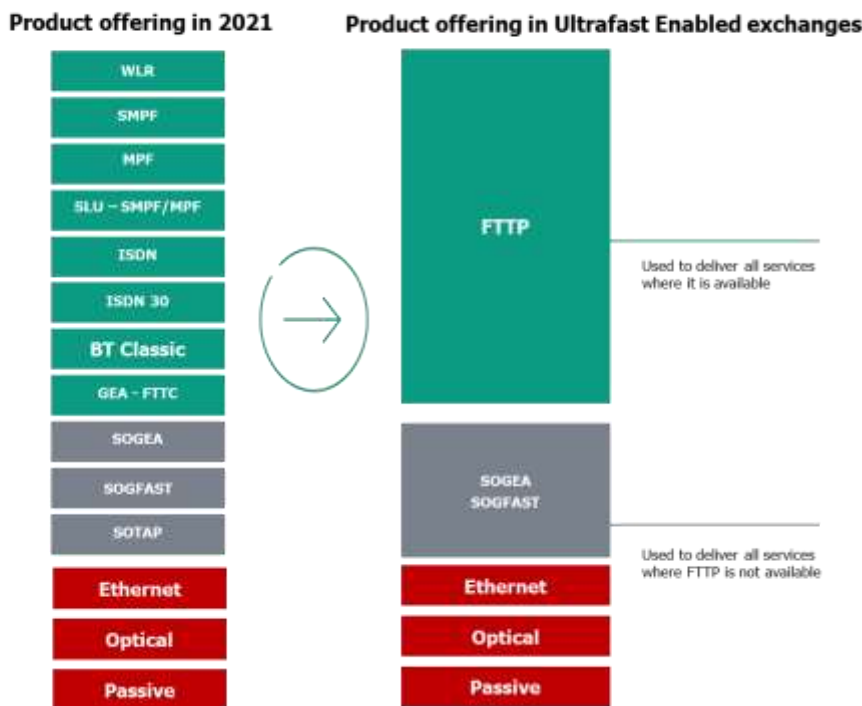
13 Annex B

13.1 Product restriction flags

To assist CPs at the point of sale through eMLC, address matching (get address and address match) and manage line plant availability dialogue services.

eMLC dialogue service

Service information

Service type:

Line ID: 01455617270
Line Status: Working

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Service compatibility

Service type	Compatibility indicator
MPF	Y
SMPF	Y
FTTC	
SOGEA	Y

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WLR Stop: Restriction Markers

FTTP priority exchange	:	Y
WLR withdrawal	:	Y
MPF Restriction	:	Y
SOTAP Restriction	:	Y

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Technology message list

Technology code	Technology text
Z	No Issues

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Open orders

14 Generic Glossary

CNI	Critical National Infrastructure
CP	Communications Provider
GEA-FTTC	Generic Ethernet Access Fibre To The Cabinet
GEA-FTTP	Generic Ethernet Access Fibre To The Premises
ISDN	Integrated Services Digital Network
LLU	Local Loop Unbundling
MPF	Metallic Path Facility
NTE	Network Terminating Equipment
SMPF	Shared Metallic Path Facility
SOGEA	Single Order Generic Ethernet Access
SOGFAST	Single Order G.fast
SOTAP	Single Order Transitional Access Product
WLR	Wholesale Line Rental
WLR Product(s)	WLR3 analogue, ISDN 2, ISDN 30, SMPF, SLU SMPF, Narrowband Line Share and Classic products