

# **Openreach Industry Consultation on:** FTTP Exchange Upgrade and Single Order Exchange Upgrade trialling

Published: 17 June 2019

Responses Requested by: 31 July 2019



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Version	Author	Date	Description
Issue 1	Phil Laws	17/6/19	Formal issued document

## 1. Executive Summary

1. Openreach is upgrading the UK's digital infrastructure, reducing reliance on legacy technologies, and increasingly using full fibre to deliver broadband and voice services.
2. As part of this upgrade programme, we consulted with Communications Providers (CPs) on the withdrawal of WLR products and transition to IP voice services in May 2018, and on an exchange-based approach to FTTP deployment and migration in March 2019.
3. The proposals in both consultations require customers to be migrated from 'legacy' platforms onto new single-order IP-ready platforms. This is a complex undertaking that will require careful planning and management across the industry. Ensuring that customers are migrated safely and smoothly is a key priority for Openreach.
4. Both of these consultations and the subsequent feedback from CPs demonstrates that there is potentially significant risk to end customers resulting from the volume of migrations that will need to take place between now and 2025 if both Openreach and CPs do not fully prepare and manage all migration scenarios
5. This includes protecting high risk end customer segments such as vulnerable end customers, Special Services (e.g. alarm lines, health pendants) and Critical National Infrastructure (CNI) lines that support the water, electricity and Gas industries amongst others.
6. In addition over this period CPs will need to consume new products and migrate end customers to new technologies with new CPE. This is a significant challenge for industry and something we should take the opportunity to fully understand and test the right approach to ensure smooth migrations for end customers.
7. An important step in this process is to develop, test and trial the best approaches to migrating end customers. To understand the supporting processes that will be needed, the best communications approach, identify edge cases and required remedies and understand how we operate a more focused forced migration phase as we get close to the end of 2025.
8. In both consultations we proposed the need for trials to help us develop and test some of the scenarios and challenges described above. There was broad support from CPs for this approach.
9. CPs noted that for a trial to be effective Openreach would need to clarify its portfolio and end customer migration journeys. CPs highlighted the difficulties of bringing forward WLR withdrawal as part of the trial, especially in relation to critical national infrastructure and Special Services.
10. Openreach is now keen to progress this trial approach with industry as a critical next step towards successfully migrating end customers by the end of 2025 and address CP feedback. It is proposed to run 2 trials: the 'FTTP exchange upgrade trial' will primarily focus on the move to FTTP products and the 'Single Order exchange upgrade trial' will focus on the move from WLR to primarily Single Order products (SOGEA/SOGFAST, GEA-FTTP and SOTAP).
11. The trials will aim to replicate as close as possible the national WLR product withdrawal and FTTP exchange upgrade plans. This will ensure that we create the right set of scenarios to understand and learn from to test our approach and processes. Openreach propose to have the required end customer journeys, network availability (including testing our ability to deploy FTTP to close to 100% of premises within and exchange area) and product enablers required to test in the trial. At the end of the trial Openreach will withdraw impacted products.
12. The trials will be in separate exchange areas, and the proposed locations are:
  - FTTP exchange upgrade trial - Salisbury, Wiltshire
  - Single Order exchange upgrade trial - Mildenhall, Suffolk
13. In the trial areas, Openreach will introduce stop sells for impacted products and withdrawal where appropriate as detailed in this document, and these will be reflected in updated national product contracts.
14. The trial areas have been selected as they are considered representative exchange areas with a good mix of CPs, end customers and additional factors detailed in Sections 3 and 4.

15. The trials will impact all existing connections, end customer premises and CPs within the trial exchanges. As such all CPs operating in the trial areas will need to move their impacted end customers to an alternative product before the end of the trials.
16. Reflecting feedback from CPs we propose that the objectives of the trials are to confirm that we can successfully migrate end customers to the new strategic products and in the process test the following:
  - A good end customer experience can be delivered
  - product stop sell capability functions as expected
  - migration processes are fit for purpose
  - migrations management processes and support are effective
  - timescales between key project milestones are reasonable
  - communications with CPs and to end customers are fit for purpose
  - information sharing process between CPs and Openreach in relation to migration planning and the commitment to a migration schedule are fit for purpose
  - needs of all customer segments can be met, including edge case installations
  - migration of all end customers are achieved by the end of each trial
17. We think it is important to begin trials as soon as practical to maximise the time available for learning before larger scale migrations are needed. Our proposed timeline for the trials is shown below.

### Timing overview

#### FTTP exchange upgrade trial

<b>Trials consultation</b>	17 June 19
<b>Trials consultation close</b>	31 July 19
<b>Trial consultation response and trial notification</b> – Confirm trial details and timescales to industry	3 September 19
<b>75% build trigger point achieved</b>	September 19
<b>12 month notification of legacy products stop sell</b>	October 19
<b>Trial start – voluntary transfers</b> – customers start moving to GEA-FTTP as planned migrations	January 20
<b>Product enabler</b> - Low Speed fibre product <b>Stop sell of legacy copper products in trial area</b>	September 20
<b>Product enabler</b> - Fibre Non Standard Line products	January 21
<b>Product enabler</b> - Fibre Non Standard Line products	Q2 21
<b>Product enabler</b> - Fibre Non Standard Line products	Q3/Q4 21
<b>Start of orphaned asset transfer phase</b>	January 2022
<b>Migrations complete and trial closed</b> <b>Legacy products withdrawn in trial area</b>	December 22

#### Single Order exchange upgrade trial

<b>Trials consultation</b>	17 June 19
<b>Trials consultation close</b>	31 July 19
<b>Trial consultation response and trial notification</b> – Confirm trial details and timescales to industry	3 September 19
<b>Trial start – voluntary transfers</b> customers start moving to Single Order products as planned migrations	September 19
<b>12 month notification of legacy products stop sell</b>	October 19
<b>Product enabler: SOTAP Pilot, Low Speed fibre products</b> <b>Stop sell of legacy products in trial area</b>	January 20
<b>Product enabler</b> - Fibre Non Standard Line products	September 20
<b>Product enabler</b> - Fibre Non Standard Line products	January 21
<b>Product enabler</b> - Fibre Non Standard Line products	Q2 21
<b>SOTAP launch</b>	Q3/Q4 21
<b>Start of orphaned asset transfer phase</b>	January 2022
<b>Migrations complete and trial closed</b> <b>Legacy products withdrawn in trial area</b>	December 22

18. MPF stop sell is in scope for the FTTP exchange upgrade trial.
19. In order to achieve the trial aims and objectives and to create as much learning opportunity as possible Openreach is proposing that in the Single Order exchange upgrade trial MPF stop sell and withdrawal is in scope where fibre product alternatives are available. We believe that otherwise there would be an incentive to move end customers from WLR to MPF which is both a highly understood and volume migration scenario that happens today. This will not provide us with valuable learning that will come from

migrating these end customers to the future strategic products such as SOGEA that will make up the volume of migrations as we move towards 2025 as part of the national WLR product withdrawal.

20. In addition we believe that CPs are interested in understanding the cost saving opportunities of exchange rationalization by removing equipment and consolidating interconnect in exchanges where MPF is no longer required. The single order exchange upgrade trial provides this opportunity if the trial location itself is not an Openreach Handover Point (OHP).
21. Openreach therefore proposes that MPF and SLU MPF stop sell and withdrawal are also included in the Single Order exchange upgrade trial and follow the same rules as proposed for SOTAP. This would mean that MPF is only withdrawn from addresses which have SOGEA/SOGFAST and GEA-FTTP available. Any MPF lines outside the fibre footprint would remain in place.
22. For CPs wishing to offer voice services only to end customers and in line with previous consultation feedback, Openreach plans to develop low speed fibre product variants to meet this need with exact product characteristics to be agreed with industry as detailed in Section 5.
23. For end customers requiring Non Standard lines, Openreach plans to develop suitable products within our fibre portfolio as detailed in Section 5.
24. The withdrawal of WLR and MPF products will not only impact residential and business services but may also impact providers of Special Services (e.g. security alarms, lift phones). Openreach is currently working with CPs and industry to consider the requirements for a Special Services testing facility to ensure a smooth transition to alternative services.
25. Openreach will work with its CP customers to make sure that end customer connectivity is maintained throughout the trial. We will continue to hold working group sessions with industry to make sure CPs have the correct level of engagement to minimise the impact on end customers.
26. In the final phase of the trials, if there are premises that are enabled for the appropriate Single Order, GEA-FTTP or Ethernet product that have not migrated lines from an impacted product or have no plans to do so they will be classified as 'orphaned'. Orphaned lines will be subject to the orphaned end customer process as detailed in paragraphs 138 and 139. Lines not migrated at the end of the orphaned asset process will ultimately be ceased.
27. Openreach uses WLR3 analogue to provide monitoring capabilities for some of its products and the migration of these lines will be included within the trials timescales.
28. In order for the trials to be successful and enable the industry to learn, Openreach and CPs will need to collaborate.
29. Openreach will put in place dedicated migrations support teams for the trials that will include trial documentation, contact/escalation points and updated customer service plans.
30. To protect end customers service, Openreach will agree processes with industry to ensure that in the event of an end customer migration failing, the migration can be rolled back to a previous state to ensure continuity of service whilst investigations are carried out.
31. In order that CPs can continue to provide services to their end customer in the trial areas they must ensure that they can consume the appropriate Openreach products in those areas:
  - FTTP exchange upgrade trial: GEA-FTTP, SOGEA/SOGFAST, Ethernet
  - Single Order exchange upgrade trial: SOGEA/SOGFAST, GEA-FTTP, SOTAP, Ethernet
32. Openreach are committed to working with CPs to make the trials a success and recognise that we will need to provide better quality information and insight to enable CPs to communicate clearly with end customers.
33. We recognise that each customer segment will have differing needs in relation to communication about the projects, migration planning and on the day migration and Openreach will work with CPs to achieve a successful outcome for each.
34. CPs should identify how their end customers are using the legacy products and understand if there are any special devices connected to NTEs which will need to be considered during the migration and to ensure continued operation post migration.

35. In particular CPs should establish the specific needs of any Vulnerable end customers and CNI organisations (defined by UK government as those organisations necessary for a country to function and upon which daily life depends, in the following industry sectors: Chemicals, Civil Nuclear, Communications, Defence, Emergency Services, Energy, Finance, Food, Government, Health, Space, Transport and Water) they provide service to.
36. Openreach will work with Industry to develop bulk migration processes to seek efficiencies of scale where possible.
37. Openreach will hold an industry session on 20 June 2019 in London to discuss any questions that may arise from this consultation. Registration will be required for this session and attendance may be limited if demand is high. Requests should be sent to [wlr.consultation.feedback@openreach.co.uk](mailto:wlr.consultation.feedback@openreach.co.uk)
38. Throughout this document the term 'migration' should be taken in the context of movement between assets (products).

## 2. Consultation Aims, Objectives, Process and Submission Details

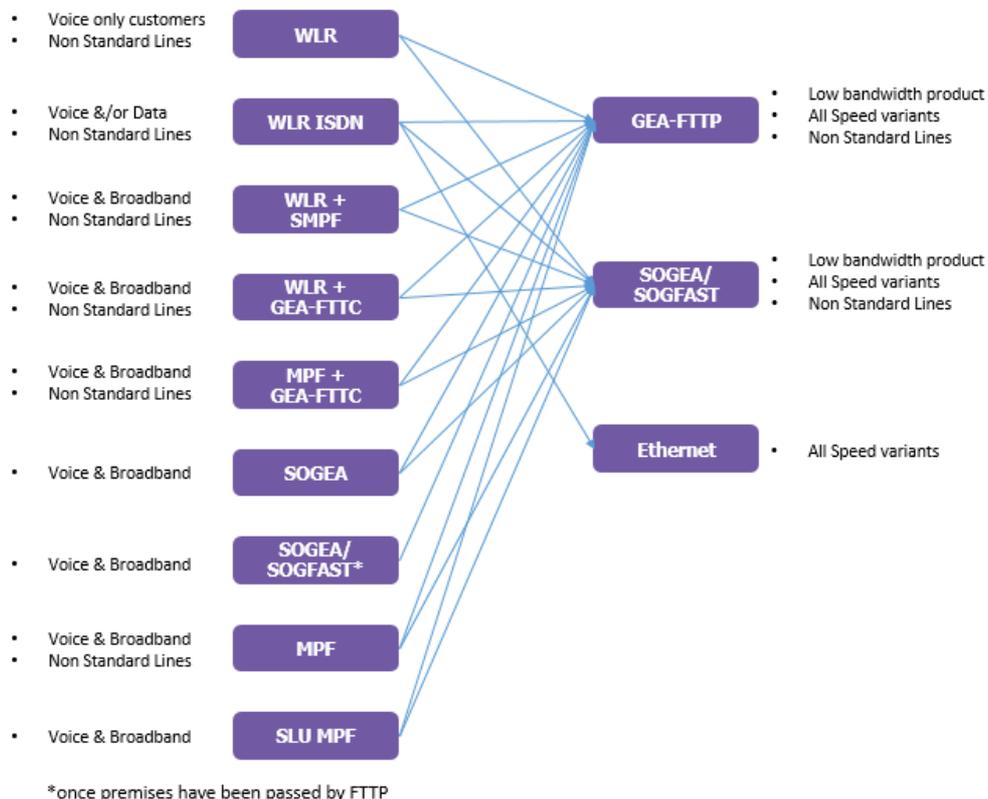
39. The consultation opens on 17 June 2019.
40. Responses from CPs and interested parties are requested by 31 July 2019.
41. During this period, Openreach will engage directly with stakeholders to answer questions and explore any points that participants may wish to include in their formal submissions.
42. The consultation marks the start of our formal customer engagement process that will be conducted through the following industry communications channels:
  - WLR withdrawal industry working group
  - Individual bi-lateral meetings if requested by CPs, TPIs and the wider industry
  - Proactive multi-lateral meetings run by Openreach with CPs, TPIs and the wider industry on specific topics
  - Meetings with representative industry groups e.g. Federation of Communication Services (FCS)
  - A consultation discussion session on 20 June 2019 to be held in London
43. Openreach runs industry working groups, co-chaired by the OTA to progress the withdrawal of the WLR product portfolio and it is proposed to include within that forum updates on the FTTP exchange upgrade trial. It is expected that the OTA will continue to play a key role in helping facilitate the development of industry plans and processes to be tested in the trials. The industry working groups will continue to run alongside standard industry fora and any bilateral sessions requested by CPs.
44. The objectives for this consultation are to engage with our CPs, their TPIs and resellers and wider stakeholders within the industry to include industry associations and Special Service providers in order to collect feedback and comments.
45. The interconnect process for managing calls between communications providers is out of scope for this consultation.
46. We encourage participants to be open and collaborative, recognising that at this stage we are consulting on how we achieve the successful migration to the strategic products.
47. Individual responses will be treated as confidential by Openreach.
48. Following the closure of the consultation period we expect to produce an anonymised summary of the inputs from respondees and so formalise how we will progress with the trials.
49. We will not disclose specific views or inputs from individual respondents without their prior approval.
50. Summary of Consultation Key Dates
  - 17 June 2019 consultation document published
  - 20 June 2019 consultation discussion session to be held in Riverside House, London
  - 31 July 2019 Deadline for formal submission of responses
  - 3 September 2019 Openreach to issue anonymised summary of responses

51. Responses should be sent by email to [wlr.consultation.feedback@openreach.co.uk](mailto:wlr.consultation.feedback@openreach.co.uk)
52. As an open invitation to ongoing dialogue on this consultation, if CPs or interested parties wish to hold bi-lateral discussions with Openreach prior to the submission of their response to the consultation, then please contact your Sales and Relationship Manager (where appropriate) or email [wlr.consultation.feedback@openreach.co.uk](mailto:wlr.consultation.feedback@openreach.co.uk)

### 3. FTTP exchange upgrade trial

53. The FTTP exchange upgrade trial is proposed to be located in Salisbury, Wiltshire.
54. Salisbury exchange details:
- SAUID                      STSALIS
  - 1141 code                SA
  - The exchange is an OHP
55. The following selection criteria was used to select Salisbury:
- The first fibre city to have full FTTP coverage in line with how our planned exchange upgrade approach would be deployed moving forwards
  - Medium-sized city giving a good mix of end customers
  - Single exchange area which covers the majority of the city
  - Support from local government
  - Exchange that is representative in terms of the CPs present and a typical range of services consumed from Openreach
56. The primary product available will be GEA-FTTP, however there may be some premises where SOGFAST will be the initially offered product.
57. Where SOGFAST is available to a premise, SOGEA will also be available to that premise.
58. SOTAP will not be available within the FTTP exchange upgrade trial.
59. The FTTP build in Salisbury has started and we will provide information about handover point and Layer 2 switch data via the usual channels. We also intend to release premises served with FTTP in the normal way, each week issuing a list of premises which can purchase GEA-FTTP.
60. Proposed trial timeline:
- |  |                               |
|--|-------------------------------|
| ○ Start voluntary migrations                   | As premises are fibre enabled |
| ○ Product stop sell                            | September 2020                |
| ○ Orphaned asset migration start               | January 2022                  |
| ○ Withdrawal of stopped products in trial area | 5 December 2022               |
| ○ Trial closure                                | 5 December 2022               |
61. The FTTP build in Salisbury is well progressed and it is planned that 75% of premises will be enabled for GEA-FTTP or SOGFAST in September 2019, so stop sell will be September 2020. This will be communicated in a formal notification expected to be in September 2019.
62. The stop sell will apply at a premises level to any premise that has access to GEA-FTTP or SOGFAST at the point an order is placed. Premises not within the footprint will not be impacted by the stop sell.
63. Following the implementation of stop sell, fibre build will continue and as each premises is subsequently enabled for GEA-FTTP or SOGFAST this will be indicated on the Technology Markers for that premise and impacted by the stop sell. In this scenario, a 12 month notification of stop sell will not apply to these premises.
64. Based upon consultation feedback, Openreach plan to offer CPs more information to enable them to make an informed choice about the products they buy, Openreach proposes to show through a report or Dialogue Services:
- Premises where GEA-FTTP or SOGFAST is available
  - Premises at which GEA-FTTP or SOGFAST is under construction, with indicative completion dates

- Premises at which GEA-FTTP or SOGFAST is unlikely to be available e.g. an MDU with no landlord permission
65. Non served premises locations will be subject to the stop sell as soon as replacement products detailed in Section 5 are available and those locations are enabled for GEA-FTTP or SOGFAST as indicated on the Technology Markers for that location. In this scenario, a 12 month notification period will not apply to these locations. Once enabled, plans for migrations should be scheduled by CPs.
66. Premises impacted by the stop sell in the trial area will have one or more of the following products available for order, identified through Technology Markers:
- GEA-FTTP
  - SOGEA/SOGFAST
  - Ethernet
67. Technology Markers are visible to CPs as part of the address matching dialogue service, in advance of order placement.
68. Product migration options for impacted products are as shown below. There will be one option of GEA-FTTP or SOGEA/SOGFAST available per premises:



69. Following the stop sell, for premises within the GEA-FTTP or SOGFAST footprint:
- There will be no new supply of impacted products as listed in Section 3.1 and any orders received for them will be rejected.
  - Certain order journeys will still be allowed, and these are detailed in Section 6
  - If an order is taken for an impacted product for a premise that is outside the GEA-FTTP or SOGFAST footprint, but prior to fulfilment it then falls within the GEA-FTTP or SOGFAST footprint, it will be fulfilled.
70. Openreach will work with CPs to determine how the needs of customer segments e.g. voice-only end customers can be met. Proposals for product enhancements are detailed in Section 5.

71. Any lines outside the GEA-FTTP or SOGFAST footprint at the end of the trial will remain on the existing product and the trial stop sell will not apply to them. These lines will be impacted by the national WLR withdrawal programme.
72. All New Sites contracted in the trial area from the end of 2019 will be planned to be based upon FTTP technology.
73. Following the build of GEA-FTTP or SOGFAST to the majority of premises, the following products will be formally withdrawn within the trial area:
- WLR Product(s)
  - MPF
  - SLU MPF (except where a CP already consumes SLU-MPF services)
74. Openreach will work with CPs to raise awareness of the trial with end customers, and consider what communications may be required to support a wider rollout across the UK.
75. Openreach recognises the necessarily compressed timeline of the trials leading to stop/sell and withdrawal of impacted products and is considering the appropriate commercial support it can put in place. We intend to provide further detail to CPs over the Summer 2019.
76. The trial will conclude on 5 December 2022.

### 3.1 Impacted products

77. The following products will be subject to stop sell and withdrawal within the trial location
- WLR Product(s) (where premises have a GEA-FTTP or SOGFAST Technology Marker)
  - MPF (where premises have a GEA-FTTP or SOGFAST Technology Marker)
  - SLU MPF (where premises have a GEA-FTTP Technology Marker)
  - GEA-FTTC (where premises have a GEA-FTTP or SOGFAST Technology Marker)
  - SOGFAST/SOGFAST (where premises have a GEA-FTTP Technology Marker)

### 3.2 Specific success criteria

78. The overall trial success criteria are detailed in Section 9, and the following additionally apply to the FTTP exchange upgrade trial
- a) The proportion of premises built with GEA-FTTP and SOGFAST (ultimate target is 100%)
  - b) Build triggers are communicated at the appropriate time
  - c) Incremental build information is shared with CPs in a timely manner
  - d) Timely notification of premises that are hard to reach with FTTP
  - e) Remedies developed for premises hard to reach with FTTP

### 3.3 Questions for CPs

79. CPs are invited to comment on:
1. [Salisbury as the proposed FTTP exchange upgrade trial location](#)
  2. [Their ability to migrate all end customer segments to GEA-FTTP or SOGFAST in the project timescales](#)
  3. [The changes that will be required to national contracts to reflect the product stop sells in the FTTP exchange upgrade trial.](#)
  4. [How best to share migration plans to ensure minimal disruption to their business and their end customers](#)

5. How best to manage the end customer experience whilst working with Openreach to plan the associated resource required to perform the migrations
6. What CPs think is required to raise awareness of the trial with end customers and interested parties in the trial area.
7. What part CPs think that Ofcom, Openreach and CPs themselves can play to support end customer communications
8. The proposal for a 'planned build date' indicator on Dialogue Services and how that would help CPs to plan end customer communications and migrations

#### 4. Single Order exchange upgrade trial

80. The Single Order exchange trial is proposed to be located in Mildenhall, Suffolk.

81. Mildenhall exchange details:

- SAUID                      EAMIL
- 1141 code                MJV
- The exchange is not an OHP

82. The OHP for Mildenhall is located at Newmarket.

83. Newmarket exchange details:

- SAUID                      EANMK
- 1141 code                NR

84. The following selection criteria was used to select Mildenhall, which is considered to be a representative exchange area:

- Size and number of CPs offering a typical range of Openreach services
- Reasonable size (c.8-10k lines)
- Mix of Businesses and Consumers
- Locations with edge case technologies (e.g. Pair gain/EO lines)
- Long lines/low speed lines
- EVOTAM or LLU TAM present
- CNI organisations present
- Non Standard lines/Non Served premises present
- Not an OHP location

85. Proposed Trial Timeline:

- |  |                 |
|--|-----------------|
| ○ Start voluntary migrations                   | October 2019    |
| ○ Notification of products stop sell           | January 2020    |
| ○ SOTAP pilot start                            | January 2021    |
| ○ Products stop sell                           | January 2021    |
| ○ Orphaned asset migration start               | January 2022    |
| ○ Withdrawal of stopped products in trial area | 5 December 2022 |
| ○ Trial closure                                | 5 December 2022 |

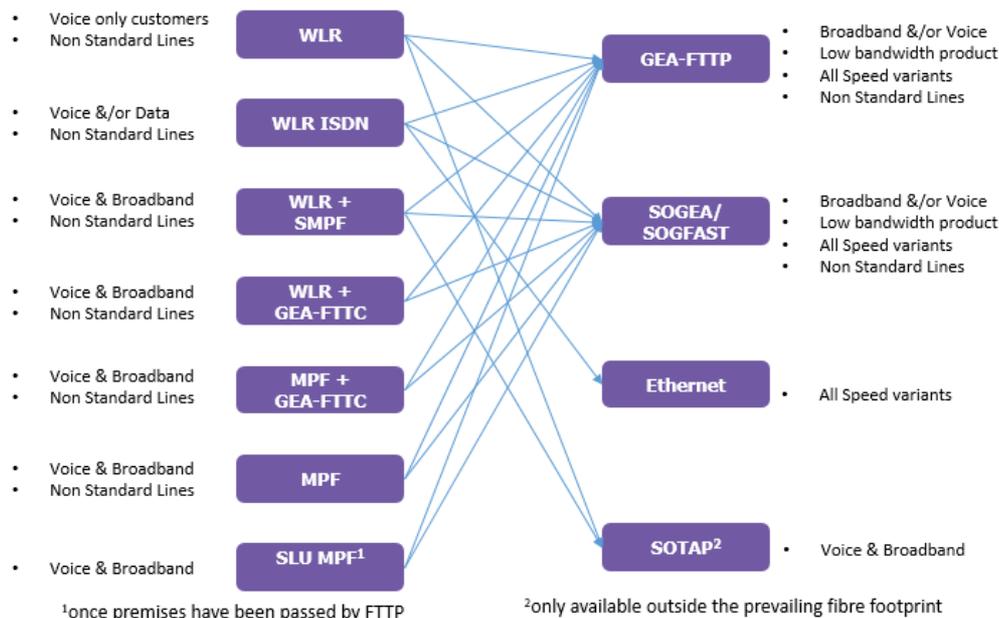
86. The timeline for the Single Order exchange upgrade trial differs to the FTTP exchange upgrade trial due to the dependency on the availability of the SOTAP pilot product.

87. Stop sell is expected to be notified in January 2020 for the impacted products as detailed in Section 4.1 in the trial exchange area to align with the SOTAP pilot start date (which will be no earlier than January 2021). Formal notification of stop sell will be briefed once the SOTAP pilot dates have been confirmed.

88. Stop sell will apply at a premises level to any premise that has access to GEA-FTTP, SOGEA/SOGFAST or SOTAP at the point an order is placed. Premises not within the footprint will not be impacted by the stop sell.

89. Non served premises locations will be subject to the stop sell as soon as replacement products detailed in Section 5 are available and those locations are enabled for GEA-FTTP, SOGEA/SOGFAST or SOTAP as indicated on the Technology Markers for that location. In this scenario, a 12 month notification period will not apply to these locations. Once enabled, plans for migrations should be scheduled by CPs.
90. Premises within the trial area will have one of the following products available to order, identified through the Technology Markers:
  - SOGEA/SOGFAST
  - GEA-FTTP
  - SOTAP
  - Ethernet
91. Where SOGEA is available, SOGFAST may be subsequently offered at the same locations subject to the G.fast rollout and this will be communicated through the usual channels.
92. Technology Markers are visible to CPs as part of the address matching dialogue service, in advance of order placement.
93. Product migration options for impacted products are as shown below. There will be one option of GEA-FTTP, SOGEA/SOGFAST or SOTAP available per premise:

**Single Order exchange upgrade trial – product migration options**



94. Following the stop sell:
  - There will be no new supply of impacted products as listed in Section 4.1 and any orders received for them will be rejected.
  - Certain order journeys will still be allowed, and these are detailed in Section 6
95. Openreach will work with CPs to determine how the needs of customer segments with particular needs e.g. voice-only end customers can be met. Product enhancements proposals are detailed in Section 5.
96. Openreach will work with CPs to understand the options for end customers if SOTAP will not support a broadband capability required to provide a voice only service.
97. All New Sites contracted in the trial area from the end of 2019 will be based upon GEA-FTTP or SOGEA/SOGFAST technology.

98. Openreach will work with CPs to raise awareness of the trial with end customers, and consider what communications may be required for the national WLR withdrawal programme.
99. Following the build of GEA-FTTP or SOGEA/SOGFAST to each premise, the following products will be formally withdrawn within the trial area:
- WLR Product(s)
  - MPF and SLU MPF (subject to agreement, as per paragraph 21)
100. Openreach recognises the necessarily compressed timeline of the trials leading to stop/sell and withdrawal of impacted products and is considering the appropriate commercial support it can put in place. We intend to provide further detail to CPs over the Summer 2019.
101. The trial will conclude on 5 December 2022.

#### 4.1 Impacted products

102. The following products will be subject to stop sell and withdrawal within the trial location
- WLR Product(s) (where premises have a GEA-FTTP, SOGEA or SOGFAST Technology Marker)
103. Openreach would like to additionally stop sell and then withdraw (subject to agreement as per paragraph 21)
- MPF (where premises have a GEA-FTTP, SOGEA or SOGFAST Technology Marker)
  - SLU MPF (where premises have a GEA-FTTP Technology Marker)

#### 4.2 Specific success criteria

104. The overall trial success criteria are detailed in Section 9.

#### 4.3 Questions for CPs

105. CPs are invited to comment on:
9. Mildenhall as the proposed Single Order exchange upgrade trial location
  10. The inclusion of MPF and SLU MPF stop sells and withdrawals within the Single Order exchange upgrade trial
  11. The timing of the Single Order exchange upgrade trial stop sell date
  12. The changes that will be required to national contracts to reflect the product stop sells in the Single Order exchange upgrade trial
  13. How best to share migration plans to ensure minimal disruption on their business and their end customers
  14. How best to manage the end customer experience whilst working with Openreach to plan the associated resource required to perform the migrations
  15. The implications of the restrictions being proposed
  16. Options for end customers if SOTAP will not support a broadband capability required to provide a voice only service
  17. How CPs best manage the migration of existing ADSL end customers within the fibre footprint

### 5. Product Launch information

106. Openreach have trialed and developed new wholesale access products which offer 'standalone broadband', which will sit alongside our existing Ethernet, GEA-FTTP, GEA-FTTC and MPF services:
- SOGFAST - enables Openreach to deliver ultrafast broadband services over existing copper lines and remains a critical component to our ultrafast strategy.
  - SOGEA - provides a GEA-FTTC 'Fibre Broadband' line without the voice service.

- Both products are currently being trialled prior to a full commercial deployment which is planned during 2019.

107. Openreach is also developing SOTAP, that is intended to be available outside the prevailing fibre footprint, which is considered in terms of the availability of a fibre offering to an individual premise.
108. SOTAP will enable those CPs that buy WLR and SMPF to continue to use their unbundled exchange equipment to provide ADSL-based services and reduce the requirement for physical re-jumpering of lines to new equipment. A WLR or SMPF CP will need a local exchange presence to use SOTAP. Those CPs without a local presence would be expected to purchase a SOTAP supported service from a wholesale operator in the trial exchanges.
109. The following product enhancements are anticipated to be required to support the trials. Exact specifications, launch timescales and pricing are to be confirmed through CFPCG. Launches will be subject to successful pilot outcomes being achieved:

### **5.1 GEA-FTTP**

110. For the trial, a low bandwidth GEA-FTTP product will be developed primarily for the use of voice only end customers
111. Non Standard lines GEA-FTTP products (full list to be defined)

### **5.2 SOGEA**

112. SOGEA will be launched in October 2019
113. For the trial, a low bandwidth SOGEA product will be developed primarily for the use of voice only end customers
114. Non Standard lines SOGEA products (full list to be defined)

### **5.3 SOGFAST**

115. SOGFAST will be launched in October 2019
116. Non Standard lines SOGFAST products (full list to be defined)

### **5.4 SOTAP**

117. SOTAP will be tested in the Swansea Play Pen from March 2020
118. SOTAP will be in trial from September 2020
119. SOTAP will be piloted from January 2021 in Mildenhall
120. SOTAP will be launched nationally in September 2021
121. SOTAP Non Standard lines products (full list to be defined) will be available at national launch and through the pilot stage

### **5.5 Questions for CPs**

122. CPs are invited to comment on:
- 18. [The need for and specification of the proposed new product variants on GEA-FTTP, SOGEA, SOGFAST and SOTAP](#)

## **6. Product Stop sell**

123. EMP changes will be required to enable stop sell for the relevant products, but it is not expected that CPs will need to consume these EMP updates for the L2C order journeys in the trials. Openreach will advise CPs about the need to consume EMP updates.
124. Dialogue Services should be used by CPs to determine the availability of products at a premise before an order is placed.

125. It is important throughout the stop sell and withdrawal process that CPs have the ability to manage their existing customer assets with the ability to manage debt and stop unwanted calls so following stop sell, certain order journeys will still be allowed.
126. During the trial some CPs will want to novate and consolidate their end customer assets. This will be allowed during the trial, however there is no plan to enhance the novation process to change the legal entity and migrate product assets to any additional alternative products.
127. Repair journeys will be supported until the end of the trial, however any orphaned end customer lines may have limited access to the repair journey, meaning that functionality will be further limited for these end customers.
128. For the FTTP exchange upgrade trial order restrictions will apply post the stop sell based on the available product at the target premises
- Where premises have been enabled for GEA-FTTP or SOGEO/SOGFAST no changes will be allowed to an existing MPF or WLR Product(s) except for some modify orders but excluding those that increase the number of channels or lines. Additionally, speed upgrades will not be allowed to existing GEA-FTTC products.
  - Where premises have not been enabled for GEA-FTTP or SOGEO/SOGFAST, they will not be impacted by the stop sell. Premises subsequently enabled will then be subject to the stop sell restrictions.
129. For the Single Order exchange upgrade trial order restrictions will apply post the stop sell based on the available product at the target premises
- Where premises have been enabled for GEA-FTTP or SOGEO/SOGFAST no changes will be allowed to an existing MPF or WLR Product(s) except for some modify orders but excluding those that increase the number of channels or lines. Additionally, speed upgrades will not be allowed to existing GEA-FTTC products.
  - Where premises have not been enabled for GEA-FTTP or SOGEO/SOGFAST, no changes will be allowed to existing WLR Product(s) except for some modify orders but excluding those that increase the number of channels or lines. Any new supply in this scenario will need to be to an alternative product to include Ethernet, SOTAP or MPF.

## 6.1 Questions for CPs

130. CPs are invited to comment on:
- [19. The application of stop sell restrictions per premises](#)
  - [20. The proposed stop sell restrictions in relation to allowed/disallowed order journeys](#)

## 7. Managing migrations

131. CPs shall ensure that end customer migrations will be completed by the end of the trials.
132. There will be a number of migration paths that will impact on end customers and therefore will need careful planning in order to make the migration to alternative products a smooth transition.
133. As CPs move their assets the final bills for the specific CLIs will be generated as per the current product business as usual processes.

## 7.1 Questions for CPs

134. CPs are invited to comment on:
- [21. The preferred approach to managing migrations: singly, by exchange, cabinet area, road, customer segment or another approach](#)

## 8. Meeting end customer needs

135. Through the trials, consideration will need to be given to all end customers but particular focus will be needed for those determined to be vulnerable by CPs.

136. CPs should identify CNI end customers in order that their needs are carefully considered so as to minimise the impact on their business function.
137. Openreach will work with CPs with the goal of migrating all lines within the project timescales, however we recognise that there may be edge cases that will not have a straightforward migration path e.g. traffic lights, bus stops.
138. End customers whose premises are enabled for the appropriate Single Order or Ethernet product, but whose services have not been migrated or for whom there are no plans to migrate by January 2022 will be considered 'orphaned'. Orphaned end customers will be migrated using the 'orphaned asset migration' process currently being developed for WLR withdrawal through the WLR withdrawal programme, which will be enhanced to cover all impacted products within the trials. The process will have appropriate checks and balances to ensure that the needs of the end customers and CP are managed.
139. There are 4 proposed stages to the orphaned asset migration process, summarised below:
- CP specific reporting (from January 2021) to show volume of lines that have not as yet been migrated
  - Escalation 1 (October 2021) reminding CPs of the withdrawal dates and notifying OTA2/Ofcom of the list of CPs who have not yet confirmed migration plans
  - Escalation 2 (January 2022) communications to end customers. Further update to OTA2/Ofcom
  - Escalation 3 (December 2022) Products withdrawn in the trial areas. Lines still not resolved will have broadband removed and voice lines to be made 999 only for a period of time, followed by the cessation of all assets.
140. End customers whose premises are not enabled for the appropriate Single Order or Ethernet product will not need to be migrated.
141. CPs will be supported by Openreach to engage with the suppliers of Special Services (alarms, health pendants, EPOS equipment etc.) to make sure that connectivity is maintained throughout the transition to an alternative product. CPs are encouraged to work with suppliers of Special Services to test in advance of transition in order to ensure that connectivity is maintained once the service is moved to the new product.
142. To this extent Openreach intends to offer an Industry-wide testing facility and is interested to hear CP's views on the specification of such a facility.
143. Openreach understands that end customers may be on long term contracts with CPs and would like to hear from CPs about potential barriers to migration and what can be done to overcome them.

## 8.1 Questions for CPs

144. CPs are invited to comment on:
- 22. Their ability to identify vulnerable end customers, customers with Special Services and proposals for how these customer needs will be met
  - 23. The need for and specification of a testing facility to test Special Services and edge case customer needs
  - 24. How the needs of end customers with long term contracts can be met within trial timescales
  - 25. How the needs of large UK-wide customers can be met through a migration of lines in trial locations only to single order products

## 9. Overall trials success criteria

145. The trials involve a complex undertaking that will require careful planning and management across industry. Ensuring that customers are migrated safely and smoothly is a key priority for Openreach.
146. The trials will be used to confirm the best approach to migrating end customers, the supporting processes required and the best communications approach.
147. The trial success criteria will ensure that learning can be taken to inform the national programmes, when migration of end customer lines will needed to be performed at scale in multiple geographies:

- a) All lines are migrated within trial timescales where alternative single order products are available
- b) To ensure that trial-related communications from Openreach to CPs are fit for purpose and produced in a timely fashion
- c) End customer communications are fit for purpose and produced in a timely fashion
- d) CPs can create lines inventories and end customer migration plans
- e) CPs can easily and securely share migration plans for the trial with Openreach
- f) The migration of voice only end customers to a single order product is a good customer experience
- g) The migration of CNI end customer lines to suitable products is a good customer experience
- h) Any bulk migration process is fit for purpose
- i) Migration appointing books can be managed to meet CPs volume needs
- j) Migration journeys for each customer segment are fit for purpose
- k) A good level of co-ordination between Openreach, CPs, end customers and any other third party is achieved during migrations
- l) Fit for purpose MIS in place
- m) Openreach and CPs can resource to meet the forecast migration schedule
- n) Processes for vulnerable end customer identification are fit for purpose
- o) Special Services in use have been identified and testing undertaken to ensure a successful migration and continuation of service
- p) CPs use Technology Markers to identify the appropriate single order product before placing orders
- q) Stop sell, contract and withdrawal notifications are communicated at the appropriate time
- r) Fit for purpose service wraps are developed for each customer segment/line type
- s) Stop sell functions correctly per premises and for allowed and non-allowed order journeys
- t) Relevant products can be withdrawn geographically
- u) Processes function as expected during migrations to include roll-back if problems occur
- v) To prove the orphaned asset process is fit for purpose for all customer segments/line types
- w) To ensure that as many Non Served Premises as possible have been served in the trial areas with an appropriate single order product and for any exceptions, to work on solutions that will enable their future migration to a single order product
- x) Where migrations cannot be completed on time due to the non-availability of alternative single order products for specific customer segments, migration plans will need to be developed

## 9.1 Questions for CPs

148. CPs are invited to comment on:

[26. The proposed trials success criteria](#)

## 10. Trials governance

- 149. Openreach proposes to set up a Trials Working Group, co-chaired by the OTA under the auspices of the WLR Working Group governance to oversee both trials.
- 150. Openreach will assign a trials manager to each trial who will be responsible for managing the project to time and Industry engagement.
- 151. Openreach shall construct suitable MIS reports for each trial to show progress

152. CPs shall communicate end customer migration requirements (timing/support etc.), volumetrics and timescales to Openreach in order to ensure that resources can be efficiently managed and migrations scheduled to meet the needs of customers.

### 10.1 Questions for CPs

153. CPs are invited to comment on:

- 27. Openreach's proposed trials governance
- 28. How CPs will manage the trials from their perspective

## 11. Legal and Regulatory Considerations

154. Openreach plans are subject to change due to ongoing dialogue with stakeholders, further Openreach considerations or changes to Government or Ofcom plans.
155. Forward-looking statements and any assumptions are reasonable based on current information, Openreach cannot give an assurance that these will prove to be correct.
156. Factors that could cause differences between actual outcomes and those implied by the forward-looking statements include, but are not limited to: material adverse changes in economic and financial markets conditions in the markets served by Openreach; supplier arrangements; future regulatory actions and conditions in Openreach's operating areas; technological innovations; developments in the convergence of technologies and the anticipated benefits and advantages of new technologies, products and services, including broadband, not being realised.
157. The proposals contained in this document for trialling represent Openreach's view at the time of publication. It does not represent a finalised definition or plan for implementation or any commitment to implement, which is dependent on further consultation with stakeholders and assessment of relevant commercial, legal and regulatory considerations. Any developments carried out by a CP based on the contents of this document are entirely at the CP's own risk.
158. BT has been designated by Ofcom as a universal service provider and has obligations to provide, upon reasonable requests, end customers with access to telephony services (allowing for making and receiving national and international calls and functional internet access) and broadband services at fixed locations in the UK excluding Hull and at affordable prices. These obligations are discharged, as appropriate, by Openreach and by downstream BT.
159. Changes to the national obligation to provide service will be necessary in trial areas and these will be agreed with Ofcom.

### 11.1 The proposed contract changes

160. The WLR, LLU and SLU contracts, including ancillary documents, will need to be amended to reflect the necessary steps to withdraw the affected products in the trial areas.
161. The stages will be:

	<b>FTTP exchange upgrade trial</b>	<b>Single Order exchange upgrade trial</b>
Notification of the locations where the relevant products will no longer be available for order, or provision	September 2019	January 2020
Agree and introduce a migration schedule, to support the migration, or cessation of affected products	January 2020 to April 2020	January 2020 to April 2020
Negotiation and notification of contract changes to support stop sell	April 2020 to September 2020	August 2020 to January 2021

## 11.2 Questions for CPs

162. CPs are invited to comment on:

29. The Regulatory enablers for the trials
30. The proposed contract changes and notification timescales

## 12. Summary of questions

163. FTTP exchange upgrade trial

1. Salisbury as the proposed FTTP exchange upgrade trial location
2. The ability to migrate all end customer segments to GEA-FTTP or SOGEA/SOGFAST in the project timescales
3. The changes that will be required to national contracts to reflect the product stop sells in the FTTP exchange upgrade trial
4. How best to share migration plans to ensure minimal disruption on their business and their end customers
5. How best to manage the end customer experience whilst working with Openreach to plan the associated resource required to perform the migrations
6. What CPs think is required to raise awareness of the trial with end customers and interested parties in the trial area
7. What part CPs think that Ofcom, Openreach and CPs themselves can play to support end customer communications
8. The proposal for a 'planned build date' indicator on Dialogue Services and how that would help CPs to plan end customer communications and migration

164. Single Order exchange upgrade trial

9. Mildenhall as the proposed Single Order exchange upgrade trial location
10. The inclusion of MPF and SLU MPF stop sells and withdrawals within the Single Order exchange upgrade trial
11. The timing of the Single Order exchange upgrade trial Stop sell date
12. The changes that will be required to national contracts to reflect the product stop sells in the Single Order exchange upgrade trial
13. How best to share migration plans to ensure minimal disruption on their business and their end customers
14. How best to manage the end customer experience whilst working with Openreach to plan the associated resource required to perform the migrations
15. The implications of the restrictions being proposed
16. Options for end customers if SOTAP will not support a broadband capability required to provide a voice only service
17. How CPs best manage the migration of existing ADSL end customers within the fibre footprint

165. Product Launch information
  18. The need for and specification of proposed the new product variants on GEA-FTTP, SOGEA, SOGFAST and SOTAP
166. Product Stop sell
  19. The application of stop sell restrictions per premises
  20. The proposed stop sell restrictions in relation to allowed/disallowed order journeys
167. Managing migrations
  21. The preferred approach to managing migrations: singly, by exchange, cabinet area, road, customer segment or another approach
168. Meeting end customer needs
  22. Their ability to identify vulnerable end customers, customers with Special Services and proposals for how these customer needs will be met
  23. The need for and specification of a testing facility to test Special Services and edge case customer needs
  24. How the needs of end customers with long term contracts can be met within trial timescales
  25. How the needs of large UK-wide end customers can be met through a migration of lines in trial locations only to single order products
169. Overall trials success criteria
  26. The proposed trial success criteria
170. Trials governance
  27. Openreach's proposed trial governance
  28. How CPs will manage the trial from their perspective
171. Legal and Regulatory Considerations
  29. The Regulatory enablers for the trials
  30. The proposed contract changes and notification timescales

## 13. Glossary

CFPCG	Copper/Fibre Products Commercial group
CLI	Calling Line Identifier
CNI	Critical National Infrastructure
CP	Communications Provider
EPOS	Electronic Point of Sale
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
MDU	Multiple Dwelling Unit (an apartment/flat)
MPF	Metallic Path Facility
NTE	Network Terminating Equipment
OHP	Openreach Handover Point
SMPF	Shared Metallic Path Facility
SLU MPF	Sub-Loop Unbundling Metallic Path Facility
SLU SMPF	Sub-Loop Unbundling Shared Metallic Path Facility
SOGEA	Single Order Generic Ethernet Access
SOGFAST	Single Order G.fast
SOTAP	Single Order Transitional Access Product
TPI	Third Party Integrator
UK	United Kingdom of Great Britain and Northern Ireland
WLR	Wholesale Line Rental
WLR Product(s)	WLR3 analogue, ISDN 2, ISDN 30, SMPF, SLU SMPF, Narrowband Line Share and Classic products