

# Gaining Provider Led Business Switching Industry Process

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## 1 Introduction

To aid various readers with different levels of background knowledge, there are several documents covering the Gaining Provider Led (GPL) Business Switching process (GPLB process):

- **Switching Principles:** documents the main principles associated with the GPLB process.
- ~~Introduction to GPLB: provides a complete introduction to switching under EECC, references to Ofcom consultations and statements, and explanation of concepts.~~
  - ~~Readers who are familiar with the consumer One Touch Switch process will be familiar with most of this. However, the Introduction document has a section outlining the key differences between the consumer and business processes, which may be useful to such readers who are new to business switching.~~
- The One Touch Switch (OTS) process document and best practice guides. This provides an explanation of key concepts and industry background. The OTS process provided the initial starting point for the GPLB design to reduce complexity for Retail Communications Providers offering services to both Businesses and Consumers.
- (This document) **GPLB Industry Process:** this document focuses only on the detail of the Industry Process, and assumes that readers are familiar with relevant terminology and concepts. ~~—if you are not familiar, please start with the Introduction document.~~
- **Industry Process Flows:** diagrams with swim-lanes for customer, GRCP, Hub, LRCP and supply chain. Readers who prefer a visual view of the process will find these diagrams useful.
  - Each step in the in the process flow is numbered with a “BSW” prefix, followed by process flow number and step number, e.g. “BSW1.2” – the same numbering is used in this this Word document.

FCS (federation of communication services) helpfully host the latest version of all documents relevant to GPLB at <https://www.fcs.org.uk/gaining-provider-led-business-switching>

[This purpose of this document is to provide a summary of the industry process.](#)

### 1.1 Scope of GPL Business Switching

This document covers GPL business switching for all sizes of business customers.

The business switching process outlined within this document covers the process steps to follow where the end user is moving from and to a business service/contract. We recognise that there may be instances where, the end user may wish to switch providers and from a consumer to a business contract, or vice versa. The process has not yet been defined to cover these scenarios.

#### 1.1.1 Dual running of services

It is recognised that unlike residential switching, there will be a number of scenarios where a customer may need a period of dual running of ‘old’ and ‘new’ services for a period of time, subject to the customer’s request. This may be for example, to support testing. This raises the question of whether this represents a customer switch or a provide and cease. Where a customer recognises at the outset, that they require a period of parallel running greater than 90 days, it is recommended that these requests are not treated as a switch. It is accepted that unexpected delays may occur within the process, which create delays in practice to extend beyond the 90 days. [The concept of dual running only applies where this is technically feasible. The GPLB process does not seek to create any new requirements upon industry.](#)

Version ~~1.2.00~~

This is version ~~1.2.0~~ of the Gaining Provider Led Business Switching Industry Process [as an initial version for updating following initial industry feedback and consequential design development or clarifications.](#)

The GPLB-SG (GPL Business switching Steering Group) established a Design Drafting Group (with some members from the original consumer OTS-DDG), who have produced this document with input from the Steering Group and OTA2.

### 1.2 Change Log

<b>Version Date Changed By</b>	<b>Reason for change</b>
Initial working drafts Jan - Mar 2023 GPLB-DDG	Initial series of working draft only circulated within the GPLB-DDG.
v1.0 First Draft 31/03/2023 GPLB-DDG	First draft from the GPLB-DDG established by OTA2 and GPLB-SG. This draft will be circulated to industry reps for review and feedback.
<a href="#">V1.1 18/05/2023</a>	<a href="#">Updated documentation following review by industry representatives. Issued to Design group and GPLB Steering Group only</a>
<a href="#">V1.2 &amp; 1.3 05/09/23</a>	<a href="#">Switching dispute information added. SLAs updated and matching elaborated. Issued to Design group</a>
<a href="#">V2.0</a>	<a href="#">Updated service matching guide.</a>

## 2 Overview of GPL business switching process

This section provides an overview of the GPL business switching process, especially for those who may not have read Ofcom's Consultation and Statement documents, or their General Conditions. (Readers are very strongly encouraged to also read those documents.)

The GPL business switching process includes the following high-level steps between the Gaining Retail Communications Provider (GRCP) and the Losing Retail Communications Provider (LRCP). This summary represents a placeholder, whilst the process is reviewed by industry and will be updated to reflect the final process as an executive summary.

Step	Description
<b>Step 1: Customer contacts the gaining provider and provides details</b>	<ul style="list-style-type: none"> <li>The customer contacts their chosen gaining provider (in person, online or by phone) and requests to switch their services.</li> <li>The customer shares their: <ul style="list-style-type: none"> <li>business name;</li> <li>service address and postcode;</li> <li>contact details (where requiring an asset list);</li> <li>losing provider's name</li> <li>account number with losing provider or telephone number.</li> <li>the services they want to switch or requests asset information.</li> </ul> </li> <li>The customer chooses the new services, confirms if they want to keep their phone number(s) <u>(where relevant)</u>, and agrees a switch date. The gaining provider confirms whether any engineer visits are necessary.</li> <li><u>The Gaining Provider submits one or more match requests to the Losing Provider so the gaining provider identifies the correct customer and services can be identified.</u> If this is unsuccessful (i.e. there is no match against the losing provider's records), the gaining provider asks the customer for more details (e.g. losing provider account number, phone number or other identifier of a service to be switched).</li> <li><u>GPL business switching process includes an optional "discovery" step, where the GRCP asks the LRCP to send a list of assets / services directly to the customer. An account number is provided in this scenario to support the correct identification of the services.</u></li> </ul>
<b>Step 2: Losing provider gives customer switching information and customer gives the gaining provider their consent to the switch</b>	<ul style="list-style-type: none"> <li>The losing provider confirms whether they are giving the customer the <del>implications</del> <u>impacts</u> of switching information (e.g. early termination charges, impact on other services) without the need for the customer to request it (recommended). The information is provided, and the losing provider will notify the gaining provider of the method by which the switching information has been sent, so they can tell the customer.</li> <li>In some cases, the customer will already have received this information (e.g. during a tender process), and the LRCP will decide not to duplicate the information.</li> <li>The gaining provider gives the customer information about their new contract.</li> <li>After having the opportunity to consider the information, if the customer is happy to proceed, they give the gaining provider their consent to switch (<del>who the gaining provider</del> retains a record of consent). This can happen in real time during their phone or online conversation.</li> <li>The gaining provider confirms the start date and the services being provided.</li> </ul>
<b>Step 3: Customer's new services begin on agreed date</b>	<ul style="list-style-type: none"> <li><u>Supply chain requests are completed and the Gaining Provider confirms the expected switching date.</u></li> <li>On the agreed date the new services will start and the old services will end. Business customers will have the option for parallel running (where technically feasible), so the cease of the old services may be delayed <u>until requested by the customer</u>. If requested, the customer's phone number is transferred (possibly on a later date than provision of the new IAS).</li> <li><u>The Gaining Provider confirms all activities are completed.</u></li> <li><u>The Losing Provider will ensure Services-services and billing to be ceased in accordance with the switch request.</u></li> <li>Note that early termination charges may apply.</li> </ul>

### 3 Match requests and responses

When reading this document you will see reference to GRCP (Gaining Retail Communications Provider) and LRCP (Losing Retail Communications Provider). Retail CPs are those directly contracting with the customer (now or in future). Each retail CP will need to register and obtain an ID, known as an RCPID, which will allow messages to be directed correctly across the hub.

Retail CPs will interact (via the Hub) using one or more match requests and corresponding match responses. Each match request has several logical elements:

1. Details to match with a business customer recognised by the LRCP.
2. An optional request for the LRCP to send an asset list directly to the customer (where a customer does not have this information).
3. An optional set of one or more services that the customer wishes to switch from the LRCP to GRCP (some services may be ceased with the LRCP in support of a switch of a related service).
4. An optional link to a completed customer letter of authority in support of any porting which would be needed to support switching of NBICS services.
5. An optional previously generated SOR, to which any newly matched services should can be associated with.

The option to request that an asset list is sent by the LRCP directly to the customer is likely to be of use for customers with multiple sites and/or multiple services at a single site. If the GRCP is aware they are dealing with such a customer, they may choose to send a match request for an asset list at the pre-sales stage. It is also feasible that a customer may have a pre-existing asset list (e.g. from an earlier match request via a different GRCP, or as part of the documentation produced by the LRCP during a tender process triggered by the customer).

Customers at the SOHO end of the business market tend to have simple, often single~~ten~~, services, and are much less likely to need an~~s~~ asset list. GRCPs should avoid unnecessary requests for an asset list, as they impose work on the LRCP, and will slow down the sales process for the GRCP.

This document uses the term “customer match” in relation to the LRCP matching a unique business customer.

These details must include at least one “customer identifier” which can be any of:

- An LRCP account number.
- An equivalent of account number used by the LRCP, e.g. a unique customer username or similar used on their customer facing portals.
- A DN (directory number) for a voice service with the LRCP – this is required when the customer wishes to retain that number when switching NBICS services, and could be provided as identification even where the customer wants that NBICS service to be ceased when a related IAS is to be switched.

In order to complete a successful match a customer identifier must be provided along with the business name and business address as well the current provider that the customer wishes to switch from.

This document uses the term “service match” in relation to matching services which the customer wishes to switch. The services can be matched by inference (e.g. the customer match was to a SOHO customer with a single IAS service) or explicitly (i.e. with a matching unique service identifier, e.g. taken from an asset list).

The GRCP may send multiple service match requests, e.g. one per site for a multi-site customer. The LRCP will generate a fresh SOR for the first successful service match request. If the GRCP includes the SOR in subsequent service match requests, the LRCP will add any successful service matches to their record of which services are associated with that SOR.

A detailed matrix has been created [GBLB Match-Request-Response-Scenarios document] which outlines which combination of data elements will result in a successful match and which response codes should be used in the event of an unsuccessful match. A summary of the successful match scenarios can be summarised as follows:

- One very strong non-public identifier and one further item are fully matched, or;
- Where no strong items/ identifiers in the public domain are provided 3 matching elements need to successfully be matched.

- No negative matches for example an incorrect asset, or an address which is not associated with the customer, although certain partial matches may be permitted.
- The UPRN will be treated as equivalent to address where they match. Although a mismatch is not treated the same as a negative match. This is due to the differing nature of UPRNs. Not all LRCPs use UPRNs and where this is the case an actual address should be provided by the GRCP. If a UPRN is presented, then as long as the postcode and post town is also a match, the losing provider can consider the address a match without having to compare the address line by line. The losing provider may choose to complete a full comparison, if more appropriate for the way they manage addresses.
- Identity of LRCP must match.  
Business name – mandatory (includes a level of fuzzy matching to prevent rejections such as Ltd. Vs Limited, i.e., doesn't have to be an exact match). Where a strong identifier and one other item is successfully provided and matched an error in the business name may be permitted.  
Any address which links to the customer directly (billing / site) is permitted where you intend to provide a service identifier. Note where no service identifier is present the address needs to match the service location otherwise this will cause a subsequent rejection when a service match is attempted.  
 BSW1.2 Customer contacts GRCP via sales channel

Capturing the information needed for a match request should **not** be the first step for a gaining retail provider. Retail CPs are encouraged to create sales processes that allow customers to explore the available options when considering switching, and only start the matching process when there is some indication that the customer wants to explore the full impacts of switching. This will minimise the load placed on losing retail providers and reduce concerns of annoying customers by sending them multiple implications-multiple notifications of switching information about switching and potential impacts.

### 3.1 Match request and response

For the SOHO end of the business market, matching may take place in the “checkout” stage of a simple order journey (very similar to the consumer OTS process). Further up the business market, matching may take place during a pre-sales stage.

The overall matching step of the business process is when the customer contacts the gaining retail provider and provides details which can be used to consult the losing retail provider<sup>1</sup> (via the Hub). Matching serves two purposes, either to match the business customer and to request the LRCP send an asset list to the customer or to match the customer and match services at the same time.

Throughout this document we refer to the interactions between the GRCP and LRCP at this overall step as the “match request” and “match response”. This section takes the reader through the steps in sequence, to establish an understanding of the main process flow.

Once a request has been submitted it is expected that the LRCP provides a match response by the end of the second full working day following receipt from the GRCP.

Where an end user wants to switch services from two different providers to one new provider, the gaining provider will need to submit a separate match request to each losing provider.

Additional matches may also be required in a multiple location switch scenario where no asset identifiers are available as only one address is provided for the initial match. Some businesses with complex corporate structures may also require multiple match requests, such as where services to be switched are linked to different business accounts within a Group of companies.

### 3.2 BSW1.4 Gaining retail provider takes details

If the customer advises that they wish to switch, the gaining retail provider will need to follow a matching process via the Hub with the losing retail provider. There are several key pieces of information needed to attempt an initial customer match:

- Identity of the losing provider.
- The business name or sole trader name.
- Customer address – which should be linked to a service.
- And at least one of the two following items:

<sup>1</sup> This document uses the term “losing retail provider” to refer to the RCP who would be the LRCP if a switch order were to be placed, and only uses the term “current retail provider” where it makes linguistic sense (e.g. the phrase “the customer will not know the RCPID of their current retail provider” reads more easily than “... the RCPID of their losing retail provider”).



- The telephone number (not presentation number) of a service currently active with the LRCP.
- A customer reference used with the losing retail provider ([§3.3.1 below](#)[3.3.1 below](#)[3.4.2 below](#) gives examples of identifiers the LRCP might recognise.

If the customer already knows what services are to be switched and is ready to proceed, details of the service to be switched should also be captured to allow for a service match. If such details are not known to the customer, then a match request for an asset list would be appropriate.

There is other optional information that can be provided, such as contact details of the requestor of an asset list – these are covered in detail in relevant sub-sections below.

At this point the GRCP ~~is also gaining~~should also gain the customer's consent-permission to interact with the LRCP (via the Hub) to either request an asset list or to attempt a match of one or more services with the LRCP

### 3.2.1 Identity of the losing retail provider

This is a key piece of information to attempt a match – without this, the Hub would not know where to route the match request. The end user should be asked for the Communication Provider's name on the bill. Where the customer has services from two providers both should be captured and a separate switch~~the~~ process followed for each provider.

The Hub will publish a regularly updated list of RCPIDs and corresponding RCP brand name(s) ("name on the bill"). RCPs will download this list on e.g. a daily basis, and will then cache that download for use in their sales systems.

Many RCPs have both consumer and business brands, but consumer customers are not necessarily aware of the business brand. Some RCPs share a brand name between business and consumer, and other RCPs have more distinct brand names.

When the gaining provider captures and attempts to match information about the current provider, care should be taken to select the correct RCPID.

### 3.3 Business name

The gaining provider must capture the business name as held by the losing provider. This field is mandatory.

Note that the business name held by the losing provider may differ from the current business name. For example, a company may have been bought out by another company. The GRCP is expected to interact with the customer to capture the business name as held by the LRCP. This doesn't prevent the new provider from recording an updated name within their own systems, but a failure will occur for this match element and a rematch may be necessary if the name does not match that held by the LRCP. Alternatively, the customer would need to contact their current provider to correct and out of date / erroneous information which may take longer to complete. As a good practice the GRCP should ask the customer for the name of the company as it appears on the bill from the LRCP.

Fuzzy matching logic is also expected to be applied on the business name. For example, if 'Ben's Bread Limited' is on the LRCP's system but a match request is raised for 'Bens Bread Ltd', this should not be rejected. Equally, if Mr C Hip is listed on the current provider's system but a match is requested for Mr Charlie Adam Hip on the match request this would be considered an acceptable match.

In general, business name matching should be based on the "legal entity" name. ~~E.g. ff~~ For a sole trader, the legal entity is the individual, even if they also use a "trading as" name. Where the GRCP captures and the LRCP holds the name of the sole trader, this should be a successful match, even if one or other have also captured / also hold the "trading as" name.

For large complex corporate customers, the customer may have multiple addresses associated with the account. The services to be switched may also be linked to multiple addresses. For the customer match – only one address should be provided. The key is that the address must be associated with the named entity wanting to switch. If you do not have asset identifiers the customer address provided will be the default service address in a subsequent service match.

Customer Address

The gaining retail provider will need to capture the customer address as held with the losing retail provider. In most cases, this should be the same address as where the gaining retail provider is expecting to provide service. Where services provided have no fixed location, for example VoIP, it may be appropriate to provide the head office address if that address is associated with the service.

The customer address is mandatory to complete a successful match. ~~The LRCP should match the address if it only differs in formatting, but will reject the match if the address is substantially different. Some address tolerances are permitted in some match scenarios. The GPLB Match-Request-Response-Scenarios document should be reviewed for each scenario.~~

In order to support successful matches, the gaining retail provider should submit the address of a good quality, with full post town and post code, and other address lines formatted as per Royal Mail's PAF guidelines. (Refer to Appendix III).

### 3.3.1 Customer reference with the losing provider

For GPL business switching, the provision of the customer reference

is only mandatory where a telephone number (being taken as a service) is not provided.

It is assumed that all RCPs have the concept of an account number or customer reference<sup>2</sup> (even if they use terms such as "customer id"). Most RCPs ask customers to treat this value with some confidence, and use it as one element of their caller validation processes. Some RCPs do not have the concept of an account number, and instead have concepts such as a username or similar used in a customer online portal – as long as such values uniquely identify a single business customer, they are valid to be used as a customer reference for matching. ~~Some retail CPs are also considering providing end customers with a proxy for a Customer reference number to support switching. This should be used in the same way that a customer reference or account number is used.~~

Customer reference details are particularly needed in instances where the customer has data only Internet Access Services such as FTTP. In these instances, the customer reference will provide a ~~second~~ strong data point to support the match and accurate customer verification.

In a business context, there is sometimes a hierarchy of accounts, e.g. accounts for individual services or sites feeding into a master account. Each LRCP will decide its own policy as to which account number is needed for a successful match, e.g. they may support matching using both the low-level account number and the master account number, if their customers are aware of both account numbers and could reasonably quote either. LRCPs should not impose a policy that Ofcom might view as unnecessarily restrictive.

Where a match is being undertaken to match the customer and request an asset list only, you will need to ~~request provide the all~~ account references directly associated with ~~those services or all addresses~~ the account which the asset list relates to. ~~Should you require asset lists for multiple accounts, additional customer match requests will be needed providing the account reference for each separate account.~~

Note throughout this document we may refer to customer reference, account number or account reference. All used with the same meaning as described in this section.

### 3.3.2 Telephone number of an active service

For GPL business switching, the provision of the telephone number is only mandatory where a customer reference or an IAS service identifier is not provided. It is recognised that many business customers may not have their account details to hand when talking to the GRCP. By providing a telephone number associated with a service, it provides a simple alternative to enable a match. This telephone number does not need to be the service which will be subject to the switch and is for verification only.

In this context the telephone number is a number which has been assigned to the customer for their use of Number-based Interpersonal Communications Services. The telephone number should not be a mobile number nor a presentation number.

<sup>2</sup> The format of account number or reference varies between RCPs. E.g. BT account references are two letters followed by eight numbers, and are commonly termed the "account number" even though they are not purely numeric. The Ofcom consultation and statement exclusively used the term "account number". References in this document to "account number" do not imply a purely numeric value.

### 3.4 Match of services to be switched

Within this stage of the match request, the customer may also know which services they wish to be subject to a switch request. If known, the service details can be provided as part of the match request. If these details are not yet known, a match against the services can subsequently be completed, following a successful match of the business customer.

The Ofcom documents (and the original industry submissions) mostly refer to the “services to be switched”. However, this Industry Process more accurately acknowledges that voice might be ceased instead of being switched.

The general switching rules in the revised General Conditions apply only to Internet Access Service (IAS) and Number-based Interpersonal Communications Service (NBICS) (more commonly referred to as “broadband”<sup>3</sup> and “voice”). In many networks, the broadband and voice are technically linked. Even where not technically linked, they are often strongly linked by contracts and bundles.

To Perform a Service match the following information is required:

- The service identifier (e.g. The telephone number or other Asset ID that the losing provider will recognise). This field is optional for IAS but is mandatory for NBICS.
- The type of service (NBICS or IAS) Mandatory. Some legacy products have both data and voice (e.g. FTTC) in this instance the line is directly linked to the CLI (voice) element and this should be used for matching purposes.
- The address associated with the service. This **field-information may-will** be required to locate a service where no service identifier has been provided, no NBICS **is associated to the service** or in a multisite scenario.
- The GRCP also needs to specify the action the losing provider is asked to take with the service specified. Valid values are **cease (where the customer no longer requires the existing service) and port (the port action covers all scenarios by which the customer may move their number to the GRCP).**

Where a port is involved, it is also possible to provide an optional link to a customer letter of authority (CLOA). By providing the porting CLOA through this process, it is expected that this will support a more efficient porting journey.

#### 3.4.1 Multiple services to be switched

In business switching it is not uncommon for more than one service to be switched at the same time. Once the customer match has been confirmed multiple services can be matched during the switching process. The service matches can be completed in one go, or over time, up to 6 months from the date that the customer Switch order reference is generated following a successful Customer match.

Where a customer wishes to switch a continuous range of telephone numbers for example 0161123456 to 0161123476 these can be completed in one match by entering into the service identifier field the start of the last in the number range with a hyphen between e.g. 0161123456-0161123476. A range should only be used if all numbers are consecutive. For efficiency purposes these should be raised as one request rather than individually. If the numbers are not consecutive separate service matches are required.

Multiple customer and service matches may also be required for each customer where:

- There is more than one LRCP linked to the services to be switched.
- If there is more than one location, and the IAS asset identifier is unknown.
- If the customer’s services are linked with multiple account numbers and an asset list is required for specific accounts.

### 3.5 Decision point: does the customer have all the service identifiers they need to switch?

The GPL business switching process thus has ~~an~~ an **optional** step to request the LRCP to send the customer a list of all of their services to support switching. The list would contain the service identifiers needed for a subsequent match request to specify the services to be switched / ceased, but should also contain information on each service recognisable to the customer (e.g. identification information that the customer sees on their bill) and importantly what an LRCP would recognise when a service match request is submitted.

### 3.6 BSW 1.5 Gaining retail provider sends asset list request to LRCP

This is an **optional** step as described above.

GRCPs should only send this type of request if **absolutely necessary**. E.g. for a SOHO customer with only one IAS service, or a small customer with several services wanting to switch them, or a customer with knowledge of their service identifiers, requesting an asset list would be an unnecessary step, creating extra work for the LRCP, and delaying the sales process for the GRCP.

When requesting an asset list the GRCP should indicate within the match request the type of asset list required whether the asset list is only for services linked to the associated account contained within the match, or all assets linked to the ~~There are four options that can be selected when requesting assets these include: customer-~~

1. All services at address irrespective of the account. This is a request for information about all IAS and NBICS services associated with the address, belonging to the LRCP included as part of the match.
2. All services linked to account reference irrespective of address. This is a request for information that relates to all IAS and NBICS services associated to the account reference included as part of the match, irrespective of the location provided as part of the match.
3. All services for that account and address. This is a request for information about all IAS and NBICS services associated both at the same address and linked to the same account reference provided as part of the match.
4. All services for that customer irrespective of address or account. This is a request for information about all IAS and NBICS services. This may be applicable for large corporations which have multiple sites and multiple accounts with the LRCP. The details within the customer match should be used by the LRCP to identify the target customer and associated services.

As previously described in section 3.3.1 different providers may associate account numbers to services in different ways. Some LRCPs may use customer account numbers or customer references differently.

GRCPs should be mindful of these differences when placing an asset list request. Examples are provided in 6.6 Appendix V to assist understanding.

The requestor name must be included in any asset list request. It is also good practice to capture the role of requestor to support with potential queries.

### **3.7 Hub logs request and routes to the Gaining or Losing retail provider**

The Hub will log the messages (for audit trail purposes) and route the request to an end point as defined by the RCP that owns the losing retail provider RCPID. This step is repeated through-out the process, we have listed once for awareness.

### **3.8 BSW1.10 Losing retail provider sends asset list to the customer following successful customer match.**

If the LRCP finds a single matching customer, they will send an asset list to the customer where an asset list has been requested. The asset list should be sent using the registered contact details the LRCP holds. As Retail CPs assign and capture contacts differently e.g. some record primary contacts, some people are listed as billing contacts, others as commercial contracts, it will down to the LRCP to determine which is the appropriate contact to send the asset list across to. If the requestor is both a recorded and appropriate contact, it will help the LRCP determine more quickly where the asset list should be sent, for large organisations with multiple contacts.

We are not prescribing what format the asset list should take. As a minimum the asset list should include:

- An Asset Identifier (something the losing provider will recognise for a specific service)
- Service description (Something the customer should recognise related to the service)

The LRCP must state who requested the asset list when sending the list out. This will help to ensure that the asset list is issued to the correct party. This will also help to prevent queries where a Business Customer contact did not expect to receive a list.

The LRCP may choose to provide other information (whether the service is in a fixed contract period, or where services are linked and where the removal of 1 service impacts another). Any additional information needs to be fact based and neutral and should not create any disincentives to switch. Nothing prohibits the provider from issuing a complete list of assets for the end user if it is easier to do so. An example is provided below.

Asset List **\*\*\*ILLUSTRATION PURPOSES ONLY\*\*\*\*\***

Account Name Ben's Bread Factory Ltd.  
 Account Number ABC12345/AAS  
 Requestor: Mr B Bee

Service Type	Our Reference	Site Address	Other Information
Voice	01234 699123	35 The Avenue, Southampton, SO99 9XX	
Voice	01234 654000 to 01234 654999	35 The Avenue, Southampton, SO99 9XX	DDI Number range
Voice	03661 256500		Non geographic (presentation number)
Voice	01234 699123	35 The Avenue, Southampton, SO99 9XX	Main Billing Number
Internet Access	FB16549	123 Highstreet, Manchester M12 3ZZ	1GB Internet Access Service
Internet Access	BK68943	123 Highstreet, Manchester M12 3ZZ	4G Backup Service
Internet Access	XX13595	123 Highstreet, Manchester M12 3ZZ	Network Reference ONT ABC13246RT4560 Port 1
Internet Access	12A6DA4F650E	123 Highstreet, Manchester M12 3ZZ	MAC Address/Serial Number 12:A6:DA:4F:65:0E

If the LRCP receives repeat requests for asset lists, these should be assessed and a decision made by the LRCP as to whether a new asset list is required or the last one generated can be resent if needed, i.e. there has been no changes to the customers assets to warrant a new one or in instance of rate limiting. The LRCP should advise where an asset list will not be required.

??The LRCP has a maximum of 2 complete working days to issue the asset list. For example, where received on lunchtime on Monday this would need to be issued by close of business Wednesday. Further details have been provided within the [6.3 Appendix regarding both SLAs and response times.](#)

### 3.9 BSW1.18 LRCP creates successful match response to GRCP.

If the LRCP finds a single matching customer, they will also create a success response for the GRCP, including information on how the asset list will be sent to the customer (e.g. email / letter), if requested.

Method	Additional information
Email	Masked email address: first few characters of "username" element and full "domain" element, all other characters replaced with *. The number of unmasked characters should be no more than 50% of the entire username or 3, whichever is smaller, e.g: nia*****@gmail.com da**@daves-domain.com
1 <sup>st</sup> Class Post	A first class letter will be sent to the contact/billing address as held by the LRCP and there is no need for any additional information to be included in the response.
2 <sup>nd</sup> class post	A second class letter will be sent to the contact/billing address as held by the LRCP and there is no need for any additional information to be included in the response.

#### 3.9.1 BSW1.18 Generation of Switch Order Reference (SOR) by losing retail provider

If the LRCP finds a match, they need to generate and include a Switch Order Reference (SOR) in the response. The SOR will be a UUID as defined by IETF RFC4122 [draft-ietf-uuidrev-rfc4122bis-02 - A Universally Unique Identifier \(UUID\) URN Namespace.](#)

Note that an SOR will expire after 6 months from the date of generation.

### 3.10 BSW1.15 LRCP creates an error response to GRCP

If the LRCP does not find a matching customer, they will return a match failure-response with an indication of failure. The failures (and possible GRCP responses) could be:

- Customer reference number not found (or found as closed account, or with no IAS or NBICS).
  - The GRCP could check that the customer has provided the correct LRCP and account number.
- Telephone number does not match.
  - The GRCP could check that the customer has provided the correct telephone number.
- No match on business name.
  - The GRCP could check that the customer has provided the business name as held by the LRCP.
- Location not found or does not match.
  - E.g. the address does not match.

The full list of error codes ~~will be provided within the developer's are provided separately in the GBLB Match-Request-Response-Scenarios~~ document.

Note that if the request includes information to match to find customer services, but the address is not a close enough match, this would ~~be considered typically result in~~ an unsuccessful match.

### 3.11 BSW1.13 Customer receives asset list and request GRCP to match services

When the customer receives the asset list, they will contact the GRCP, who can attempt to match services to be switched against using the details passed on by the customer.

### 3.12 BSW1.14 Gaining retail provider sends (additional) service match request to Hub

Following the successful customer match the gaining retail provider will be able to make additional service match requests against the SOR. Each time a Service match request is made the following information is required:

- The service identifier (e.g. The telephone number or other Asset ID that the losing provider will recognise). This field is optional for IAS but is mandatory for NBICS.
- The type of service (NBICS, NBICS Range or IAS) is Mandatory. Some legacy products have both data and voice (e.g. FTTC) in this instance the line is directly linked to the CLI (voice) element and this should be used for matching purposes.
- ~~The address associated with the service. This field~~ Address information may be required to locate a service where no service identifier has been provided, no NBICS or in a multisite scenario. In these instances, the address used in the customer match associated with the Switch Order Reference Number will be used.

### 3.13 BSW1.7 Losing retail provider processes service match request

The losing retail provider will receive the match request from the Hub and will attempt to find a match. The algorithm adopted by the losing retail provider will have the following elements:

- Are the services linked to the quoted address?
- Are the services associated with the customer matched?
- Are the services live?

A customer match is required for service matches to be progressed. The customer match may be simultaneous, but a customer match cannot follow a service match. The Customer match allows the Switch Order Reference to be generated and followed by Service match if asset lists are needed.

A Match response should be provided for each service request. This may result in a scenario where some service matches have been successful and some fail.

Note that the LRCP does not need to search for any former customers with former services at that location.

### 3.14 BSW1.15 Losing retail provider replies with failure to match (service)

A response will be provided for each service match request. Any services which cannot be matched will return a match response with an indication of failure (~~1.8~~). The failures (and possible GRCP responses) could be:

- SOR not found or expired.
  - The GRCP could recomplete a customer match and generate a new SOR.

- No services **found** on the account **or** at that location.
- A switch is currently in progress (i.e. LRCP has an open switch order).
  - Note that this could arise when a customer has cancelled another switch order with another GRCP<sup>4</sup>, but the cancellation has not yet reached / been processed by the LRCP.
- Range error
  - The telephone number range provided includes additional numbers, for services that the customer is not responsible for.
- Customer is not responsible for the services within the match request.
- The service is not unique.
- The service is already switching with a current switch order.

Where multiple service match requests have been made, a response will be individually provided for each service match requested. It is therefore possible that where multiple services matches are submitted at the same time, some matches could be unsuccessful and some successful. The switch can still be progressed for individual services, which were successfully matched.

### 3.15 BSW1.17 Gaining retail provider receives failed match response

The gaining retail provider will inform the customer of the failed response and may attempt to resolve the non-match.

Resolutions could include:

- Correction to information already provided, such as correction of spelling of business name to match the variant held by the LRCP.
- Addition of extra information, such as additional service identifiers.

If the GRCP is able to correct or add information, they would send a fresh match request to the Hub using the SOR from the customer match.

### 3.16 BSW1.18 Losing retail provider finds a service match

If the losing retail provider finds the customer service listed within the match, associated with the correct business, and where provided at the correct address the losing retail provider should return a positive match response to the gaining retail provider (via the Hub). There are several key pieces of information that the losing retail CP must include in the response message that it generates to be sent to the GRCP:

- List of impacted services (this will include every service that have been queried in the match. In addition, where a strongly related service is directly impacted but did not form part of the service match, this must also be returned in the match response. For example, the LRCP has identified a service that was not requested to be ceased but will be automatically ceased if the switch is progressed. This would happen when switching a WLR voice line to another network provider would result in the forced cessation of an IAS service provided over the same copper line.
- Whether or not switching information has been sent to the customer from the LRCP – mandatory.
- Details about the services to be switched.

If sent, method of communication to customer of the switching information – mandatory.

RCPs who consume Openreach services are expected to be aware of the interdependencies, especially between copper-based services, such as WLR, MPF, ADSL and FTTC.

<sup>4</sup> Or even with the same GRCP – e.g. the GRCP has encountered a failure on its original order and has issued a replacement order on behalf of their customer, but has not allowed enough time for the first order to be fully cancelled at the LRCP.

### 3.16.1 BSW1.8 Supply chain provision of information to support LRCP

The LRCP may need to invoke query services<sup>5</sup> provided by their supply chain. Notable examples include:

- Mapping from a supply chain service identifier (e.g. the identifier used by a wholesaler CP and known to the LRCP) to a service identifier used by the underlying network provider (and an indication of the network provider in supply chains where the LRCP does already know this information).
- The CUPID of the current Voice Communications Provider should be provided where available to support porting.
- WLR operators with no record of broadband service will need to invoke Openreach's EMLC service to check if there is broadband on the line, perhaps with a different CP<sup>6</sup>.

It is also open to RCPs to work with their supply chains to do bulk updates to their service asset information to add (or refresh) the above information, so that they do not need to rely on real-time responses from their supply chain. Refer also to rate limiting<sup>5</sup>.

Supply chain service identifier details include:

• Access provider – May also be known as the infrastructure provider or network provider – it is the most upstream CP that owns the “kit in the ground”, e.g. Openreach, Virgin, full-fibre alt-net. Sky and TalkTalk are both voice operators, but where they use an underlying Openreach MPF service, so Openreach would be the correct access provider. Some LRCPs may need to query their supply chain to obtain this information.

- For IAS, there will always be a physical access provider, so the ACPID is mandatory.
- For NBICS, there may or may not be a physical access provider. For a VoIP NBICS, the physical network supports the IAS, and the VoIP runs over the IAS. We will define an ACPID to represent a generic VoIP access, so that this field can be positively populated with a recognised value (rather than just left blank and looking like missing data).

o The network/access provider will be represented by a new identifier mastered by TOTSCO

• Access provider service identifier type and value – mandatory for some access providers, e.g. Openreach. If the GRCP uses the same access provider, they will be able to place an order with their supply chain targeting the existing infrastructure for transfer. This helps targeting the correct existing infrastructure and helps avoid erroneous transfers.

- Some RCPs will know a service identifier used by the access provider (e.g. an ALID used by Openreach).
- Other RCPs may need to query their supply chain (e.g. if they use a wholesaler, and that wholesaler exposes their own service identifier, e.g. TalkTalk expose a “CASR ref” to their retail CPs, and do not expose the LLU ServiceId or ALID used by Openreach).
- Some access providers support a number of types of service identifier, e.g. Openreach support DN, Partial DN, ALID and ONT Reference + port number. If the access provider supports different types, it is mandatory for the LRCP to return both the value and the type.

Please also refer to the One Touch Switch Industry Process document appendices “Specific Details for Openreach” for further information about Openreach asset identifiers.

### 3.16.2 BSW1.18 Method of communication to customer of the switching information from the LRCP

Under Ofcom General Conditions of Entitlement the Gaining and Losing Providers must keep the customer informed throughout the switching process. For ~~businessconsumer~~ like ~~business-consumer~~ customers, the ~~implications-impacts~~ of switching are likely to be needed to support informed consent to proceed with a sale.

The LRCP may choose to send the switching information by multiple methods and should indicate durable mediums used. E.g. if the full information is sent by letter, and the LRCP chooses to also send an SMS message advising only that an important letter is on its way (but the SMS does not replicate all the switching information), then letter is the only means which should be reported.

<sup>5</sup> Openreach term these as “dialogue services”, but other network/access providers may not use this terminology<sup>23</sup> Openreach EMLC service returns the CP who is directly paying for the broadband service (e.g. BT Wholesale), and do not expose the RID of the retail CP. Hence the intentional use of “CP” rather than “RCP” in this paragraph

<sup>6</sup> Openreach EMLC service returns the CP who is directly paying for the broadband service (e.g. BT Wholesale), and do not expose the RID of the retail CP. Hence the intentional use of “CP” rather than “RCP” in this paragraph.



Additional information must be provided alongside each method as follows:

Method	Additional information
Email	Masked email address: first few characters of “username” element and full “domain” element, all other characters replaced with *. The number of unmasked characters should be no more than 50% of the entire username or 3, whichever is smaller, e.g: nia*****@gmail.com <a href="mailto:da**@daves-domain.com">da**@daves-domain.com</a>
SMS	Masked mobile number: If the LRCP stores the SMS number in UK format, first and last three digits, all other digits replaced with *, e.g: 078*****713 If the LRCP supports SMS numbers in international format, the country code and first two significant digits after country code should not be masked, e.g: UK example: +4478*****713 ROI example: +35387*****915 or (an alternative is +3538*****915 if easier to implement) US example: +160*****576 The masked number may optionally include spaces (which should not be replaced with *) and (0) <sup>7</sup> , e.g. +44 (0) 78** ***713
2 <sup>nd</sup> class post or 1 <sup>st</sup> Class Post	Note that the method will not be just “Letter” – instead it will indicate the type of delivery method (helping the GRCP / customer to understand the likely arrival date). The letter will be sent to the contact/billing address as held by the LRCP and there is no need for any additional information to be included in the response.
Not Issued	This is to be used if, for whatever reason, the impacts of switching were not issued.

GRCPs must be able to handle a potential list and advise the customer which methods have been used.

### 3.17 BSW1.19 Losing retail provider sends switching information to their customer

Where Switching information is sent to the customer, it should include as a minimum; that a switching match has been made, which services are ~~to~~ being matched which if progressed, will be switched away and any early terminations charges. It is also considered best practice to highlight where other associated services may be impacted; for example, static IPs, linked software, or battery back-up.

The losing retail provider will send the switching information directly to their customer. If the provider holds an email address for the customer (and the customer has not previously asked for all future communications by letter), the provider will send an email communication to their customers. The losing provider should ensure that this email is sent without any un-necessary delay.

If the provider does not hold an email address (or the customer has previously opted out of email communication), the provider will send a letter using their print and dispatch mechanisms [or other appropriate means](#).

If the customer doesn’t receive their switching information from the losing retail provider, the customer can contact the losing retail provider to update their contact details, and ask for the switching information to be re-sent to the new contact details.

#### 3.17.1 Rate Limiting

There is a legitimate worry about whether a malicious actor could use (maybe multiple) GRCP sales journeys to trigger dispatch of multiple switching information, or asset list requests, with the intent of causing nuisance to an individual, or of causing embarrassment to the UK telecoms industry [\(including Ofcom\)](#).

This industry process permits LRCP to “rate limit” their dispatch of notifications with switching information, triggered by successful match requests. This may be applied when the switching information would not be materially different from previously sent information within a 31-day period.

If a RCP decides to implement a rate limit, in their match response, they should indicate the date of last dispatch of switching information, where the current request will be suppressed by the rate limiting. Rate limiting is optional for the LRCP.

The principle of rate limiting also applied to asset list production.

### **3.18 Disputed Switches**

1. There may be instances where the LRCP may be contacted by their end customer to dispute the validity of a switch.

Scenarios have been provided of when this may occur in Appendix IV. Examples include;

- a) A taxi company 'minor partner' is attempting to switch the services and set up in the account in their name following a breakdown in partnership.
- b) A school arranges a switch to a new GRCP without realising that a broader council contract is in place with authority over which provider is used. If the school changes providers significant penalties would arise for the council.
- c) A company has gone into liquidation and a party approaches a new provider to switch the service/services.

If a customer contacts the LRCP they should firstly explore with the customer to understand their specific situation and the nature of the dispute. Where appropriate the LRCP should understand if the customer has attempted to resolve the switching dispute with the Gaining Retail CP directly. The LRCP may raise a message to dispute a switch with the GRCP in order to flag an issue with the validity of a switch if any of the following applies:

- a) The LRCP is comfortable that the end customer has exhausted attempts to resolve the issues with the GRCP directly, for example where the end customer disputes a sale or consent being given, or,
- b) Cancellation action has not been taken following a reasonable period or after multiple requests.
- c) The customer has no relationship with the GRCP in instances, for example, where a business partnership has broken down. Note that if a different colleague without the same group initiated the switch, this should be addressed internally by the end user and direct contact with the GRCP.
- d) Erroneous transfer.

The switching dispute is not intended to be permanent or enduring but allows time for either the GRCP to investigate or for the dispute to be resolved.

**Note:** The LRCP must not use this functionality to frustrate the process, any evidence of a LRCP doing this, may result in Ofcom investigation. See also Dispute notes.

#### **3.18.1 Initiating a Switch Dispute**

A switching dispute of the GPLB process can be initiated after a successful match request has been made and prior to the switch date.

A dispute is raised via the messaging facility. As such it should be clear that messaging may not prevent further action from happening as all downstream activities still need to be managed by the GRCP.

The LRCP should raise 'Business Switch Notification' including the following information to ensure the GRCP is clear on the action needed:

- The Switch Order Reference -this is required to allow the GRCP to identify the disputed switch.
- Define the nature of the message under action "dispute-hold".
- Define the "severity" level of the message. "Urgent" should be selected if the switch date has been set. This will trigger an immediate review.
- It is also best practice to provide additional information within the body of the "message" so that the GRCP is aware of both the reason for the dispute to aid their enquiries and to provide a contact within the LRCP organisation to support resolution. E.g. email address or phone number. Additional opportunity to message if the impact relates to some or all of the services linked to a SOR.
- The message should include one of the following reason codes:
  - Failure to Cancel
  - No contact with GRCP

- o Disputed ownership.

Note: The LRCP raises the dispute at the Switch Order Reference Level.

### **3.18.2 GRCP Actions in response to a Switch Dispute**

Any urgent dispute messages should under best practice guidelines be reviewed within 4 working hours.

The GRCP should assess:

- Where the switch is up to in the switching journey
- Assess how immediately the switch is due to take place.
- Seek to understand the nature of the dispute.
- Determine whether immediate action is needed to delay the switch date to allow sufficient time for the dispute to be investigated. This includes actions needed to prevent a port request progressing.
- Based upon the information available including that provided in the messaging, complete an investigation to determine whether the customer had the right to request the switch, or not, and whether the correct information / service details are held. It may be necessary to contact the customer to resolve.
- Determine on the basis of the investigation to proceed with, or cancel the switch. If a legal dispute is likely to be protracted, contact the LRCP with a progress update.
- Message the LRCP to acknowledge receipt of the dispute with a "Dispute Update" message referencing in the body of the message the SOR and 'Acknowledged'. If there is no response the LRCP may need to make alternative attempts to contact the GRCP if the switch is imminent.
- Message the LRCP with the outcome of the investigation using "Dispute Update" in the messaging type, provide a severity ("Urgent" or "Information") and an update within the body of the message. "Information" may be selected in instances where an urgent response is not required.

### ~~3.17.2~~

### **3.18.3 Releasing a Dispute**

Update messages can continue to be used between the GRCP and LRCP until the dispute is concluded. This may result in a switch being cancelled by the GRCP or the LRCP may receive sufficient confirmation of authority to close the dispute. Ultimately some disputes may go to ADR or legal action may be required to resolve. In these instances, it may be necessary for the GRCP to cancel a switch until the matter has been resolved.

If the dispute is successfully resolved, the LRCP should send a final message to the GRCP using the Business Switch Notification again. The message should include:

The Switch Order Reference

An action description "dispute-resolved",

An indication of message severity ("Urgent" or "Information")

With a message comment.

### **3.18.4 Dispute Notes**

The LRCP, GRCP and customer should collaborate to resolve errors or omissions. Working in partnership to resolve disputes prevents a switch proceeding that then requires subsequent restoration of services or a contract which is then not paid. This works to the benefit of all parties to prevent services needing to be restored or unenforceable contracts.

It is not appropriate to raise a dispute in the following circumstances, including but not limited to :

- As a result of financial implications, the customer may have been unaware of,
- The customer changing their mind,
- Quality issues driven by the GRCP such as placing an order for the wrong service,
- In response to retention activity.

- Where the end Customer needs to engage with a different part of their Corporate Group or entity, who have initiated the switch without realising impacts on a master agreement. In this instance the end Customer should contact their colleague and arrange to cancel the switch with the GRCP.

Reasons when a dispute is appropriate to raise is listed in 3.19.

### **3.183.19 BSW1.23 Gaining retail provider obtains Express Consent**

After getting a successful match response, the gaining retail provider can proceed with the rest of their sales process. They must obtain the customer's express consent before they can submit a switch order to the Hub (and corresponding processes with their supply chain).

In the General Conditions, Ofcom define express consent as:

'Express Consent' means the express agreement of a **Customer** to contract with a **Communications Provider**, or to transfer their **Public Electronic Communications Service(s)** or port their **Telephone Number(s)**, where the **Communications Provider** has obtained such consent in a manner which has enabled the **Customer** to make an informed choice;

Supply chain orders should not be submitted until express consent is obtained.

### **3.193.20 BSW1.26 Gaining retail provider places order**

After gaining and recording express consent from the customer, the gaining retail provider will complete any steps required for their own order that have not yet been completed. This includes agreeing a migration date with the customer:

- The customer may want a delay, e.g. to line up with the end of a commitment period with the LRCP.
- The provision of service via the GRCP's supply chain may have a lead time.
- The provision of service may require an engineering appointment, and if this is for a customer facing visit, the customer will need to pick an available slot when they can arrange to be at home.
- The gaining supply chain may use a model where they reply with a committed date<sup>8</sup>, and any date quoted to the customer at the point of sale is aspirational.

For many RCPS, at this point the sales order is "submitted".

### **3.203.21 BSW1.27 Customer receives order confirmation from GRCP**

The step represents the receipt by the customer of all the information sent by the GRCP after the customer gives their express consent to the switch, and the GRCP starts processing their "customer order".

## 4 BSW1.30 Raise Switch Order Request

In the previous section a customer order has been captured and submitted. For many RCPs this represents a transition from order capture to order processing.

A “customer order” in a typical RCP’s systems will result in multiple “supplier orders”, including:

- One or more orders into the RCP’s supply chain. in order for delivery of equipment, such any hub/router needed for broadband access.
- An order to set up the customer and their services on the RCP’s billing systems.

In order to progress the switch from the LRCP, the GRCP will send a “switch order” request to the Hub for onward routing to the LRCP. For many RCPs, the Business switch order will be considered as another “supplier order” to be managed alongside all the other supplier orders.

The switch order effectively allows the GRCP to tell the LRCP that the customer has given express consent to the switch. It informs the LRCP of the proposed migration date), and which LRCP services must be ceased (either because they are being switched, or e.g. the customer no longer wants any voice service and is taking a broadband only service from the GRCP). Note that is in addition to any of the following existing order types:

- Number porting request (from voice provider in gaining supply chain to voice provider in losing supply chain).
- Order for intra network transfers (e.g. “transfer orders” into Openreach).

### 4.1 Content of switch order

The switch order should include the following information:

- Identity of the losing retail provider.
- SOR and the type of match request that the SOR was returned against, e.g. Business
- List of services to be ceased. This list should match the services which were successfully matched in the match response that included the SOR.

E.g. if the match request was to cease IAS and retain NBICS, but the match response indicated that voice could not be retained, the GRCP can gain the customer’s acceptance that voice must also be ceased. The switch order must then include cessation of both IAS and NBICS.

~~For each service to be ceased:~~

~~An indication of whether the GRCP is requesting an intra-network transfer (e.g. an intra-network transfer of a copper line or a fibre service)~~

~~For voice service, an indication of whether the GRCP is requesting a port (or other intra-network retention) of the number.~~

- Note that where the match response indicated that a service could be retained, the switch order should omit that service – the switch order will only list the services that the LRCP should cease.
- Intended migration date.

The indication of intra-network transfer or number port may assist the LRCP in correlating the switch order with any unsolicited cease that their supply chain may send for the transfer or number port. This correlation will help the LRCP to understand that the unsolicited cease is associated with the switch order, and thus Cancel Other of those unsolicited ceases is prohibited.

### 4.2 BSW1.33 & BSW1.36 Losing retail provider receives switch order and confirms acceptance or rejection

This step represents the receipt of the switch order by the LRCP. The LRCP must respond to the switch order with either an acceptance or a rejection.

If the LRCP already has an open switch order against some or all of the services requested for cessation (whether from another GRCP or the same GRCP), they would reject the switch order for that particular service.

However, if their customer has placed a cease order, the LRCP should make every effort to accept the switch order, taking the migration date in the switch order as higher priority. RCPs may choose to cancel the customer's pending cease order, and replace it completely with the details from the switch order<sup>9</sup>, but they must inform the customer of the impacts.

Other possible reasons for rejection include:

- Invalid switch order reference.
- Switch order reference has expired.
- SOR value does not match to the combination of services being ceased.
- Services already ceased.

### **4.3 BSW1.41 Gaining Provider - Update Switch Order Request**

During the switching journey it may be necessary for the switch date to be delayed or changes to the switch order itself. This could occur for several reasons including at the customer's request or due to supply chain delays. In this instance, where a Gaining Provider becomes aware of a switch order change they should contact the Losing Provider(s) with these details.

The Gaining Provider must an update to the Losing Provider(s) via the hub with a switch order conveying changes to planned switch date.

The message will include the Switch Order Reference, the services to be switched and the planned switch date for each service.

#### **4.34.4 Losing retail provider sends notification to customer**

If the LRCP accepts the switch order, they must send a notification to the customer:

- If all of the customer's services are being ceased this will be a "sorry to see you go" (STSYG) notification.
- If any services are being retained or changed, the notification may be partly STSYG and partly notification of the impacts on the other services.

#### **4.44.5 Losing retail provider should not initiate cease on a fixed date**

It is important to note that the switch order will contain an intended migration date:

- The GRCP will have asked a customer to agree an intended migration date.
- The customer may have requested a delayed migration date, e.g. to fall after expiry of a minimum commitment period (to avoid ETCs) or to a date for engineering visit that suited them.
- Delays can be encountered, e.g. a difficulty encountered during an engineering visit, which delays completion past the original commitment date.

The LRCP should await confirmation that the cease should be triggered.

#### **4.54.6 BSW1.70 GRCP handling of rejected switch order**

If the LRCP sends a rejection of the switch order, the GRCP will be responsible for resolution of this rejection. The GRCP may need to consult with the customer, and will need to cancel their order with their supply chain if they cannot fix the issue with the switch order.

E.g. if the LRCP rejects a switch order as it has another open switch order, the possible resolutions include:

- Full cancellation of the GRCP's "customer order" if the customer advises that they are proceeding with another GRCP. In this case, the GRCP must cancel their order with their supply chain.
- If the customer advises that they have cancelled the order with another GRCP, this could be a timing issue, and a re-submission of the switch may be accepted (once the LRCP has received and processed the cancellation of the first switch order). In this case, the order with the supply chain would not be cancelled.

#### **4.64.7 BSW1.29 Gaining supply chain raises number port order(s).**

If the switch contains a number port, the GRCP via their supply chain<sup>10</sup> will raise a port order with the losing voice provider, and also with the range holder if different, using the most efficient method available as identified during the matching process.

The porting process itself remains unchanged, with the possible exception of the gaining retail provider proactively deciding to share a letter of authority within hub messaging.

It should be noted that even though a switch order may be accepted, it does not prevent a port request from being subsequently rejected for other reasons. Where a port is rejected and the issue cannot be resolved, then the customer may decide to cancel the switch.

#### **4.74.8 BSW1.60 Gaining supply chain completes order(s)**

The supply chain will complete provision or transfer of service(s) and inform the GRCP of completion. If the voice order involves number porting, that may be a separate supply chain, and the completion for the porting may come from a different source and at a different time.

#### **4.84.9 BSW1.62 Receipt of notifications of unsolicited cease(s) by LRCP**

The LRCP may receive various notifications around the unsolicited cease(s), from initial notification to final completion. The supply chain may generate separate unsolicited ceases for the voice and broadband, and number port may result in a separate unsolicited cease.<sup>11</sup>

Openreach have advised that they are not changing their managed cease notifications, and they will continue unchanged for an intra network switch or a number export from WLR (e.g. KC11, KC12, KC13)

#### **4.94.10 BSW1.63 Gaining retail provider receives order(s) completion from supply chain**

The GRCP will receive notification from their supply chain of completion of their provision or transfer order(s). There may be several notifications, e.g. if their supply chain has separate orders for voice and broadband, or the order involves number porting via a different supply chain (e.g. for a VoIP service).

The GRCP will send confirmation to the customer of completion of the switch and activation of their new service(s).

The GRCP will also send the Hub a "trigger message" for the switch order, to trigger the LRCP to cease their service(s) and complete the switch order. As there may be a period of dual running, this may be triggered at a later point in time.

#### **4.104.11 BSW1.64 Customer receives confirmation of order completion**

The customer will receive confirmation from the GRCP, e.g. "welcome to service" messages.

#### **4.114.12 BSW1.71 Completion of switch order by LRCP**

The LRCP will receive the switch order trigger message.

Note that the original switch order will have included an intended migration date, but the provision of service by the GRCP's supply chain may have been delayed. The LRCP must not trigger any cessation activities until they receive the switch order trigger message, even if the original migration date has passed. The switch order trigger message effectively provides a final migration date.

For an inter network switch, the LRCP must send a cease request(s) to their supply chain.

<sup>10</sup> E.g. for WLR any number port request is included with the "transfer order" raised in Openreach, and Openreach raise any required NPOR/NPAR in the background. In other cases, the GRCP will raise a port request into their voice provider who will raise the NPOR/NPAR. In other cases, the GRCP may raise the NPOR/NPAR themselves.

<sup>11</sup> Openreach will consolidate transfer of WLR and any associated number port into a single managed cease notification for the downstream LP. The network functions of Sky and TalkTalk may do similar for their downstream retail divisions or retail CPs. With the move to VoIP, CPs are increasingly required to handle porting separately from Openreach.

For an intra network switch, the handling will depend on their supply chain. E.g. Openreach will reject a cease request if their managed cease order is open or complete, so the LRCP should not send a cease request to Openreach.

In both cases, the LRCP will need to cease other services as appropriate and trigger other actions, such as prompting the customer to return equipment.

The LRCP will also need to update their billing systems. If they did not process the switch order trigger message on the day it was sent, they may need to back-dating the cessation date. The correct cease dates will need to be updated on their billing systems. The LRCP will then send a final bill to the customer which may include charges for any applicable notice periods.

Some terms and conditions of the LRCP contract may continue to apply. E.g. charges for the non-return of equipment.

#### **4.124.13 BSW1.72 Cease of service(s) by losing supply chain**

When the LRCP receives the switch order completion message, for an inter network switch, they will ask their supply chain to cease service(s).

This may be the first notification(s) that the losing supply chain receives for the overall switch process.

#### **4.134.14 BSW1.74 Losing retail provider notifies GRCP that switch is complete**

The losing retail provider will send a response to the switch order trigger message to the GRCP via the Hub – effectively this message represents completion of the switch order by the LRCP.

The sending of this message might be delayed by processing either by the LRCP or their supply chain, e.g. if cessations are only processed on a working day. However, the LRCP must not delay the response until all payments received or return of equipment by the customer.

#### **4.144.15 BSW1.76 Gaining retail provider receives notification that the switch is complete**

The GRCP will receive notification that the LRCP has completed all their steps to cease service(s) and billing.

Note that this response may be delayed by processing either by the LRCP or their supply chain. GRCP s may choose to close their customer order when they have received completion from their supply chain (e.g. if having an open order prevents the new customer from raising any fresh orders). However, the GRCP should be able to handle the LRCP response as a late update to their customer order.

GRCP s should also monitor for lack of receipt of confirmation from the LRCP, and treat this similar to other order failures. For exampleexample, if no notification is received a chase may be necessary.



## 5 Cancel Own

Having successfully placed the switch order and with that switch order being 'in-flight' with both GRCP and LRCP, the customer may for whatever reason choose to cancel that order. Where the customer chooses to cancel the switch order via the GRCP with whom they placed the original switch order, this will be referred to in this document as a "Cancel Own"<sup>12</sup>. Such cancellations will be subject to the standard PONR restrictions imposed by the gaining supply chain.

### 5.1 Customer wishes to cancel the switch

After placing their order and providing their express consent to proceed with the process the customer is within their rights to cancel the order with the GRCP. Where the switch order is either complete or has passed the point of no return (PONR) as defined by the GRCP a Cancel Own request would not be processed.

The GRCP should be in a position to understand the PONR timing imposed by their supply chain (e.g. for Openreach, it is typically 4pm on the day before the commitment date), and how much extra safety margin they apply (e.g. many RCPs using Openreach apply a 3pm cut-off for capture of a cancellation request, so that they can get it to Openreach before 4pm).

### 5.2 BSW1.50 GRCP cancels the provision / transfer order(s) and switch order

Once the customer has requested that the order be cancelled, the GRCP must:

- Notify the LRCP of the switch order cancellation via the Hub
- Send an order cancellation request to the gaining supply chain to initiate cancellation of the provision / transfer order.

### 5.3 BSW1.55 Gaining supply chain cancels provision / transfer order(s)

Once the switch order cancellation has been initiated the gaining supply chain should cancel down the provision / transfer order(s). It is expected that GRCP's and their supply chains will follow their existing Cancel Own processes.

#### 5.3.1 Gaining supply chain notifies losing retail provider of cancellation of unsolicited cease

In an intra network switch, the supply chain will have notified the losing retail provider of unsolicited cease(s) triggered by the GRCP placing transfer order(s) for the switch.

As per the existing cancel own process in place the gaining supply chain will notify the losing retail provider that those unsolicited cease(s) have been cancelled.

#### 5.3.2 LRCP receives notification of cancellation of unsolicited cease(s)

In an intra network switch, the LRCP will receive the notification of cancellation of the unsolicited cease(s). The LRCP will take the appropriate steps to clean up their records of the unsolicited cease(s)<sup>13</sup>.

#### 5.3.3 GRCP creates a switch order cancellation request

Alongside sending an order cancellation request into the gaining supply chain the GRCP will also need to create a switch order cancellation request message and send it to the LRCP via the Hub. This request message should include:

- The switch order reference
- A cancellation reason code as appropriate (to be defined)

### 5.4 BSW1.55 LRCP receives switch order cancellation request

Once routed correctly the LRCP will receive the switch order cancellation request from the GRCP.

Note that in an intra network switch, the LRCP will also receive notification of cancellation of the unsolicited cease(s) from their supply chain. The notifications from the Hub and from the supply chain may arrive in either sequence and the LRCP must be able to handle this.

In most cases, the LRCP will not need to cancel with their supply chain:

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<sup>12</sup> The terminology of "cancel own" and "cancel other" was used in the former NOT+ process and rules, and is thus recognised by many in the industry, and retained in this industry process.

<sup>13</sup> The LRCP may delay creation of a "customer order" until they receive notification of triggering of the switch order. So we're being careful not to use the term "order" where for some RCPs, there may not be an "order" at this point in time.

- For an intra network switch, the LRCP should receive notification from their supply chain of cancellation of the unsolicited cease(s). So the LRCP does not need to initiate cancellation.
- For an inter network switch, the LRCP is very unlikely to have yet told their supply chain about the expectation of a cease on the future migration date, so there would be no pending order with their supply chain to cancel.

But in some scenarios, they may need to inform their supply chain, depending on the processes used by their supply chain.

#### 5.4.1 LRCP responds to switch order cancellation

When the LRCP received the original switch order request they will have created some record of this.

The LRCP will need to update their record of the switch order (e.g. record it as cancelled), wait for a response from their supply chain and then send a response to the GRCP (via the Hub) to confirm that they have received the switch order cancellation and completed their processing.

## 6 Appendices

### 6.1 Appendix I: Out of area geographic numbers

Some CPs have missed the recent Ofcom guidance that geographic numbers can be taken out-of-area, notable when a customer moves premises and the voice network can support the retention of their existing number (notably in “All-IP” networks).

GRCPs are reminded that they need to check that their gaining supply chain can support any number that the customer wishes to retain, in addition to checking whether it can be imported. Supply chains may offer a single combined check, or the GRCP may need to invoke separate checks.

The supply chain might not support the number for technical reasons (e.g. older PSTN technology typically restricted the number ranges that could be hosted on an exchange, whereas “All-IP” networks typically have less constraints) or for commercial reasons (e.g. calls from 028 numbers to the Republic of Ireland may have a cheaper rate, so supply chains may constrain 028 number to Northern Ireland only and vice versa).

Appendix 2:

### 6.2 Appendix II: Address Quality- Structure of a UK address

It is expected that retail CPs will use authoritative sources of quality address data, such as:

- Ordnance Survey’s AddressBase products, covering addresses in GB.
- Ordnance Survey’s AddressBase Islands products (which includes Northern Ireland).
- Ordnance Survey NI’s Pointer products, covering addresses in Northern Ireland.
- Royal Mail’s PAF products, covering all of the UK.
- Or a commercial provider who aggregates all the above data.

It is also expected that retail CPs will understand the structure of a UK address, including sub building name, building name, building number, dependent thoroughfare, thoroughfare, double dependent locality, dependent locality, post town and postcode (and not just “line 1”, “line 2”). Readers unfamiliar with the structure of a UK address may wish to consult the Royal Mail PAF Programmers’ Guide at <https://www.royalmail.com/marketing-services/address-management-unit/address-data-products/programmers-guide>. (Note that most modern addressing products do not split thoroughfare into name and description – PAF started in the days of Summary of match information to be provided by the LRCP.

The structure of a UK address consists of the following elements:

Element	Comments
Sub building name	E.g. ‘Flat 1’, ‘Apartment 1’
Building name	E.g. ‘Rose Cottage’, ‘Mandela House’
Building number	E.g. ‘1’, ‘1A’, ‘101-102’
Dependent thoroughfare	
Thoroughfare	Aka street name
Double dependent locality	
Dependent locality	
Post town	Mandatory
Postcode	Mandatory

This structure was initially documented by Royal Mail in their PAF Programmer’s Guide.

Note that the PAF Guide defines some very strict rules:

- PAF building numbers can only be purely numeric, and values such as ‘1A’ and ‘101-103’ are held as building name. Most modern implementations and data sources permit values such as ‘1A’ and ‘101-102’ as the building number.
- The original PAF split thoroughfare and dependent thoroughfare into a separate name and descriptor with a standard list of approximately 200 descriptor words (e.g. ‘Avenue’, ‘Street’). Modern implementations and data sources combine the name and descriptor as a single string.

PO Box number is intentionally omitted from the above list, as it could not be a valid service address.

### 6.3 Appendix III: SLAs and response times

#### 6.4 Appendix III: SLAs and response times

There are several expected response times, expiry periods, audit trail periods and other SLAs.

Within the SLAs we refer to simple and complex switching.

A simple switch is defined as:

- 5 or less services to be switched as part of the match request.
- Single location of services.

A complex switch is defined as:

- More than 5 services to be switched as part of the match request.

Single location of services where greater than 5 services to be switched or Multi locations.

The SLAs below are proposed for the purposes of review and comment:

<u>Item</u>	<u>SLA and comments</u>
<u>Responses to Customer match, service match and asset list requests.</u>	<ol style="list-style-type: none"> <li><u>1. Customer Match. Simple and complex switch scenarios must be completed by the end of one full working days following receipt.</u></li> <li><u>2. Service Matches. For simple switches the match SLA is by the end of the next working day following receipt. For complex switches:</u> <ul style="list-style-type: none"> <li>• <u>6-50 end of two working days following receipt of match request</u></li> <li>• <u>51 to 200 end of three working days following receipt of match request</u></li> <li>• <u>201 to 500 end of four working days following receipt of match request</u></li> <li>• <u>501 – 1000 end of 5 working following receipt of match request</u></li> <li>• <u>1001 + 7 working days following receipt of match request</u></li> </ul> <p><u>Responses are expected to be quicker where match requests in the same format as data provided within the asset lists.</u></p> </li> <li><u>3. Where an asset list is requested. The confirmation from the LRCP to the GRCP of how the asset list will be sent to the customer should be sent within one full working days following receipt.</u></li> </ol>
<u>Customer Notification of Switch</u>	<u>Where a Losing Retail CP decides to send the customer a communication keeping them informed of the impacts of leaving and notice of an intended switch, the communication should be issued as soon as soon as practicable to do so.</u>
<u>Expiry of an SOR</u>	<p><u>An SOR is valid for 6 months from date of generation. Both the gaining and losing retailer should store the date in which the SOR was generated.</u></p> <p><u>An attempt to place a switch order using an SOR more than 6 months old will be rejected by the LRCP. {consider res to business and vice versa as SOR 31 days on OTS journey}</u></p>
<u>Retention of SOR by LRCP</u>	<p><u>The LRCP should retain the SOR for at least another 6 months after expiry (so that the response can be that SOR is expired, rather than invalid if it were already deleted).</u></p> <p><u>LRCP's housekeeping and audit trail policies may mean that they retain expired SORs and other OTS match audit trail information for a much longer period. (as above).</u></p> <p><u>Note some variances may apply for business to residential (and vice versa) switches.</u></p>
<u>Asset List</u>	<p><u>For simple switches the asset list should be issued by the end of the next working day at the latest.</u></p> <p><u>For complex switches the asset list should be issued by the end of two working days at the latest.</u></p>
<u>Acceptance or rejection of switch order</u>	<u>For simple switches the SLA is by the end of the next working day at the latest.</u>

Item	SLA and comments
	<u>For complex switches the SLA is by the end of two working days at the latest.</u>
<u>Acceptance or rejection of an amendment or cancellation of a switch order.</u>	<p><u>For simple switches the SLA is by the end of the next working day at the latest.</u></p> <p><u>For complex switches the SLA is by the end of two working days at the latest.</u></p>
<u>Latest date to trigger an open switch order</u>	<p><u>The GRCP must trigger an open switch order within 31 days of the migration date (counting the migration date as day zero). If the migration date was changed in a switch order amendment, this is relative to the migration date in the last update.</u></p> <p><u>This period is intended to account for typical delays, such as engineering issues being encountered on the installation date (which are typically resolved within a few days), or a gaining supply chain which use a "commit on CCD"<sup>14</sup> model.</u></p> <p><u>If the switch order is not triggered within 31 days, the LRCP may send a cancellation notification to the GRCP.</u></p>
<u>GRCP notification to LRCP of completion of switch.</u>	<u>The GRCP should confirm that the switch has completed, and services are ready to be ceased or cancelled by the LRCP as soon as practicable to do so.</u>
<u>Confirmation of switch order completion by the LRCP.</u>	<u>The LRCP should confirm customer specified services are no longer active (e.g., migrated, ceased or cancelled) as soon as practicable to do so and keep the customer informed as appropriate.</u>

A working day for matching purposes is 'generally' defined as Monday to Friday 9-5 excluding public holidays.

### **6.5 Appendix IV: Switching Dispute**

It is anticipated there may be some business switching scenarios whereby the 'Authoritative' business customer has not given permission for a switch to take place and is alerted to this via switching implications comms sent by LRCP.

Some examples include:

2. A taxi company 'minor partner' is attempting to switch the services and set up in the account in their name following a breakdown in partnership.
3. A school arranges a switch to a new GRCP without realising that a broader council contract is in place with authority over which provider is use. If the school changes providers significant penalties would arise for the council.
4. A company has gone into liquidation and a party approaches a new provider to switch the service/services.

It is therefore proposed that LRCP's where appropriate can request a 'pause' of the switch to the GRCP whilst any dispute is resolved. It is expected that any dispute would be initiated after an order has been placed, any communications sent the by the LRC have been read- by the end customer who would contact their current provider to advise the switch hasn't been authorised or permission been given by the recognised account holder.

It is proposed the switching dispute would be triggered by the LRCP sending a 'dispute' message to the GRCP to notify them their end customer has requested the dispute process is initiated. An SLA of 4 working hours is proposed for the GRCP to respond and acknowledge receipt of the dispute message.

Resolution of the dispute may involve the LRCP and GRCP working together, potentially obtaining sufficient evidence such as a letter of authority to validate the customer's authenticity or permission.

In the event the GRCP fails to act and continues to proceed with the switch, the LRCP will have the right to reject the switch trigger request if a dispute is open. (rejection code TBD).

There could also be a scenario whereby the customer is aware of the switch, there is no question around authority or permission, however the GRCP has failed to send a 'cancel own' as expected. This could be driven by the end customer contacting their current provider to confirm the cancel has been processed, looking for reassurance the switch of retailer is not going ahead.

In this scenario, the LRCP would be expected to ask the end customer when they contacted the GRCP and if a reasonable timeframe has elapsed for the GRCP to send the cancel own, it would be permissible for the LRCP to request a pause of the switch as described above.

**6.6 Appendix V: Customer References and Asset Lists**

Consideration should be given to the type of asset list request and what would be returned based upon the losing retail communication’s provider account structure.

Retail CPs are encouraged to provide a summary of how account information is structured to support Business customers switch.

Below are some examples of how this may work in practice based upon both the asset request type and the LRCP account structure.

	Asset Message Type			
Match Information Provided	Account	Address	'Only'	All
	Assets associated with the account presented on this request, this will include services at all locations linked to the same account.	Assets associated with the address presented on the match request, this will include other accounts at the same address for the same customer if the LRCP has that association available.	Assets associated to the address on the match request or associated with one account provided by the requestor regardless of how many accounts or service locations the LRCP can identify.	Assets associated to all addresses and accounts associated to the requesting customer, as known to the losing provider.
Reference not provided or incorrect or customer match rejected	Reject	Reject	Reject	Reject
Account Reference assigned at the Service Level	Asset list would contain single service linked to account.	Service address linked to Address provided in Customer Match Request	Asset list would contain single service linked to account reference and all asset slinked to the address.	LRCP to determine based upon Account provided - definition of customer
Account Reference assigned at the service level, but master billing reference exists	If Master Billing reference is used expectation that all data associated with the master reference is provided.  If service level account reference is provided - single service to be returned	Service address linked to Address provided in Customer Match Request	If Master Billing reference is used expectation that all data associated with the master reference is provided assets relating to the address provided in the customer match.	If Master Billing reference used expectation that all data associated with the master ref is provided. If service level LRCP to determine based upon Account provided - definition of customer.
Account Reference relates to a subset of the data (such as a region or at Legal entity level)	LRCP would issue all items listed under the Sub Account.	Service address linked to Address provided in Customer Match Request	LRCP would issue all items listed under the Sub Account as well as assets linked to the location in the customer match.	The LRCP will need to determine if the end customer is associated only with the sub account (e.g. Company 1 under a Group account) or whether multiple accounts are associated to Company 1 and therefore all records for company 1 would be returned.

<u>Account Reference (Group Account or Multiple entities)</u>	All assets associated with the Customer Account. Where multiple business names associated with master account, the Business name will be required.	<u>Service address linked to Address provided in Customer Match Request</u>	All assets associated with the Customer Account where the address also matches that provided on a customer match. Where multiple business names associated with master account, the Business name will be required.	All assets associated with the Customer Account. Where multiple business names associated with master account, the Business name will be required.
<u>Full Address</u>	N/A	Full address provided in the customer match should be used to identify the address in question.	Account number and address would define scope.	Address details provide an additional source of information to help the LRCP identify the target customer based upon the account and business name.
<u>UPRN</u>	N/A	UPRN (where G/LRCP uses) the UPRN location should be used to determine assets	Use UPRN address as a proxy for the address	
<u>Partial Address</u>	N/A	If a partial address means a single location and services can not be identified default to all assets	If a partial address means a single location and services can not be identified default to all assets	