

Switching for Business Open Orders

A best practice guide

Version 1.0
Published 11/09/2025

Contents

1	Introduction	3
1.1.	Change log.....	3
1.2.	Abbreviations and definitions.....	3
3.	Types of open orders covered in this guide.....	5
4.	Customer initiated cease order with future date	5
4.1.	Open cease order at time of matching	5
4.2.	Open cease order at time of switch order request.....	5
4.3.	Customer wishes to place a cease order with an open switch order or after triggering of a switch order	6
5.	RCP initiated cease order due to any breach of contract	6
5.1.	Principle: SforB and ceases due to breach of contract run in parallel	6
5.2.	Open cease order at time of matching or switch order request	6
5.3.	Completed cease order at time of switch order request.....	7
5.4.	Completed cease order at time of SforB update	7
5.5.	Completed cease order at time of SforB cancellation	7
5.6.	Completed cease order at time of SforB trigger	7
6.	Customer initiated regrade order	7
6.1.	Principle: SforB takes priority over long-lived customer initiated regrade orders, but subject to PONR.....	7
6.3.	Open regrade order at time of switch order request	8
6.4.	Customer wishes to place a regrade order or recontract with an open switch order.....	8
7.	RCP initiated migration order with future date	8
7.1.	Principle: RCP initiated migration orders may take priority over SforB, but with limitations	9
7.2.	Customer is being migrated at time of switch order request.....	9
7.3.	Customer is being migrated at time of matching	9
8.	Another switch order	10
8.1.	Principle: First switch order takes priority over any later switch order	10
8.2.	Open switch order at time of 'service' matching.....	10
8.3.	Open switch order at time of switch order request	10
9.	Appendix A – Impacts on Openreach CPs	11
9.1.	Transfer with pending cease.....	11
9.1.1.	Current Openreach handling and validation.....	11
9.1.2	Potential conflict between SforB and Openreach rules	12
	Potential GRCP strategy to handle conflict when it arises.....	12
9.2.	Transfer with pending change order	12
9.2.1.	Current Openreach handling and validation.....	12
9.2.2.	Potential conflict between SforB and Openreach rules	12
9.2.3.	Potential GRCP strategy to handle conflict when it arises	13
9.3.	Transfer with pending transfer and managed cease	13
9.3.1.	Current Openreach handling and validation.....	13

9.3.2. No conflict between SforB and Openreach rules 13

9.4. Attempt to cancel for breach of contract with open managed cease 13

1 Introduction

This document is one of a series of best practice guides related to Switching for Business (SforB). This document focuses on customers who have an open order with their LRCP when they try to match or switch.

The intended audience of this document is personally responsible for the technical implementation of Switching for Business in retail communications providers and MAPs, including business analysts, solution architects, and implementation and testing teams.

It is assumed that readers are familiar with both the SforB Industry Process and the SforB Message Specification which can be found at [Gaining Provider Led Business Switching public - FCS](#). If you are not familiar with the content of those documents, you are encouraged to download and read them before reading this document.

1.1. Change log

Version Date Changed by	Reason for change
V0.1 First draft -18/06/2025 Chaz Beatty / Niall Gillespie	First draft for discussion and review by the SforB Industry Process Group.
V1.0 Publication 11/09/2025	Document published

1.2. Abbreviations and definitions

Abbreviation / term	Meaning / definition
CP	Communications provider This is a term defined by Ofcom in their General Conditions of Entitlement as: “a person who provides an Electronic Communications Network or an Electronic Communications Service”.
RCP	Retail CP. This term was first defined in the OTS Industry Process (and re-used in the SforB documentation) to define those CPs who provide services at the retail level to end- users, both consumer and business.
MAP	Managed Access Provider This is the term used to refer to providers of “Managed Access Solutions” for RCPs who wish to use the services of a TPI to interact with the Hub(s).
TPI	Third party integrator This is a commonly used term within the UK telecoms industry to refer to parties who provide integrations services to CPs, but CPs but are not themselves CPs.
OTA2	The Office of Telecommunications Adjudicator. The OTA2 was established as a follow-on to the original OTA Scheme and is independent of Ofcom and of industry.
CRD	Customer Required by Date A common term indicating the date that the customer has stated as their requirement in a captured order, e.g. for provision, regrade or cessation.
CCD	Customer Committed Date Supply chains are sometimes not able to meet the CRD and instead return a date that they can commit to. Delays are more common on provision and regrade orders. Cease orders tend to have short lead times (usually same day), so any CRD can generally be met.

Switching for Business Open Orders - A best practice guide

PONR	Point Of No Return A common term indicating the cut-off time for amending or cancelling an open order. It is often specified relative to CCD, e.g. "CCD-1;16:00" means 4pm on the calendar day before CCD.
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2. Reminder of the steps for a switch under the SforB process

The SforB Industry Process defines three steps for switching:

1. Matching, including dispatch of impacts of switching by the LRCP.
2. Switch order initiation, using an SOR (switch order reference) returned from an earlier match.
3. Switch trigger, sent by the GRCP when they are ready for the LRCP to cease existing services.

Additionally, a switch order may be updated (to change the proposed migration date) or cancelled.

3. Types of open orders covered in this guide

This document covers the following scenarios which fall under a general banner of “open order”:

- The customer has placed a future-dated cease order.
- The customer is in a dunning process (collections), where a future step might be cessation of service.
- The customer is in any other breach of contract situation¹, where a future step might also be cessation of service.
- The customer has placed a regrade order with an expected future completion date.
- The RCP has placed a regrade order (e.g. in support of WLR withdrawal) with an expected future completion date.
 - These could be individual orders, or a bulk update process.
- Another switch order is open with an expected future switch date.

4. Customer initiated cease order with future date

Some customers believe that it is necessary for them to initiate a cease order with their LRCP.

The customer could place their cease order at different points in time:

- Before they initiate a match request with a potential GRCP.
- After a match request (and generation of SOR), but before they provide their express consent to the GRCP to initiate a switch order.
- After they have initiated a switch order.
- After the GRCP has triggered the switch order

Openreach have documented how they handle transfer orders placed against a line which has a future-dated cease – the LRCP initiated cease is cancelled and replaced by the managed cease associated with the transfer order

4.1. Open cease order at time of matching

An open cease order at time of matching is not considered to be a barrier to generating an SOR and sending impacts of switching to the customer.

4.2. Open cease order at time of switch order request

An open cease order at time of receipt of the switch order request by the LRCP should not be a barrier to switching, unless the switch order is received past the PONR of the cease order.

Best practice

If the customer has a future dated cease order, and the LRCP received a switch order request before a reasonable cut-off time (PONR), the LRCP should automatically cancel the cease order, and advise the customer of this cancellation.

The PONR should be reasonable. E.g. Openreach have a cut-off time of CCD-1;16:00 for cancellation of many order types, and the LRCP may add a few additional hours to cover processing within their own systems and any supply chain (e.g. BT Wholesale have a cut-off time of CCD-1;14:00). Cut-off times much earlier than this risk being considered by Ofcom to be a “frustration of the switching process”.

¹This includes situations where the customer is suspected of using their services for some fraudulent, malicious or illegal purposes, or where a competent authority has asked the CP to support some investigation or restrict services.

If the switch order request is received after the PONR of the future dated cease order, the LRCP should reject the switch order with error code 1214 (There is an open cease order which is past point of no return and cannot be cancelled. <Required text to provide expected date of cessation>).

4.3. Customer wishes to place a cease order with an open switch order or after triggering of a switch order

It is expected that RCPs will have processes to prevent customers placing cease orders whilst there is an open switch order, or after the switch order has been triggered.

Note that LRCPs may need to support customers who wish to cease services that will be retained by default on switching, but which the customer no longer requires.

5. RCP initiated cease order due to any breach of contract

Most RCP use the term “dunning process” in relation to the steps they follow with a customer when they do not pay their bill. Typical steps include reminder notices and restriction of service, with eventual disconnection followed by passing of the debt to a collection’s agency.

Some RCPs only raise such cessation orders when the dunning process reaches that decision point and are an immediate request (e.g. CRD is same day). For these RCPs, this means that it is less likely that such a cease order is open at the time of receipt of either a match request or a switch order request though not impossible. Other RCPs raise a cease order in advance (and cancel that cease order if the customer makes payment). For these RCPs, it is more feasible to encounter an open cease order at the time of receipt of match or switch order.

There are other reasons why an RCP may cease a customer’s service for breach of contract, e.g. misuse. Although these processes may differ from dunning, they typically also include a step for disconnection of service, which again is typically a same-day cease order.

This document aims to cover both RCPs who raise same-day cease orders for any breach of contract situation, regardless of the particular breach, and those RCPs who raise advance cease orders, e.g. in a dunning process.

5.1. Principle: SforB and ceases due to breach of contract run in parallel

Best practice

RCP’s processes for breach of contract (e.g. non-payment) typically reach a stage where services are fully disconnected. We will call this the “disconnect date”.

An LRCP may execute a cease order on the disconnect date if the switch order has not yet been triggered.

If the switch order trigger arrives before the disconnect date, the relevant cease required in support of the switch should be triggered.

Note that the above best practice refers to when the trigger arrives, rather than when the switch was planned. E.g:

5.1.1. Switch is planned before disconnect date, but GRCP has some delay and sends the trigger after the disconnect date – the services would have been ceased on the disconnect date.

5.1.2. Switch is initially planned before disconnect date but is amended to a date that is later. Services will be ceased on the disconnect date.

5.2. Open cease order at time of matching or switch order request

It is expected that some cease orders raised in response to a breach of contract will be short lived (i.e. CRD is for same day, and the cease order will not be open for long).

It is valid for the LRCP to treat such an open order in either of two ways:

1. The LRCP could ignore the presence of the open order and handle the match or switch order as if there was

no open cease. This is valid because a cease order for breach of contract could also be raised after sending a successful response to a match request, or after accepting a switch order.

2. If the LRCP's cease order for breach of contract are short-lived, with very little incidence of failure or opportunity for cancellation, and thus the cease is imminent, the LRCP may treat the match request or switch order request as if the cease order had completed and the impacted services had already been ceased.

However, if the LRCP's policy is to raise a pending cease which stays open for a period of days and could be cancelled (e.g. customer makes a payment), then option 2 above may be deemed unreasonable, and the LRCP would have to follow option 1.

5.3. Completed cease order at time of switch order request

If the services were active at the time of matching (so an SOR was returned) but have been ceased by the time a switch order request is received, there are no services to be switched. So, the LRCP should return a rejection with faultCode 1212 (All services requested to be ceased are no longer active).

5.4. Completed cease order at time of SforB update

If the services were active at the time of receipt of the switch order request (so the request was accepted) but are subsequently ceased before receipt of the switch order trigger, then some GDPR considerations come into play.

A cessation following acceptance of a switch order request is an involuntary cease, and the reason for the cease could possibly be considered private information. The customer should be aware of the reasons for and completion of the cessation.

If the services are ceased before receipt of the switch order update, there are no services to be updated. So, the LRCP should return a rejection with faultCode 1312 (Service is not available to switch).

5.5. Completed cease order at time of SforB cancellation

If the services were active at the time of receipt of the switch order request (so the request was accepted) but are subsequently ceased before receipt of the switch order cancellation, there are no services to be switched. So, the LRCP should return a rejection with faultCode 1512 (Service is not available to be cancelled)

5.6. Completed cease order at time of SforB trigger

The trigger message is effectively a request from the GRCP for the LRCP to cease services. If the services have already been ceased by the LRCP, they can respond to the trigger request with a confirmation and not expose any potentially private information to the GRCP.

6. Customer initiated regrade order

Most RCPs have four highest level classifications of order types: provision for new customers; modify (or change) for existing customer making a change; cessation for existing customers; and move.

Modify or change orders can be further split into sub-classifications:

- Short-lived orders, e.g. for commercial re-contract, but without any underlying service changes in the supply chain.
- Long-lived orders, typically involving a supply chain element, e.g. a technology change from copper to full-fibre, with an associated engineering visit and lead times measured in days or longer
- Other forms of regrade (e.g. speed change implemented remotely) sit between short and long-lived orders.

Modify or change orders can be triggered by customer request, or by RCP action— see §7 below for RCP initiated migrations.

6.1. Principle: SforB takes priority over long-lived customer initiated regrade orders, but subject to PONR

Best practice

The general presumption of a customer wishing to use the SforB process who has also raised a regrade order with their LRCP is that the customer's later instructions (SforB) take precedence over their earlier instructions (regrade).

6.2. Open regrade order at time of matching

An open regrade order at time of matching is not considered to be a barrier to generating an SOR and sending impacts of switching to the customer.

Note that Openreach have established a precedent that a regrade order (migration order in Openreach's terminology) takes priority over a transfer order.

Best practice

If the customer has an open regrade order at the time of matching, the LRCP should advise the customer of this in the impacts of switching, including the expected completion date of the regrade, and advise the customer to place any switch order before the PONR of the regrade order, in which case the regrade order will be automatically cancelled by the LRCP in favour of the switch order.

6.3. Open regrade order at time of switch order request

An open regrade order at time of receipt of the switch order request by the LRCP should not be a barrier to switching, unless the switch order request is received past the PONR of the regrade order.

Best practice

If the customer has a future dated regrade order, and the LRCP received a switch order request before a reasonable cut-off time (PONR), the LRCP should automatically cancel the regrade order, and advise the customer of this Cancellation.

The PONR should be reasonable. (E.g. Openreach have cut-off time of CCD-1;16:00 for cancellation of many order types, and the LRCP may add a few additional hours to cover processing within their own systems and any supply chain (e.g. BT Wholesale have a cut-off time of CCD-1;14:00). Cut-off times much earlier than this risk being considered by Ofcom to be a "frustration of the SforB process".

If the switch order is received after the PONR of the future dated regrade order, the LRCP should reject the switch order with error code 1215 (There is an open modify order which is past point of no return and cannot be cancelled. <Required text to provide expected date of completion>).

6.4. Customer wishes to place a regrade order or recontract with an open switch order

If a customer contacts their LRCP at a time when they have an open switch order the RCP should have processes to make their advisor aware of the open switch order, so that they can handle the customer contact appropriately.

It is possible that the customer may wish to explore options with the LRCP and might agree to re-contract with the LRCP instead of switching. The LRCP should advise the customer of the need for them to cancel their switch order with the GRCP, and the impacts of not doing so.

7. RCP initiated migration order with future date

RCP may sometimes initiate migration orders on behalf of their customers. Examples include:

- RCPs have been and will be migrating customers from WLR to other technologies.
- The business of an RCP may be purchased by another RCP who use different supply chains. E.g. this could result in customers being migrated from WLR to MPF.

There are various strategies to achieve these migrations:

- Customer elective – e.g. the customer wants to regrade to a new technology and the migration happens as part of the customer order.

- Individual orders – similar to customer initiated regrades but initiated by the RCP.
- Bulk migration processes – these take various forms but typically involve bulk migration files sent into a supply chain, with bulk asset updates in the retail CRM records. Importantly for this Best Practice Guide, there may be no “order”, and limited or no ability to stop a migration once the bulk files have been shared.

It is open to RCPs to treat their own initiated migration orders in the same way as customer initiated regrade order (as described in §6 above). However, this may not be practical for some RCPs, and this section outlines an alternative.

7.1. Principle: RCP initiated migration orders may take priority over SforB, but with limitations

RCP initiated migrations may have some of the following characteristics:

- The customer may see very little change in service (e.g. migration from WLR to MPF might have no impact on the customer’s services).
- Customers are typically not entered into a new contract when the RCP initiates a migration – this is important for a switch which happens shortly after a migration.
- If the customer is supplied with new CPE due to a migration, and then switch under SforB, the LRCP may expect the customer to return the CPE as per their contract with the customer.
- It may not be technically feasible to cancel a migration – this is particularly applicable in bulk migration scenarios.
- There is a risk of customer harm if the migration is cancelled.
- For the context of this Guide, this bullet point only refers to the stage of the overall migration process where bulk files are exchanged, and removing individual customers is either impossible or very difficult. This document uses the term “locked-in stage” for this stage of the overall process

Best practice

For an LRCP to utilise this alternative, they would need to satisfy themselves (taking appropriate legal advice) that they could defend their decision to reject some switch requests based on the above bullet points, including limiting the “locked-in stage” to as short a period as possible.

The LRCP should also communicate to the customer that they are being migrated, and that switching will not be feasible during a limited window.

7.2. Customer is being migrated at time of switch order request

If a customer is at the “locked-in stage” of an RCP initiated migration, the LRCP **may** consider this to be a barrier to switching.

Best practice

If the customer has an open migration at the time of receipt of a switch order request, the LRCP should reject the match request with faultCode 1215 (“There is an open modify order which is past point of no return and cannot be cancelled. (“<Required text to provide expected date of completion>”).

LRCPs wishing to use this alternative approach should populate the required text with an explanation that the customer’s service(s) are being migrated, and the expected date of completion.

7.3. Customer is being migrated at time of matching

Where an LRCP with a customer at the “locked-in” stage would accept the match request and return an SOR but then may reject the switch order request with faultCode 1215, and thus avoid the need to cancel a migration.

This comes with obligations on the LRCP:

- Satisfy themselves that their use of this alternative is justified, considering the bullet point in §7.1 above, and taking appropriate legal advice.
- Keep the “locked-in stage” as short as technically feasible.
- Inform their customer that they are being migrated, and the window of the “locked-in stage” when the customer will not be able to make any other service amendments, including switching to a GRCP.
- By informing their customers, they will reduce the risk of a customer attempting to switch during the “locked-in stage”.

- Consider what information should be included in the impacts of switching to warn the customer that they cannot switch for some time.

8. Another switch order

It is feasible that an LRCP receives a switch order when they already have another open switch order impacting the same customer service(s). There are several scenarios in which this could arise:

1. Miscommunication between Business partners (or decision makers):
2. Customer places a switch order with GRCP 1, request them to cancel the order, but places an order with GRCP2 before the cancellation request passes from GRCP1 to the LRCP and is fully processed.¹¹
3. Customer places a switch order with their chosen GRCP. The GRCP encounters a failure, and their recovery process is a full cancellation and then issue a replacement order. But the replacement order is issued before the cancellation of the first is fully processed.

For the avoidance of doubt, “open switch order” implies that the LRCP has been sent a switch order request and has responded with a confirmation, but the switch order has not yet been triggered or cancelled.

8.1. Principle: First switch order takes priority over any later switch order

Best practice

If an LRCP receives a switch order request, and they have another open switch order (i.e. not cancelled) for the same service(s), they should reject the newly arrived switch order request.

If the rejection is due to a timing issue (e.g. scenarios 2 and 3 above), the GRCP can send a fresh switch order request once the blocking switch order has been fully cancelled.

As a reminder, a switch order relates to an individual service therefore it may still be possible for a business customer to switch other services to other RCPs (which are not yet subject to a switch).

8.2. Open switch order at time of ‘service’ matching

Best practice

If the customer has an open switch order for the same service(s) at the time of service matching, the LRCP should reject the match request with faultCode 1194 - There is already an Active Switch Order against the Service.

8.3. Open switch order at time of switch order request

Best practice

If the customer has another open switch order for the same service(s) at the time of receipt of a switch order request, the LRCP should reject the match request with faultCode 1211 (Service Switch already in progress).

¹¹ The delay could be due to any party in the chain.

9. Appendix A – Impacts on Openreach CPs

Note that the information in this section was not authored or maintained by Openreach. However, the authors believe that the information is correct at the time of writing (July 2025). CPs should check with Openreach for the latest available information.

This appendix outlines a number of impacts that Openreach CPs should be aware of and may need to consider.

Note that Openreach refer to their customers as CPs, so this appendix uses “CP” in the context of Openreach, and “RCP” in the context of SforB.

The best practice documented in the earlier sections of this document potentially conflict with some of the detailed Openreach validations. Each of the sub-sections below firstly summarises the current Openreach handling and then calls out the potential conflict with the SforB best practice. Note that this document does not attempt to capture all of the Openreach detail, but rather to provide a decent summary to enable comparison with the SforB best practice.

9.1. Transfer with pending cease

In 2015 Ofcom raised concerns with OTA2 about scenarios where future-dated ceases were inappropriately being used to prevent end customers from switching CP; Ofcom asked OTA2 to work with industry to find a solution. Over a number of months OTA2 worked with Openreach and interested CPs to develop a set of rules which were subsequently implemented by Openreach on WLR, MPF, SMPF and FTTC products.

Similar rules were introduced in EMP release 5300 for transfers from FTTP to FTTP, and in release 5450 for transfers from other products to FTTP. Previous releases also covered SOGEA and SOTAP.

The following table is a partial list of the Openreach EMP releases and the change references and titles.

EMP Release	Change ref
R3350	OR-34388: Allow fulfilment order journey to progress despite in-flight cease orders
R3400	OR-38321: Switch-on of OR-34388
R4050	OR-50341: L2C – Fix Transfer/Migration Order – Reject Transfer/Migration order if CCD Date is beyond Cease CCD
R5300	OR-78622: SOR8659: FTTP Fulfilment Rejection Reduction
R4150	OR-48945: Migration of Existing Working Services to SOTAP Part 1 - Order Placement and Progression to KCI2
R5450	OR-80828: SOR8659: FTTP L2C Rejection Reduction – Migrations

9.1.1. Current Openreach handling and validation

CP attempts to place a transfer order against an Openreach copper line (or ONT port) which has a pending cease (from an open cease order placed by the current CP), there several restrictions on accepting the transfer order:

1. If the requested transfer date is less than the min lead time for the requested product, the transfer order will be rejected.
 - For a transfer within copper products, the min lead time is currently next working day in support of SFORB.
 - For a transfer of existing FTTP, the min lead time is as short as zero days.
 - Longer min lead time may apply when engineering work is required for the transfer, e.g. installation of new FTTP.
2. If the requested transfer date is prior to or equal to the pending cease date, the transfer order will be accepted.
 - However, Openreach will return a committed date which equals the pending cease date, even if the requested transfer date was earlier.
 - The OTA2, Openreach and industry discussions agreed that the transfer order could not hasten the cessation initiated by the losing CP.
3. If the requested transfer date is later than the pending cease date, the transfer order will be rejected.

- The industry discussions agreed that the principle that a transfer meant no gap in service had precedence.
4. If Openreach accept the transfer order:
- The cease order initiated by the current CP is cancelled by Openreach.
 - Openreach create a new “managed cease” (aka unsolicited cease) as for any transfer order, and send relevant notifications to the losing CP. I.e. the managed cease “replaces” the CP initiated cease.

Note that once this happens, the CP initiated cease is effectively forgotten by Openreach. The losing CP can use “Cancel Other” (if appropriate), the gaining CP can use “Cancel Own” or amend the date of the transfer.

Note that if Openreach committed to a later date than the gaining CP’s CRD (as per point 2 above), the gaining CP could then amend the accepted transfer order to the CRD that they originally requested!!! (as long as there is sufficient lead time for that date).

9.1.2 Potential conflict between SforB and Openreach rules

Consider a customer who has placed a cease order with their current RCP for date B and then gives express consent to a GRCP for a switch order with an earlier date A (e.g. a transfer with next day lead time).

The SforB Industry Process recommends that the GRCP send off the SforB switch order and their supply chain order (i.e. Openreach for the CPs covered by this Appendix) in parallel.

The SforB switch order will be accepted (as long as it is placed before PONR relative to date B), and the LRCP will begin the process of cancelling their open cease order.

Openreach may accept the GRCP’s transfer order, but with a CCD of date B, before the LRCP has sent their cancellation request to Openreach.

Potential GRCP strategy to handle conflict when it arises

The GRCP may need to have a process (automated or manual) to amend their transfer order to date A, once they have received the committed date B.

If the GRCP wishes to place a transfer order for date C (later than the pending cease date B), they may have to await confirmation of the switch order by the LRCP, assuming that the LRCP should have cancelled their cease order before sending the confirmation. They could then place a transfer order for date C.

9.2. Transfer with pending change order

Note that Openreach tend to use the term “modify order” to refer to simpler change orders (such as bandwidth modify) – these are orders which require no engineering work and have short lead times.

Openreach tend to use the term “migration” when an order is moving a customer’s services from one technology to another (e.g. FTTC to FTTP).

9.2.1. Current Openreach handling and validation

When a CP attempts to place a transfer order when there is an open modify order (simple change order), the transfer order will generally be accepted.

When a customer has an open migration order, (e.g. a technology regrade with a future expected completion date), the migration order will typically have triggered a managed cease of the old service. The presence of this managed cease will cause a transfer order to be rejected.

9.2.2. Potential conflict between SforB and Openreach rules

Consider a customer who has placed a migration order with their current RCP for date A (or the current RCP has placed a regrade order, e.g. in support of WLR withdrawal). The customer then gives express consent to a GRCP for a switch order, and the GRCP raises a transfer order (with or without migration).

The SforB Industry Process recommends that the GRCP send off the SforB switch order and their supply chain order (i.e. Openreach for the CPs covered by this Appendix) in parallel.

The SforB switch order will be accepted (as long as it is placed before PONR relative to date A), and the LRCP will begin the process of cancelling their open regrade/migration order.

Openreach may reject the GRCP's transfer order, before the LRCP has sent their cancellation request to Openreach.

9.2.3. Potential GRCP strategy to handle conflict when it arises

The GRCP may need to have a process (automated or manual) to resubmit their transfer order to Openreach, once they have received the confirmation of the SforB switch order from the LRCP, assuming that the LRCP should have cancelled their regrade order before sending the confirmation.

9.3. Transfer with pending transfer and managed cease

When a transfer order has been raised against a customer's line (or ONT port), Openreach will have created a managed cease order for the old service. This applies regardless of whether the transfer is a "level transfer" (e.g. SOGEA to SOGEA) or a migration (e.g. WLR/MPF + FTTC to FTTP).

9.3.1. Current Openreach handling and validation

When a CP attempts to place a transfer order when there is another open transfer order and associated managed cease, the transfer order is rejected.

9.3.2. No conflict between SforB and Openreach rules

The best practice documented in §8 above is that the LRCP should also reject the SforB order if they have another open switch order (from different or same GRCP). So, there should be no conflict between SforB and Openreach rules for this scenario.

9.4. Attempt to cancel for breach of contract with open managed cease

It was noted in discussions in the Industry Process Group that if a customer has placed a transfer order with a GRCP, and the LRCP has thus been notified by Openreach of a managed cease order, it is not possible for the LRCP to initiate any cease order (e.g. due to a dunning process).

However, this is an existing issue, and SforB makes this no better or worse.

End of document