

Response to consultation on Making switching easier and more reliable for consumers by Adrian Kennard, Andrews & Arnold Ltd, Enterprise Court, Downmill Road, BRACKNEL, RG12 1QS

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Andrews & Arnold Ltd is a relatively small and somewhat specialised Internet Service provider that also provides telephony services (SIP and mobile) and well as providing WLR3 Openreach lines. We do not provide any Pay TV services at present.

Whilst we appreciate OFCOMs intentions in relation to more typical consumer Internet Access Services, Telephony, and Pay TV services, we are concerned that OFCOM fail to recognise that there are a number of more specialised services provided by companies like ourselves.

In particular OFCOM seem to see Internet Access Service as a generic utility in the same way as Gas or Electricity. This can use concerns and issues for specialised provides.

For example, the existing Notice of Transfer (NoT) process fails to even have cause codes for "Not an Internet Service" or even "Out of scope of NoT" (where end user is not a consumer or small business).

These proposals could easily leave situations where services are migrated/ceased without proper consultation with the losing provider on the implications. Not all services are the same.

The NoT process can, for example, be used to migrate a WLR line which is not being used to provide a telephony service, or a Generic Ethernet Access (GEA) service which is not being use to provide Internet Access.

As a small provider, we do not believe we have the same issues as experienced by consumers in the various OFCOM surveys. E.g. customers can cease services on-line and pick a date. We even have means to instantly reinstate services within a couple of days if the cease was a mistake. We do not really see that our customers are likely to benefit significantly from this new process.

However, we can see co-ordination between rival providers to manage cease of an existing service could be fraught with issues. Would such communication be by phone ? I really cannot imagine my staff sitting on hold to some call centre at a large ISP in order to advise them that their customer wishes to cease service, and if that is what we will have to do - we'll charge for that! If by email, how will ISPs authenticate the requests? If by some sort of standard API, who will co-ordinate this, define it, test it, etc. As an ISP we could not even give you a list of other ISPs, let alone know the number or web site or API that each would have for co-ordinating ceases of service. Simply compiling such a directory would have to fall to OFCOM - but we have seen that OFCOM could struggle to manage such a resource.

We see authentication as a big issue - either the losing ISP will have to call or otherwise contact their customer to confirm the request from the new ISP is genuine, or they will have to issue in advance some sort of Migration Authorisation Code which the new ISP can quote as proof that the new ISP is authorised to talk to them. Without this there is great risk of malicious and accidental ceases.

If such a system can be confined to moves between some of the key major consumer ISPs offering generic Internet Access, and not involve the smaller, specialist ISPs, that may be a workable system for the general good of consumers.

Even so, any OFCOM rules on this need to be careful in terms of what is to be "managed" as part of this process. If I personally was to want to "move" my Internet Access to Sky, would Sky be required by proposed rules to co-ordinate changing the routing for my IPv4 /24 PI and IPv6 /48 PI and loads of domain names? If not, would the existing ISP (A&A) be allowed to contact me and explain that I will lose these?

In summary - please consider small / specialised ISPs in any proposals, and consider exceptions to the general obligations on larger and more generic providers.