Title:

Ms

Forename:

Aileen

Surname:

Boyd

Representing:

Organisation

Organisation (if applicable):

SSE plc

Email:

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

SSE is an end-retailer in the communications retail market. We have always supported the harmonisation of switching processes onto a gaining provider led (GPL) solution with appropriate industry governance to ensure that processes are properly documented and run smoothly, as well as being subject to formal change control as they are developed to adapt to market and technology changes. An important aspect of governance, in our view, is that all parties are readily identifiable in industry flows, according to their role in the market.

A very important industry role is that of the retailer with responsibility for the contractual

relationship with domestic and small business end customers, as a range of General Conditions apply to this role. From the point of view of market monitoring for adherence to sales and marketing requirements, for example, which Ofcom has mentioned as one of its requirements in its switching consultations and statements, we believe it is crucial that end retailers can be unambiguously identified and that the code used to identify them is actively managed to provide a complete and comprehensive overview of which companies are undertaking this role. Current arrangements are not yielding reliable basic information on retailers - such as how many there are operating in the market. Part of the reason for this is the existence of long and diverse chains of separate wholesale service providers between the CP providing an access network (Openreach in this case) and the retailers providing retail services to end customers using the access network.

The industry has yet to engage, either within the Switching Process Implementation Group or outside this grouping, with the topic of how the harmonised switching process is to be governed after implementation. We would advocate that a market body be set up to manage various aspects of this including the management of RIDs. We would see Ofcom as having a role in interacting with that body if it retains the task of issuing RIDs under the auspices of the Numbering Plan. Both parties should have an interest in establishing an assurance framework to check that RIDs are validly used only by those to whom they have been assigned in order to reduce the risk of misrepresentation of which party is actually initiating switching flows on the market systems.

It seems sensible to amend the Numbering Plan itself to clarify what the RID code represents. The definition of a RID quoted from the Numbering Plan in the consultation paper refers to it identifying "a reseller of BT's wholesale services" while footnote 2 states that this "includes both reseller of wholesale services and a retail CP using resale services". These are two different roles in the market and we suggest that the definition is clarified and changed to refer only to a retail CP - with a separate definition and code structure for wholesalers to be developed as and when needed for governed market arrangements in the future. We are not aware of any need to identify wholesalers specifically in the current processes that use RIDs.

Question 1: What is your estimate of the number of RIDs that will be required by your downstream CPs who contract with end users, at the harmonisation date of 20 June 2015?:

This question is not applicable to SSE as we do not have 'downstream' CPs.

Question 2: What is your estimate of the total number of RIDs that will be required by the industry at the harmonisation date of 20 June 2015? On what basis have you reached this estimation?:

SSE has no actual industry information on which to base an estimate of the total number of RIDs that would be required if all retail-facing companies acquired a unique RID. We are concerned that the market cannot currently produce reliable information on the number and identity of retailers in the market and consider that this type of information should be readily available to Ofcom as the market regulator and ideally to other market participants as well. This links with points we have made under the heading of 'Additional Information' on the need for active management of RIDs under a governance framework for switching processes going forward.

Question 3a: Do you agree with our proposal to increase number of RIDs by changing the format of the code to a three character alphanumeric code, as per option 2?:

We agree with option 2, which preserves the 3 character code but allows it to become numeric as well as alphabetic in its make-up. Due to the fact that the currently available alphabetic codes have not been used up, we agree with Ofcom's intention to continue using up the alphabetic codes before using any numeric characters if this option is pursued, allowing CPs to plan relevant systems amendments at a later date if they wish.

Even if the total number of required RIDs seems unlikely at this stage to be greater than the number which can be accommodated using the 3 digit alphabetic code (15,625), if it is still a credible possibility that more codes than this could be needed, it seems prudent to enable the proposed expansion of available RID codes on the industry's planning horizon. This is preferable to having to introduce such a capacity change more quickly in the event that demand for the RID codes suddenly increased.

Question 3b: Please provide us with an indication of the scale of costs that Options 2 and 3 would entail.:

SSE is unlikely to see any material costs under either option 2 or 3 as, at present, our upstream wholesaler systems introduce RID codes for the industry flows resulting from customer switches we initiate.

Question 4: Are you aware of any other administrative purposes for which a three character alphanumeric code might be required or useful?:

Not currently.

Question 5: Do you have any comments on the proposed modifications to the Numbering Plan set out in Annex 3?:

We are content that the proposed modification to the Numbering Plan brings in the possibility to use numeric characters in the RID code in future, as set out in option 2. However, we are disappointed that the opportunity has not been taken to clarify the RID code definition so that it applies only to retailers, as discussed in the Additional Information section.