



openreach

Connecting you to your network

## Promoting competition and investment in fibre networks

**Measures to support Openreach's proposed  
trial in Salisbury – migrating customers to full  
fibre and withdrawing copper services**

6 September 2019

## Foreword

This response is provided by Openreach Limited<sup>1</sup>. Openreach is a wholesale network provider. We support more than 600 Communications Providers (CPs) to connect the 30 million UK homes and business to their networks. We sell our products and services to CPs so they can add their own products and provide their customers with bundled landline, mobile, broadband, TV and data services. Our services are available to everybody and our products have the same prices, terms and conditions, no matter who buys them.

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<sup>1</sup> Openreach Limited is a wholly-owned subsidiary of BT Group Plc.

## 1. General comments

Openreach welcomes Ofcom's consultation and its proposed agreement to our request for a regulatory waiver to our current regulatory obligations to support the FTTP Exchange Upgrade trial in Salisbury. We share with Ofcom and Government an ambition to upgrade UK telecoms infrastructure from copper to 'full fibre' and we are keen to ensure a smooth transition from copper-based services to fibre.

To take this forward, Openreach has been consulting its industry customers and other stakeholders on an exchange-based approach to copper retirement. On 21 March 2019, Openreach issued an industry consultation, 'An exchange-based approach to upgrading the UK's digital infrastructure with GEA-FTTP', which set out our proposed approach to the retirement of the copper network. On 17 June 2019 we issued a further industry consultation, covering proposals for trials of both FTTP Exchange Upgrade (in Salisbury) and Single Order Exchange Upgrade (in Mildenhall), which will enable Openreach and CPs to test migration processes and better understand the issues that will need to be addressed. This consultation closed on 7 August 2019 and industry respondents were generally supportive of our trial proposals, which we will be taking forward through further industry engagement. Ofcom's proposed regulatory waiver will enable Openreach to implement the Salisbury trial in a timely manner to enable us, our industry customers and wider stakeholders to test approaches to efficient and successful migration and capture key learnings to inform the wider copper retirement and All-IP programmes.

Ofcom notes that this consultation is focused on enabling the Salisbury trial rather than setting principles for the withdrawal of copper services more broadly across the country. We agree this is a sensible approach and we, with other stakeholders, will continue to engage with Ofcom on the new regulatory framework, to be introduced through the Fixed Telecoms Market Review from April 2021, which we would look to include enabling regulation to support the broader programme of copper retirement. We broadly support Ofcom's proposals on copper retirement in the recent Remedies consultation, although there are some important points of detail which we think need to be addressed. First, we are concerned about the practicality of Ofcom's suggestion that 100% exchange coverage is required in order to trigger the shift of regulatory focus. 100% 'fibre network' coverage is never likely to be achievable given the challenges of network build and gaining the necessary access. Second, it is important that we are able to implement 'stop sell' (that is, stopping adding new supply to the copper network) well in advance of the likely achievable end point. We have proposed 75% as a sensible trigger point to notify stop sell. We will continue to engage with Ofcom and all other stakeholders to develop workable and practical proposals that serve the needs of end-customers and, as indicated, the Salisbury trial will provide valuable learning.

## 2. Responses to consultation questions

Consultation question 1: Do you agree with our proposal to enable a stop sell for the Salisbury trial? Please provide reasons for your answer

We support Ofcom's proposal to enable a stop sell for the Salisbury trial. Introducing a stop sell policy, once there is sufficient fibre coverage, is an important part of our approach to this trial as it will encourage FTTP take-up and help

to trigger the migration of lines from copper-based services to full fibre, enabling industry to develop, test and trial the best approaches to migrating end customers and identifying and resolving 'edge cases'.

We note that Ofcom proposes the regulatory waiver to be effective from September 2020, which reflects Openreach's request to Ofcom and the trial timeline proposed in Openreach's 17 June consultation. However, we have now reviewed industry responses to our consultation and recognise that some CPs have asked for a delay to the implementation of stop sell to align with their own product development plans. On that basis, we will be proposing to implement stop-sell in December 2020, although we are not moving the end-date of the trial and we will be looking to introduce commercial offers in the trial area from late 2019 to encourage early migrations.

**Consultation question 2: Do you agree with the impacts of our proposals we have identified? Are there any further impacts that you consider we should be aware of?**

We agree with the high-level impacts on consumers, businesses and CPs that Ofcom has identified. Openreach is keen to work with industry and other customers through the Salisbury trial to understand all potential impacts in detail and agree mitigation strategies. The customer migration experience is a key success criteria for the trial and it is also recognised that additional support will be required for certain customer sectors including the vulnerable, businesses and Critical National Infrastructure (CNI) organisations.

Openreach recognises the importance of keeping vulnerable and CNI customers connected through the migration process: their identification, special services testing, public awareness, continuity of service, and fast reversion processes are all key elements to support them. The identification of a customer as vulnerable or CNI will be the responsibility of the CPs supplying the services, but Openreach recognises that not all vulnerable customers will have been identified and there may be a need to develop a process that can enable their identification through the migration process. Openreach will work with industry to understand what process support will be needed to support this need.

Openreach also recognises the specific requirements of business customers, including large UK-wide businesses, and issues such as the complexity of out of hours and parallel running options for business customer migrations. Openreach will be working with industry to fully understand the requirements of business customers and consider what developments may be required.

More broadly, Openreach recognises both the need to inform end customers of the programme work, and the benefits that an awareness and education campaign on the withdrawal of legacy products and the migration to fibre. Openreach will setup a public webpage during Q4 2019 with information that CPs can refer end customers to as a central resource. The website will offer high level information about the programme, information about the technologies and a series of FAQs covering what impacted end customers need to do. This will enable CPs to underpin their own communications to end customers. Openreach looks forward to working with CPs and other stakeholders through the industry working groups, and with the Broadband Stakeholder Group, the OTA, Ofcom and Government, to define the best approach to informing and educating the general public about the benefits of the move to full fibre. We are keen to use the Salisbury trial to test approaches to communications and raising public awareness.

Consultation question 3: Do you agree with our proposed approach to the protection of consumers within the trial? Please provide reasons for your answer.

As indicated above, Openreach recognises the need to protect consumers, particularly those identified as vulnerable, during the trial. Identifying issues and appropriate remedies, including not migrating lines or ensuring a return path to a former service, is a key learning we want to take from the trial so that we can agree industry-wide processes. As Ofcom indicates, the localised nature of the trial should enable issues to be identified and the appropriate measures deployed in a timely and pragmatic way, building on the constructive relationships being developed with the local councils and other agencies.

Consultation question 4: Do you think the monitoring data we are proposing Openreach provide to Ofcom is appropriate and sufficient? Is there any other information we should be collecting? Please provide reasons for your answers.

Collecting and reporting appropriate monitoring information will be a key output of the trial. We are developing our reporting capability along the lines proposed by Ofcom and will be looking to extend our measures set (both quantitative and qualitative) as the trial progresses to support our discussions with stakeholders on lessons for the broader copper retirement programme.