Ofcom consultation on upgrading broadband customers to superfast products

Changes to quality of service regulation on Openreach

TalkTalk response

December 2019

This is TalkTalk Group's response to Ofcom's consultation on changes to quality of service regulation on Openreach published on 25 November 2019.

1. TalkTalk agrees with Ofcom's proposal to exempt Generic Ethernet Access-Fibre to the Cabinet (GEA-FTTC) orders placed using Openreach's new 'Bulk Grouping provision capability' from the quality of service regulation relating to First Available Date (FAD) and the three associated KPIs (as detailed at paragraph 2.7 of the consultation). We agree that this exemption should apply for the remainder of the 2018-2021 market review period.

2. We have been closely involved in the development of the bulk provisioning capability with Openreach and industry. We note that the latest version of the bulk grouping process (Version 2.4) outlines the planned approach. The process will enable Communications Providers (CPs) to submit batches of orders at the same cabinet for delivery through bulk appointments. Bulk appointments will be scheduled by Openreach for between 14 and 24 days following the order. Delivery of bulk orders within this timeframe will be subject to a Service Level Agreement (SLA) between Openreach and CPs.

3. We consider that the 'Bulk Grouping provision capability' provides a more efficient means of managing upgrades to faster broadband lines and will enable Openreach and CPs to optimise their processes. The process does not allow Openreach to delay orders, rather it enables CPs to plan for bulk upgrades to be fulfilled within 14-24 days of the order date. Openreach can offer bulk upgrades at a lower price per line due to the operational efficiencies generated through the bulk grouping process.

4. We agree that Ofcom should monitor Openreach's service performance for the new bulk process. Tracking performance will be vital to enable assessment of how the process is working, to identify possible improvements and, also to highlight if Ofcom may need to impose additional standards relating to bulk orders in the next market review period.

5. We note that Openreach has offered to provide Ofcom with KPIs relating to the 'Bulk Grouping provision capability' on a voluntary basis. Openreach proposes to provide monthly reports on KPIs for the average FAD for bulk orders. In addition, we consider that it will be important to track installation performance and the incidence of faults associated with the bulk process. We therefore suggest Openreach should provide the following KPIs separately for the bulk process, in addition to reporting on the aggregates under the existing KPIs:

   - Percentage of installations delivered on agreed appointment date; and

   - Percentage of installations reported as faulty.

   All relevant KPIs should also be made available to CPs.