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Providers of legacy PSTN services

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PSTN switch off and migration to Voice over IP (VoIP)

I am contacting you as part of Ofcom's ongoing monitoring programme on the transition from analogue to digital landlines.

As I am sure you are aware, BT is planning to retire its public switched telephone network (PSTN) by 31 January 2027. This transition is necessary as PSTN technology is beyond its intended lifespan and is becoming increasingly unreliable. Ofcom is supportive of this migration to digital landlines as well as broader transitions to modern digital networks which will benefit consumers, businesses and the wider UK economy. Ofcom's role is to ensure that customers, particularly those that are vulnerable, are not subject to undue disruption and are protected from harm during the migration.

One year out from PSTN switch off, I wanted to remind you of the importance of clear and timely engagement with your customers, and of the obligations and expectations Ofcom has in place to protect consumers during the migration. The data we have access to suggests that you currently still provide a significant number of WLR, WLR Premium, and/or ISDN2 lines. We are therefore sending you this letter to remind you of our expectations of CPs during the final year of the transition.

Supporting vulnerable customers

As you may know, there are a range of implications for vulnerable consumers during the migration. Even where you resell lines to businesses and larger organisations, the end user can ultimately be vulnerable. For example, if lines are sold to a local authority who use them for telecare alarms in supported living accommodation.

In 2019, we published a document on the future of fixed telephone services, outlining our expectations of CPs at the time – including giving adequate notice of service changes, having clear and timely communications, and assessing customers' needs and offering help with migration.

Our General Conditions (GC) of Entitlement provide regulatory protections for consumers, two of which are particularly relevant to the migration:

- GC C5 requires providers to have clear and effective policies in place to make sure vulnerable customers are treated fairly and appropriately. Providers should understand the needs of vulnerable customers, communicate with them appropriately and in a timely fashion and make sure they get the support they need.
- GCs A3.2 requires availability to emergency services in the event of network breakdown.

Ofcom's 'Treating vulnerable customers fairly' guide suggests measures that providers can adopt to make sure they treat vulnerable customers fairly and give them the support, help and services they need. We expect you to take account of these obligations and expectations when seeking to identify and migrate vulnerable customer groups.

We note that the Telecare Advisory Board (TAB), convened by BT, is coordinating the telecoms industry, central and local government, and telecare alarm industry to identify telecare users through better data sharing. The Local Government Association is also seeking to connect its members with telecoms providers, to more effectively identify telecare users.

In addition, the Department of Innovation and Technology (DSIT) have published the PSTN charter along with a checklist for migrating customers. Several providers have already committed to following these processes. You may find these helpful in guiding your approach to migrating vulnerable consumers from the legacy network.

Calls to emergency services in a power cut

As you will be aware, digital landlines will not work during a power cut. To protect customers who are dependent upon their landline to contact emergency services, we have guidance in place under GC A3, which requires CPs to have at least one solution, such as a battery back-up unit, that enables customers to access emergency organisations for a minimum of one hour in the event of a power cut if they are landline dependent. We also note that some providers now offer battery back-up solutions that provide a longer period (of up to seven hours) of power back-up. We would encourage you to provide the most effective solution available, to help protect customers in the event of a power cut.

We note that the proportion of business customers who would be reliant on their business phone line as their sole method of contacting the emergency services in the event of a power cut is likely to be extremely small. However, if the customer is reliant on this phone line e.g. a sole trader working from home or a small office with no mobile signal, then it is likely to be proportionate to take steps to ensure that this customer has the protection that they require.

Businesses and CNI

Migrating businesses off the PSTN can also be complex, especially CNI customers (e.g., the energy, water and rail industries) and other businesses that use the PSTN to support non-voice devices such as alarms, telemetry and monitoring equipment. Some of this equipment may need to be reconfigured or replaced as some PSTN characteristics (e.g., line powering) may not be replicated by all-IP services.

We would also remind you to actively assess and identify whether you have any CNI customers. The Government has recently issued specific expectations of CPs where CNI assets are reliant on the PSTN or ISDN, and we understand that Openreach is in contact with industry about identifying relevant CNI lines. It is important that migration solutions are put in place in good time for CNI users. Therefore, as part of our monitoring process we request that you confirm with us whether you provide services to:

- Residential customers;
- Business customers; and/or,
- CNI customers.

If you have any questions about the content of this letter or would like to discuss a particular issue in relation to the transition, please do not hesitate to get in touch.

Yours faithfully,

Cristina Luna-Esteban