Assembly

CityFibre

Summary of consultation responses

Copper to fibre switchover

26 November 2020

Contents

Summary

Assembly consulted on issues surrounding the switchover from copper to fibre networks on behalf of CityFibre in November 2019 primarily to explore the requirements and process by which CPs can switchover customers from the copper network to CityFibre's full fibre network, and to understand from consumers what steps are needed to ensure easy and hassle-free switching.

Assembly has now considered all of the responses received to its consultation and it is clear that everyone recognises the challenges associated with switchover and the risks of getting it wrong. There is a strong appetite for a collaborative approach, involving a range of stakeholders. There is wide consensus around protecting consumers during the switchover, particularly the vulnerable, and possibilities to explore the development of a charter to ensure their journey is a smooth one. Areas where there was less agreement were on the threshold at which to migrate, and whether this should be an entirely voluntary process.

This document seeks to set out a summary of the key points made in response to the consultation which will form a critical part of CityFibre's planning to help meet the Government's target for 100% coverage of gigabit-capable broadband by 2025.

Introduction

Background to the consultation

The UK is at the start of a major upgrade of its fixed broadband infrastructure, replacing the outdated copper network through which most of our broadband services are currently delivered with future-proof ‘full fibre’ infrastructure. The rapid rollout of full fibre networks is a Government priority, targeting 100% coverage of gigabit-capable connectivity by 2025. Both its and Ofcom’s stated goal and strategic priority is to support competition and investment in fibre networks.

The widespread assumption is that all customers will migrate over time from the copper network to fibre and that this will allow the eventual retirement of the copper network. This would be no small task. The copper network serves many different purposes and supports a number of different services, including some which rely on the particular capabilities of a network with a ‘metallic path’ (the copper itself), for example to provide phantom power to devices connected to the network. Migration to full fibre services, and the ultimate withdrawal of copper services, will therefore take a huge collective effort from Government, Ofcom and the wider telecoms industry. The aim should be to ensure that all customer needs can be accommodated on fibre before retirement of the copper network starts. The process of migration from copper to fibre should be managed in such a way that it promotes infrastructure competition and protects the interests of consumers.

It’s therefore important to distinguish between copper “switch-off” (retiring the copper network) and “switchover” (moving customers over to new non-copper based networks). The Government has so far only expressed clear support for an industry-led copper “switchover”. Such a switchover should be pro-competitive, so processes are in place to support easy switching between networks. If not undertaken correctly the process could endanger competition and consumers.

CityFibre is in the process of rolling out full fibre networks that will provide connections to 8 million premises by 2025, and operate a wholesale-only, open access network and are therefore willing and able to switch existing CPs and their customers onto the network. In many parts of the UK it’s expected the CityFibre network to be the only network available, whilst elsewhere it’s expected the network will be constructed alongside other full fibre networks including that of Openreach. In either scenario, both CPs and consumers should have the choice of switching onto this alternative full fibre network.

Taking all of these factors into account, Assembly launched a consultation on the requirements and process by which CPs can switchover customers from the copper network to CityFibre’s newly-built full fibre network, and to understand from consumers what steps are needed to ensure easy and hassle-free switching.

What we consulted on

On 29 November 2019, we published "CityFibre consultation on: copper to fibre switchover" for public consultation. This consultation document contained a summary of the Government's connectivity targets and plans for full fibre rollout at the time, the current policy towards switchover, and Ofcom's approach to Openreach's switchover trial in Sailsbury.

The consultation identified a range of potential risks and complex challenges that need to be mitigated before switching users away from existing services to full fibre, and asked 18 specific questions which can be found at Annex 1. These divided into three sections:

- The general approach
- Switching from copper to CityFibre FTTP: the CP perspective
- Switching from copper to CityFibre FTTP: the consumer perspective

This document

This document represents a summary of the comments received by Assembly as a result of the consultation.

Consultation responses

The consultation opened on 29 November 2019 and the final closing date for responses was 6 March 2020. In all, 11 responses were received from a range of interested parties including communications providers and consumer groups, and even competing infrastructure builders. A list of respondents can be found at Annex 2. All non-confidential responses are available in full at assemblyresearch.co.uk/switchover. All respondents' comments have been taken into consideration when preparing this summary.

Responses were broadly in line with one another, very few questions produced polarised answers and as such substantive enough to draw some fully informed conclusions.

General overview

In general, respondents recognised the need to move the UK to a full fibre future, which offers consumers more reliable, faster connections. Most recognised that this migration wouldn't be without challenges and would require the industry, consumers, Ofcom and Government to play an active role and that it was important to debate these challenges.

CPs said that the transition from copper to fibre is the subject of much work across the industry and that it is important to ensure UK consumers both understand and are supported during this transition. There was strong support for a collaborative approach and even some suggestions that learnings from switchover trials should be shared across the industry.

Despite most of the consultation being aimed at CPs rather than competing infrastructure builders, Openreach did respond. They said each infrastructure provider needs to ensure migration processes and suitable replacement products on the new fibre platform are agreed to facilitate the switchover from copper to full fibre.

The final section of the consultation, the consumer perspective, was addressed by most respondents and it was unanimously stated that consumers should be supported during the transition so they are able to make well-informed choices. Respondents made it clear that consumers need to be taken along on the journey as the UK moves from copper to fibre. Consumers (particularly vulnerable consumers), should be made aware of any services that are delivered over copper today that can't be provided over full fibre. An industry agreed code of practice of charter may be helpful to protect consumers from potential harms.

How to communicate with consumers was also a key theme of the consultation, with a strong backing to retail service providers being the most appropriate route, but also calls for a public information campaign similar to that used for the switcher from analogue to digital TV.

Consumer groups rightly identified that ultimately the success of full fibre networks will be ensuring consumer demand for full fibre broadband services, which will require consumers to engage with the market. There was a feeling from some that the industry may need to build more effective incentives for this to materialise.

Detailed responses

> *A1. Do you agree that switchover from copper to fibre needs to be an industry-wide process, recognising that there will be multiple full fibre networks rolled out across the UK, and that there are inherent risks of leaving it to one operator?*

Given that switchover affects a number of stakeholders, all respondents agreed that it should be an industry-wide approach that is fair and reasonable, and as such shouldn't be left to one operator. TalkTalk Group noted that while the switchover to full fibre will be an industry-wide process, Openreach and its customers will have control over the process of retiring the legacy copper access lines, and that this is a matter for Openreach, its customers, and the regulator. Openreach stated that switchover is not being left to one operator, and that migration is already under way at premises where full fibre services are available.

BT said they expect switchover from Openreach to other fibre network operators to be driven by retail service provider's choice, and ultimately consumer choice. They also highlighted that cross-platform switching discussions are underway and being coordinated by the OTA – this is something that was picked up by other stakeholders later on in the consultation.

> *A2. How should switchover be managed? Can this be left to industry to self-regulate, or is there a role for Ofcom and/or Government to oversee the process and ensure competition and fairness for consumers, particularly vulnerable consumers?*

FCS, Inspira Technology Group Ltd, and Openreach all said that it should be a combination of industry, Government and regulator to ensure fairness. Commsworld said given this is a fundamental change to the way key services are provided, it cannot be left to industry alone to self-regulate, and as such it was vital that Government and regulator play a role. Openreach also suggested that the OTA should be part of the oversight. Aquiss took a different view and suggested that self regulation be given a chance.

BT said they have already proposed (in their response to consultations from Ofcom and Openreach), that the best way to ensure retail customers are served well and that vulnerable customers are protected, is through the development of a 'customer charter'. TalkTalk Group advocated a similar approach suggesting there would be value in agreeing a framework for sharing best practice between CPs, Openreach, CityFibre and other infrastructure providers to ensure consistent protections are in place for vulnerable customers and other special use cases. They went further to say they would like to see a clear public awareness strategy, including common messaging about the benefits of full fibre broadband in areas where it is available.

A3. Do you think there should there be consumer representation in the governance arrangements for managing switchover, to ensure that consumer issues are fully understood, and to ensure the consumer voice is heard?

All CPs said consumer representation would be vital given the switchover will affect consumers for years to come, and as such all the requirements and needs must be met during the program of switchover and their voices heard. The FCS also added that this should include suppliers and providers of specialist services, and those from the welfare sector. BT, and TalkTalk Group as part of their response to *Question A1*, said there should be a ‘customer charter’ to ensure transparent communications with end customers.

Openreach pointed out that various pan-industry groups were already working on this – for instance under the management of the OTA to establish a best practice guide for customer switchover, and that agreement could be reached through the Ofcom All IP steering group, which CityFibre is a part of. TalkTalk Group suggested that one option could be establishing workstreams to support, and report back to, the established meetings between the DCMS Secretary of State and the industry CEOs.

Citizens Advice started from the position that there is a clear role, and need, for strong consumer representation in the run up to and during copper swithover. While recognising the work that Which? has done so far in this area, they remain concerned about the lack of strong consumer representation in the governance arrangements for switchover.

They went on to suggest that the Government should legislate to create an independent statutory consumer advocate for telecoms, which would mean there were sufficient resources and dedicated funding for stronger consumer representation. They also likened the switchover from copper-to-fibre to that of smart-meter roll out, highlighting the delays that have been faced, increases in costs and loss of consumer trust during a complex infrastructure project. The organization pointed out that [full fibre] roll out will only be successful if consumers buy into the scheme and hence why it’s important to put consumer insight and needs as the heart of the process. Which? echoed these views and said they’d recently proposed the Government commissions a ‘Connectivity Taskforce’ which would include consumer and business groups to advise on strategic, evidence based approaches to help stimulate the demand for gigabit capable broadband connections.

A4. What mechanisms are needed to ensure a competitive, level playing field for switchover? For instance:

A4a. How would you like to see vulnerable consumers protected?

A4b. How should those who are unsure or refuse to switch be managed?

A4c. How can we ensure that investments in equipment located in the customer’s home (so called CPE), are not stranded?

Inspira Technology Group Ltd suggested that the switchover should follow a similar model to the digital TV switchover and TalkTalk Group (in response to *Question A2*), said there should be a public awareness campaign. Commsworld suggested similar, in that there should be strong communication through advertising campaigns and leaflets. The idea behind this approach being that there would be relatively few in the end who didn't see the benefit of switching. They said there should be a Government and regulator appointed taskforce specifically to deal with vulnerable users. They suggested the taskforce be made up of specially trained staff who would contact all those who will be impacted based on details provided to it by the operators. BT said that where full fibre doesn't support the services used by vulnerable customers, they should be switched back to WLR (where Openreach still supports it), as quickly and as seamlessly as possible. TalkTalk Group stated that the option to 'fallback' to copper if services such as care alarms do not work over fibre will require consideration between CPs and CityFibre as well as Openreach.

There were conflicting views on whether switchover should be mandatory or voluntary. Openreach and Vodafone both said that the initial focus needs to be on making the migration to full fibre a voluntary one with customers choosing to upgrade because of the perceived benefits of full fibre – i.e enhanced functionality, including speed and reliability. TalkTalk Group said that voluntary migrations should be maximised and CPs and network providers should work together to plan the approach to supporting customers who are reluctant or refuse to migrate and to minimise the levels of customer disruption. Business Solutions Ltd went further to suggest that in addition to prices for vulnerable consumers be capped, and that there should be a four year period for completing switchover, after which they would be forced to migrate and face any associated costs. Inspira Technology Group Ltd also said that there shouldn't be a choice to 'opt out' as this would increase cost and complexity. The FCS said that those unwilling to switch should be explained (verbally) the implications of switching, and be given adequate time to act voluntarily before any forced switching is done. Vodafone said any forced migration should be considered as a last resort, promoted only by network switch-off and the prospect of a loss of connectivity. BT said they don't believe customers should be forced off the copper network prior to the timelines proposed by Openreach.

With regards to CPE, Inspira Technology Group Ltd proposed that equipment in the home should be deployed and managed in a similar way to gas/electric meters – i.e. that they are serialised assets that remain property of the metering company and are not removed when the owner/occupier vacates the property. TalkTalk Group noted that in-home changes will be needed in all cases, new equipment will be required for many customers, and some customers will require different communication and/or support due to their existing set-up, including use of special services devices. They also pointed out that this applies equally to business customers.

> *B1. CityFibre's plan is to build out to whole towns and cities. We think this offers advantages to CPs in enabling coherent marketing and communications to customers. Do you agree?*

BT and TalkTalk Group agreed with this approach, saying that it would maximise the viability of retail service provider's above the line marketing campaigns and avoids the occurrence of local 'not spots' which would make messaging to consumers more difficult. The FCS said they underwood the logic for this plan and the potential advantages it brings customers. Inspira Technology Group Ltd strongly agreed with this plan, although caveated this with the suggestion that, particularly in challenging development areas, wholesalers could be allowed to place orders while whole areas aren't finished, but that these towns and cities are not advertised publicly by CityFibre until full deployment is complete.

As a competing fibre builder, Openreach noted that different infrastructure builders would be using different deployment approaches as would be expected in a competitive marketplace, and that their Fibre First programme combined deploying full fibre to whole towns and cities, but also to rural areas and at new housing developments. TalkTalk Group used this opportunity to raise the issue of overbuild. At a general level, they consider there will be greater consumer benefits from ensuring access to a first FTTP network than in using resources to overbuild and increase consumers' options for FTTP services. In light of this, they suggest policymakers such as Ofcom and DCMS should carefully consider whether they should promote overbuild, or if they have a preference for operators building in different areas.

B2. When should a switchover process commence? Is 75% the right threshold or should this be higher or lower?

Responses here were similar to those to *Question A4*. There was a divergence of views with regards to the appropriate approach and threshold. Openreach and Vodafone both believe the decision to migrate to full fibre must rest with the end user and that voluntary migration should be encouraged. Vodafone in particular stated that any forced migration must be considered as a last resort, promoted only by copper switch-off.

The FCS recognised the need to be consistent across the industry and suggested sticking with 75% given Openreach have chosen this threshold already. Business Solutions Ltd suggested it should be closer to 80% within a group (i.e. business of residential), Aquiss 85%. Wherehas others such as BT, Commsworld, and Inspira Technology Group Ltd said the threshold is largely irrelevant so long as there is no loss/degradation in service after switchover and that it should be driven by the choice of end users and in turn retail service providers. Commsworld said they'd prefer a gradual switchover when fibre is available opposed to a 'big bang' approach. Openreach seemed to echo this point by saying that the process of migrating should begin as soon as full fibre is available to order at a premises.

B3. What timescale is required for you to complete migration from copper to fibre? Is this affected by whether the target is switchover for the vast majority of customers, or 100% switchover, allowing copper to be retired/removed?

BT, Commsworld, and the FCS said this will vary between providers noting that most switchover will be voluntary and driven by consumer choice. Respondents suggested it could take up to 5 years for complete migration in an FTTP area. The FCS said that once the 75% threshold is reached then it would seem sensible to set a reasonable time limit to facilitate the removal of the copper network. TalkTalk Group elaborated further here suggesting It may be appropriate for Ofcom and Government to consider the impact of copper retirement, and the possibility of setting copper switch-off date(s), on the overall progress towards achieving the public policy goal of full FTTP roll-out and take-up in due course. Inspira Technology Group Ltd, were more prescriptive and set a timescale of a minimum of 6 months notice for this.

Openreach provided additional insight based on their rollout experience so far. They highlighted issues with the granting of wayleaves as a potential barrier to achieve 100% coverage of any area, and called on CityFibre to highlight such issues encountered by fibre builders in achieving high levels of coverage to Ofcom and Government.

> *B4. What are the range of products, delivered over full fibre, that CPs would require in order to facilitate migration of their existing customers?*

Most respondents said as many as can be provided. BT and FCS said they would expect to see a comparable range of bandwidth, service and price points (including service levels) that compare with existing offers available on Openreach's copper and fibre networks. BT specifically listed this as one of the key areas they would need further discussions with CityFibre if they were to use their network in the future. TalkTalk Group said they would like to see both a basic lower bandwidth/voice product from CityFibre and FTTP products with business-grade premium functionality.

> *B5. Would it be necessary to offer a voice-only service and/or an 'entry-level' capped broadband service?*

Business Solutions Ltd, Commsworld and TalkTalk Group all agreed that there should always be an entry-level capped service for both voice and broadband, noting that not all users have the same connectivity needs. Vodafone highlighted that lighter bandwidth users less interested in speed must also be catered for. The FCS said an entry-level broadband service would be needed so that customers could take a VoIP service. Inspira Technology Group Ltd pointed out that some of the elderly don't see the need for broadband and so a standard voice-only service should be available in those cases.

> *B6. Should an 'entry-level', low-speed fibre offering be priced at a comparable level to existing products to help migration?*

The majority of respondents agreed there should be an entry-level product. At times the responses to this question strayed into the concept of universal service for broadband, and even the role of the state in providing free broadband services. Ispira Technology Group Ltd noted that with more Government and public services moving online, there should be an affordable basic broadband product available (below 20Mbps) to ensure they don't get left behind. The FCS said it would not expect any of its members to be price disadvantaged as a result of switchover.

Business Solutions Ltd went further to suggest that there could be a basic [broadband] service offering speeds of 10Mbps free to all, and questioned even the need to move entirely away from copper, particularly for 'the last few yards'.

Which? provided useful evidence from research they had undertaken that found the promise of gigabit capable broadband services are unlikely to be a draw for many consumers, with many believing their current speed is sufficient for their needs. A significant proportion of consumers they asked agreed with the statement ‘my current broadband connection already meets my needs, so i would not want to upgrade to full fibre’. As such, Which? conclude that it may therefore be necessary to offer a wide range of speeds over the full fibre network to encourage consumers to migrate to speeds more akin to what they currently purchase.

> *B7. Are there any services currently provided by CPs for which there is no obvious means to replicate the service on a full fibre network – for example services that require phantom power over the copper network?*

BT, Openreach and Vodafone all said they’d expect all services that currently run on the copper networks to find suitable alternatives when switched over to full fibre and said that they were working with third parties to ensure they understood these implications. While not able to answer specifically, FCS highlighted that experience from the Openreach WLR withdrawal programme may suggest that such services may exist. Commsworld listed personal care alarms, passenger lifts, and some PDQ machines. TalkTalk Group included a mix of consumer and enterprise use cases including monitoring in remote locations (such as flood defences and rivers), and phantom powered helpline phones located at known suicide hotspots. Vodafone mentioned the need to ensure processes are in place to secure emergency call access in the event of a power cut, and that this was something industry can work together to manage.

> *C1. Do consumers see the need for a migration process from copper to fibre? What advantages do they see from migration?*

Most CPs did not answer this question, citing commercial sensitivity. Of those respondents that did, more than one suggested that consumers have been let down, or disappointed by the experience with the FTTC rollout – particularly in terms of performance. Business Solutions Ltd suggested that what consumers care most about is reliability, above speed – and when it comes to speed 10 – 20Mbps would be adequate for most consumers.

Consumer groups on the other hand were more optimistic. Which? began their response by stating that migration to full fibre offers consumers the opportunity for more reliable, faster connections that enable them to fully participate in the digital world in which we live. However they caveated this by saying that some consumers face barriers to engaging with the market, and as such may not be taking advantage of the opportunity to get a better service.

Which? research found that many consumers felt satisfied with their current broadband package and were not engaged sufficiently to seek out higher quality services. There were also concerns about increased and unexpected costs with moving to a new provider, with 63% of consumers worried it would cost them a lot more to have full fibre (even though Ofcom have found the cost difference to be relatively small). Ispira Technology Group Ltd also said that consumers were concerned with the perceived increase in price for full fibre.

Which? believes that addressing motivational barriers will be important to see the migration from copper to fibre and that from their previous experience, faster speeds alone were not a sufficient pull to engage.

C2. Who do customers prefer to be communicated through – the fibre network operators or the retail service providers?

BT, Commsworld, FCS, Inspira Technology Group Ltd, TalkTalk Group and Vodafone all said consumers preferred to be communicated with through retail service providers and this should be the primary communication route. Inspira Technology Group Ltd pointed out that particularly vulnerable consumers are unlikely to trust a company they've not heard of or don't have a relationship with.

Commsworld, the FCS, TalkTalk Group and Vodafone all suggested that it may be appropriate and necessary for fibre network operators to run general awareness and information campaigns in impacted areas. Vodafone said it would expect any such messaging to be agreed at an industry level, with the primary purpose of ensuring a consistent message is delivered to consumers. TalkTalk Group echoed this by saying they would like to explore the potential for a more coordinated cross-industry communications approach with Ofcom and Government.

On the other hand, Business Solutions Ltd suggested that after installation, customers tend not to care or think about who the provider or operator is, making a comparison to the way water is provided.

C3. What information do consumers require when choosing whether or not to migrate to fibre?

Most respondents provided non-exhaustive lists, but most included the need for clear pricing and rollout dates so they could plan their switchover and minimise time without a connection, and whether or not to plan for a visit by an engineer or other third party. Some, such as TalkTalk Group also suggested that some consumers will still need to be convinced to migrate, and as such should be told about the benefits of fibre, its reliability, lower fault rates and so on. Which? addressed these concerns at length and suggested there are motivational barriers and problems with engagement.

It was also pointed out that consumers should be given clear advice to follow for things that still communicate using the PSTN (personal car alarms etc.) – i.e. what the impact will be on their current services.

C4. How can switching processes be managed to minimise the cost and complexity of switching from copper to fibre?

The FCS suggested that existing processes proven to work should be adopted and reused wherever possible. Others stressed the importance of industry collaboration and good communication – in particular the need for fibre network operators to liaise closely with the relevant service provider to gain insights into their customer base. TalkTalk Group said a pre-planned migration strategy outlining which geographic areas will be built to and when would be helpful for their planning.

With regards to industry collaboration, BT highlighted the current industry discussions on cross-platform switching that are being coordinated by the OTA. Vodafone reiterated that this complex project needs industry cooperation and collaboration, and that it was important to get it right, rather than rush to meet any arbitrary deadline. Commsworld went further by suggesting there could be an underlying portal which all providers feed orders though.

Consumer groups such as Which? also stressed the importance of maintaining continuity of service during switchover, with research they'd conducted suggesting 45% of customers were worried about interruptions to their service during the full fibre installation process – a point that was made by others in response to *Question C3*.

C5. What current copper services do consumers require to be replicated on a full fibre network (for example care, home and security alarms)?

The general consensus was that all current services in the copper world should exist on the fibre network. There was a wide range of specific services listed which included security alarms, personal care alarms and some set-top boxes (e.g. Sky's). FCS also added river level and traffic monitoring systems.

BT went further, given their particular circumstances, to say that for them to be able to choose and consume CityFibre's full fibre, they would need to provide a service that meets BT's regulatory obligations in retail markets (e.g. voice USO).

C6. What are the particular needs of vulnerable consumer groups in a copper to fibre transition? How can these needs be safeguarded in an industry-wide transition process?

The majority of respondents recognised that some customer groups will clearly need particular care and attention, especially those reliant on existing networks for basic voice, telephone services or special services, but who are less technically aware. Most responses focused on ensuring that special services that vulnerable consumers use today still work – i.e. personal care alarms, and access to emergency services during power outages. BT went further to suggest that vulnerable customers may even require a superior level of service compared to non-vulnerable customers. The FCS referenced the 'Vulnerable Customer Best Practice' process that Vodafone was leading on across the industry. Other examples given included ensuring that any switchover that involved work carried out on the property should be done by experienced and insured professionals.

Inspira Technology Group Ltd gave some interesting practical suggestions for how some elderly customer's switchover should be managed. These included also speaking to the customer's relatives/people in a position of care to make sure they could be explained the process and that everyone was well informed – these customers should also be given access to a priority UK-based call centre to deal with any issues during the switchover.

Openreach went further by proposing that there is an important role for Ofcom and Government (local and central) both in helping to raise awareness with hard to reach customer groups, and in working with industry to ensure alignment and consistency.

In terms of responsibilities, Opnreach said the identification of a customer as vulnerable will be the responsibility of the CP supplying the services, but warned that not all vulnerable customers will have been identified and that that there may need to be a process developed that can enable their identification through the switchover process. BT and Vodafone said similar in that the industry must work together to help identify these customers (upfront as much as possible), and offer them consistent help when switchover occurs, and that more could be done here.

C7. Are consumers aware of the need for new CPE (for example new broadband routers)?

It was generally agreed that not all consumers are fully aware of the need for new CPE and the impact of moving to fibre this has, and that this should be part of the switchover dialogue. Inspira Technology Group Ltd suggested that those who don’t currently have an internet connection were more likely to be unaware that they will need new CPE for a basic phone service, or that they could possibly need a battery backup unit. They suggested that those more tech savvy would know. A majority of respondents stated that the product roadmap for CPE was the responsibility of the retail service provider.

TalkTalk Group said it’s essential that the customer is made aware of the new equipment that will be installed during both the initial sales and installation process. They also suggested that the form factor and aesthetics of this should meet industry norms and, more importantly, end-user expectations regarding ease of installation and aesthetics.

Business Solutions Ltd also raised the importance of recycling all those items that are replaced and that this should be considered as part of the switchover process.

Annex 1

Consultation questions

A1. Do you agree that switchover from copper to fibre needs to be an industry-wide process, recognising that there will be multiple full fibre networks rolled out across the UK, and that there are inherent risks of leaving it to one operator?

A2. How should switchover be managed? Can this be left to industry to self-regulate, or is there a role for Ofcom and/or Government to oversee the process and ensure competition and fairness for consumers, particularly vulnerable consumers?

A3. Do you think there should there be consumer representation in the governance arrangements for managing switchover, to ensure that consumer issues are fully understood, and to ensure the consumer voice is heard?

A4. What mechanisms are needed to ensure a competitive, level playing field for switchover? For instance:

A4a. How would you like to see vulnerable consumers protected?

A4b. How should those who are unsure or refuse to switch be managed?

A4c. How can we ensure that investments in equipment located in the customer's home (so called CPE), are not stranded?

B1. CityFibre's plan is to build out to whole towns and cities. We think this offers advantages to CPs in enabling coherent marketing and communications to customers. Do you agree?

B2. When should a switchover process commence? Is 75% the right threshold or should this be higher or lower?

B3. What timescale is required for you to complete migration from copper to fibre? Is this affected by whether the target is switchover for the vast majority of customers, or 100% switchover, allowing copper to be retired/removed?

B4. What are the range of products, delivered over full fibre, that CPs would require in order to facilitate migration of their existing customers?

B5. Would it be necessary to offer a voice-only service and/or an 'entry-level' capped broadband service?

B6. Should an 'entry-level', low-speed fibre offering be priced at a comparable level to existing products to help migration?

B7. Are there any services currently provided by CPs for which there is no obvious means to replicate the service on a full fibre network – for example services that require phantom power over the copper network?

C1. Do consumers see the need for a migration process from copper to fibre? What advantages do they see from migration?

C2. Who do customers prefer to be communicated through – the fibre network operators or the retail service providers?

C3. What information do consumers require when choosing whether or not to migrate to fibre?

C4. How can switching processes be managed to minimise the cost and complexity of switching from copper to fibre?

C5. What current copper services do consumers require to be replicated on a full fibre network (for example care, home and security alarms)?

C6. What are the particular needs of vulnerable consumer groups in a copper to fibre transition? How can these needs be safeguarded in an industry-wide transition process?

C7. Are consumers aware of the need for new CPE (for example new broadband routers)?

Annex 2

List of respondents

Assembly received 11 responses to the consultation in total. Non-confidential responses were received from:

- Aquiss Limited
- BT
- Business Solutions Ltd
- Citizens Advice
- Commsworld
- FCS
- Inspira Technology Group Ltd
- Openreach
- TalkTalk Group
- Vodafone
- Which?

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