

Salisbury & Mildenhall Post Implementation Review (PIR)

167 – FTTP Exchange Upgrade

168 - Single Order Exchange Upgrade

February 2024

V.1



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Executive Summary

The trials were successful in creating learning about end customer behaviour and the migration profile over time, but there were areas where more learning is needed

Trials objective

The purpose of the trials was to enable Openreach, CPs and the wider industry to develop learning in preparation for the UK-wide Stop Sell and subsequent withdrawal of WLR products

Objective for the PIR

The PIR objective is primarily to review the actions taken to achieve the objective of the trials. Throughout the trials, Openreach reacted to industry dynamics, and introduced new ways to learn. This PIR will set out the reasons for these decisions, as well as the behaviour demonstrated, and the recommendations and next steps to be taken

Summary

- The trials were very important in facilitating the steps to move from copper to All IP. They were successful in delivering a good level of migrations, highlighting key focus areas for WLR UK withdrawal and the Stop Sell programme going forward
- CP engagement increased to 96% as we approached final stages of the trial, leading to 96% of end customers being moved off WLR or exempted
- 42% of CPs were not engaged until the second forecast was requested in October 2022, meaning that Openreach leant in beyond initial intentions to ensure end customers were kept informed
- 75% of CPs who responded to the trial feedback felt that the trials had been a success, with 100% agreeing that the trials were useful for gathering learning
- Limited learning on vulnerable and CNI, since these were exempted, although c.25% of exempt lines did subsequently migrate to IP services
- Proportionally, WLR reduction success was similar in Salisbury and Mildenhall, and also similar when the All IP alternative was FTTP vs SOGEA
- Service measures on broadband were relatively successful, prompting 45% of previously non-responding customers to react. Voice measures were not impactful, with only a 9% response rate
- There was limited evidence of CPs trying innovative ways of engaging with end customers to migrate
- Publicising service measures had a significant effect on the migration run rate, more so than the activity itself
- Non-used lines were ceased in November 2023 with no issues raised
- A base of 4% of non-responding end customers remained on WLR in October 2023 - further work is needed on how to resolve this across industry.

Section 1: Trials overview



1.1 Trials' scope

Salisbury & Mildenhall – 2 separate trials

The trials were held in the Salisbury and Mildenhall exchange areas, and applied to all CPs, Wholesalers and Resellers operating in or planning to operate in those exchange areas – there was no opportunity to opt out.

The trials covered all business and residential end customer premises.

Salisbury was the first exchange where FTTP Priority Stop Sell was applied. This meant that for all properties where FTTP was available, only FTTP could be ordered. Where FTTP wasn't available, CPs could order any other available product.

Mildenhall was used to trial the WLR Stop Sell rules. This ruleset restricted the ordering of WLR products at a premises where either SOGEA or FTTP was available. Where neither FTTP nor SOGEA were available at a premises, orders could be placed for all available products.

CPs were encouraged to migrate end customers served by WLR products onto FTTP or SOGEA, depending on availability at the premises. The intention was to also include SOTAP when launched for those premises where there was no FTTP or SOGEA, however the product was not launched until December 2023.



Learning

- All engaged parties learnt in well and spent significant time and effort in working through issues and challenges
- It may have been useful to have more trial areas to test different scenarios and migrate more customers whilst putting in the effort
- It was beneficial to test two different rule sets in the trials

1.2 Timeline

The trials were agile and continued to evolve over the timeline to gain the most learning

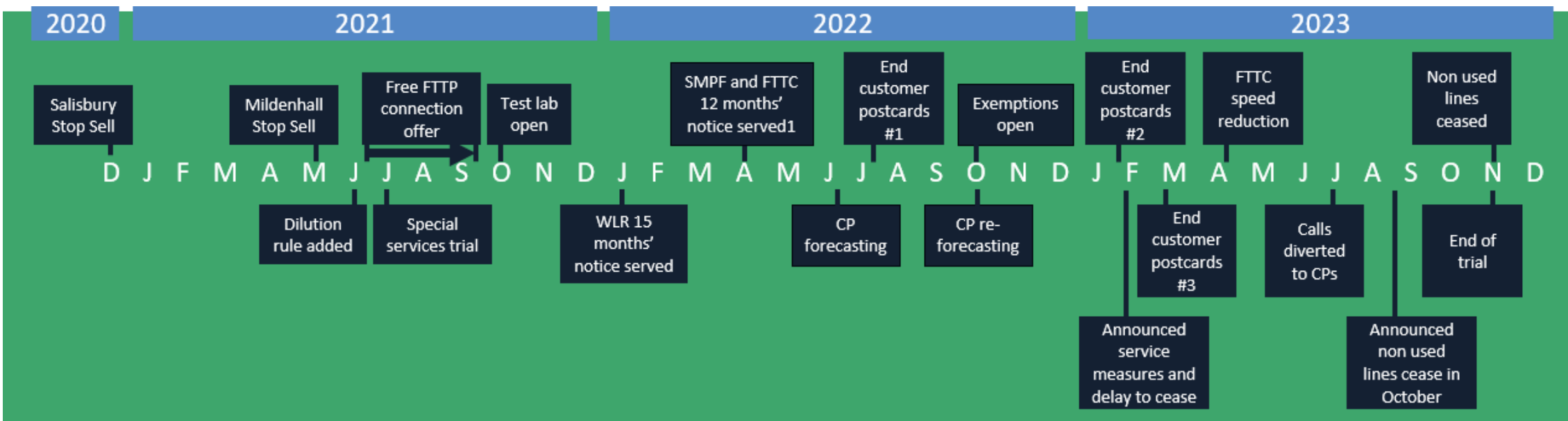
Initial Timeline

At the start of the trials, the key dates were set for Stop Sell of WLR, with December 2020 being the date for Salisbury, and May 2021 being the date for Mildenhall. The trials were set to complete in December 2022.



Final Timeline

Over the course of the trials, activities were added due to external requirements, and decisions to try new ways of learning.



1.3 Date changes

The end trials' dates were moved to encourage additional learning and reduce risk to end customers

The initial indicative end trials' dates of December 2022 was amended to April 2023

A key movement in timelines was the decision to delay the end of the trials from April to October 2023. This was communicated to industry at the end of January 2023, after Openreach had assessed that the current volume in the trials was too high a risk for ceasing projected volumes. Instead of moving the date, the plan communicated was to insert activities which would give extra learning as well as prompting end customers to contact their CP. Here the service degradation measures were explained, as well as confirming that the date to end the trials would be no sooner than 5 October 2023. Service degradation and ceasing are covered in section 8.

Openreach has had much feedback, both directly and indirectly about the movement of the dates and activities in the trials. Whilst moving dates was less than ideal, changes were undertaken with the following considerations:

- We wanted to ensure appropriate protection for vulnerable end customers
- PSTN was not being closed in the trial areas, and therefore there was no hard reason to not be flexible
- We were looking to learn; by implementing not just date changes, but different actions including service degradation, we picked up a great deal of learning
- End customers would ultimately have to deal with the consequences of any cease; it was important that the number was not excessive, and that customers were not put at risk
- Due this being a localised and not UK-wide trial, the level of general public awareness was low on the WLR withdrawal, therefore there was a higher risk that end customers were not aware
- CPs had not met their own forecasts for migrating customers and therefore the volume of customers made the projected ceasing in April 2023 too risky for Openreach and CPs

Learning

CP feedback on moving the dates for the trials has been mixed

"Understood the reasons for this and supported not cutting services off in April"

"The change in deadline demonstrated how difficult it has been to move customers despite all parties' best efforts."

"CPs didn't receive enough notice of this extension, however, at first we welcomed the extension and the Openreach degradation measures, this felt like the first action that Openreach were taking to help CPs."

"Although a little confusing as we had to change the wording to our customers, it was the right decision and it's appreciated that things weren't just cut off. I do think this may lead to lazy behaviour for the Dec2025 withdrawal as people may assume the same is going to happen"

"This didn't help as Openreach went back on their word and didn't cease customers"

"Poor! Should not have happened and OR should have communicated this earlier"

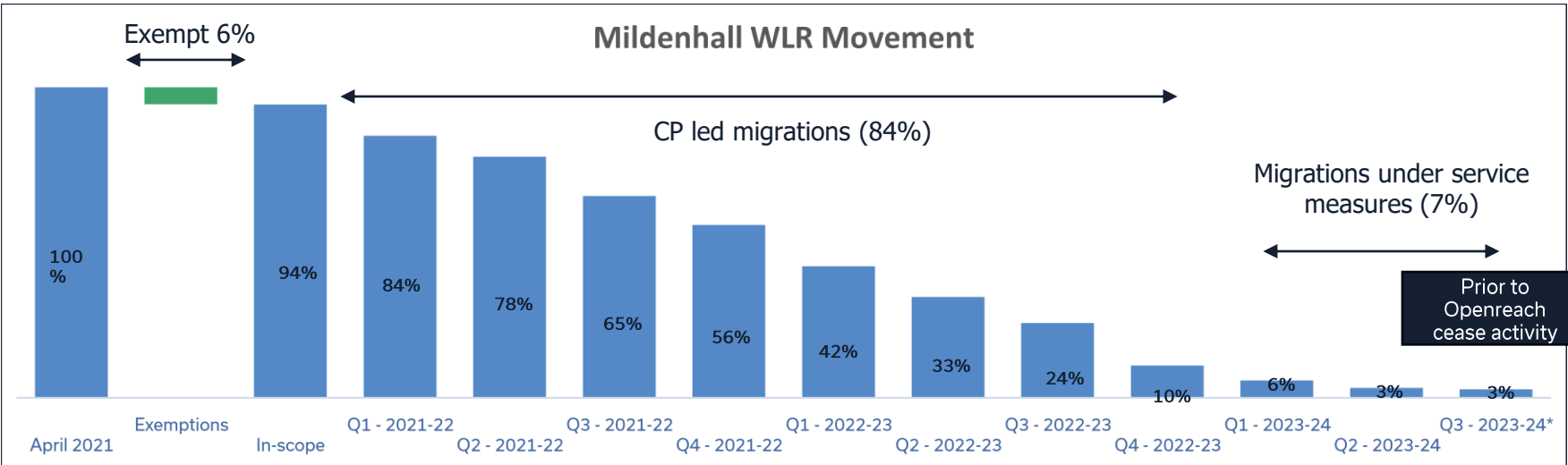
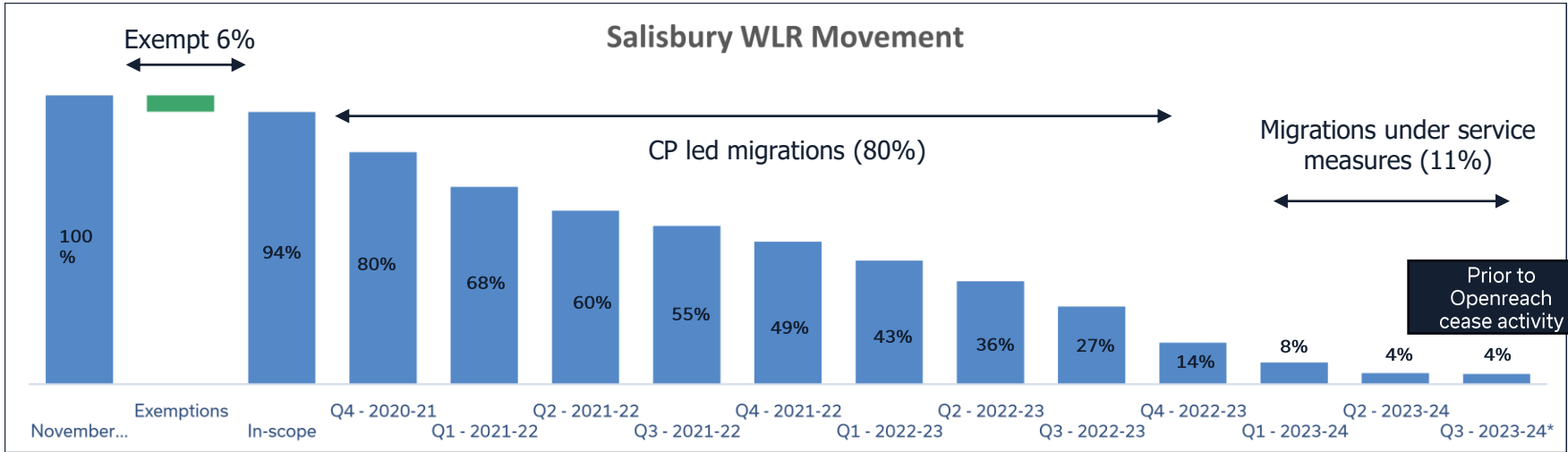
"Dented your credibility"

"Whereas the extension allowed more time to migrate it has lead some CPs to think this will be the same approach in 2025 and will lead to the 2025 date being extended and therefore remove the urgency to take action now."

"I think changing the rules partway through the trial exchanges somewhat confused things when we very early on advised what was going to happen only for it change the nearer we got to the end goal. Appreciate not wanting to cut customers off but changing the rules gave some of our partners more resistance that they did not need to engage etc"

1.4 Trials numbers

96% of lines had moved off WLR or were exempt by the end of the trials



Learning

Despite being quite different trials, the migration patterns of both Salisbury and Mildenhall were closely mirrored.

Initial high demand driven by end customer during pandemic 'work from home' phase

Slow middle period as concerns grew around migrating vulnerable customers after storm Arwen

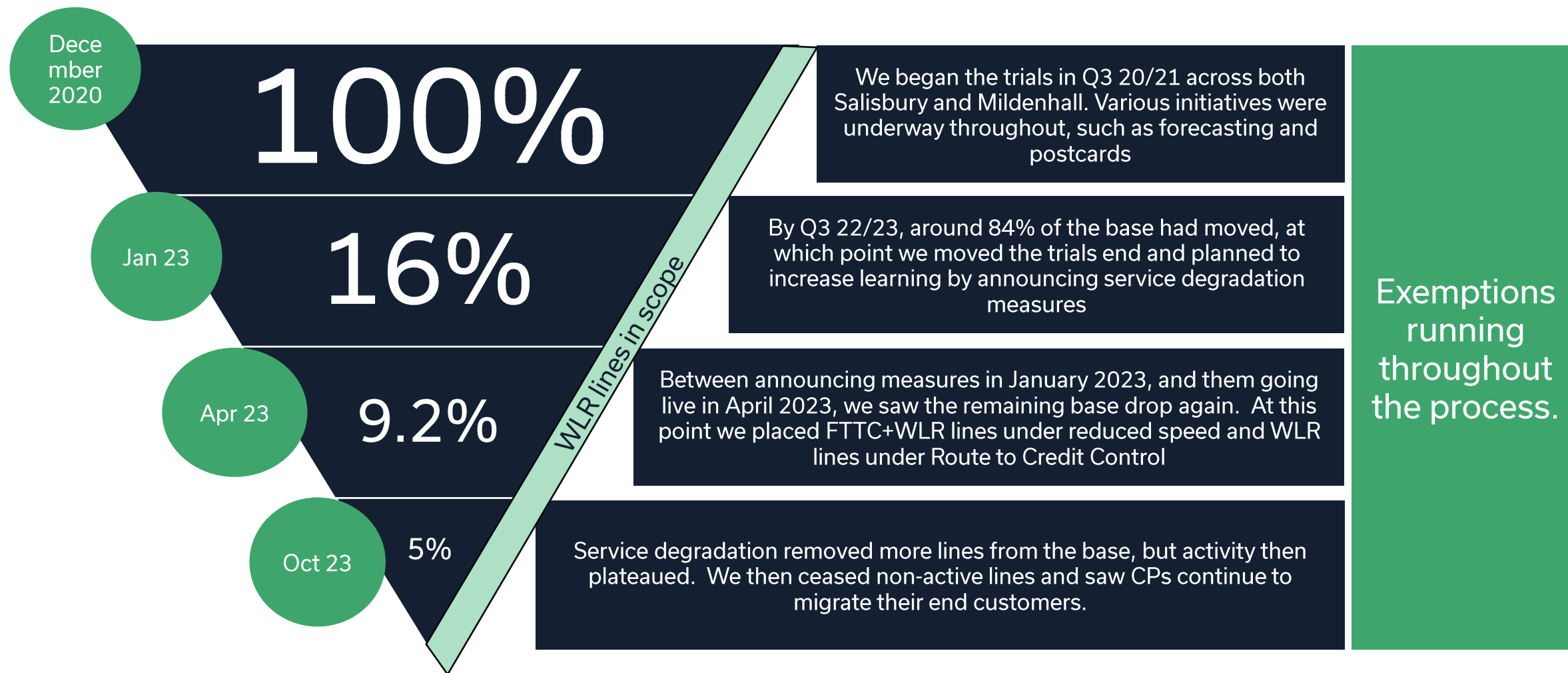
To support this Openreach implemented its exemption policy to protect these customers

Announcement of service measures prompted large response from CPs with highest migration period in the weeks leading up to implementation

Application of service measures themselves had a much smaller impact on migrations

1.5 Numbers at key inflection points

84% of the WLR base moved by CPs taking their own actions and pre any service degradations



Section 2: Commercial



2.1 Contract termination letters

Contract letters were sent to give notice to terminate contracts for assets in Salisbury and Mildenhall

We sent notices to affected CPs using the termination notice under the relevant contracts. These are no less than 15 months for WLR and 12 months for GEA and LLU

We sent notices at key points during the trials period, including when it was extended, where CPs continue to have assets in Salisbury and Mildenhall

Learning

CP feedback was that it would be better for them to have both WLR and any associated broadband contract termination notice received at the same time, despite them having different notification periods

2.2 Operational impact

Openreach field teams flexed to ensure good availability of resources

The trials in Salisbury and Mildenhall changed the work mix and required balancing in the operational teams, mainly Service Delivery (SD). While both patches had to adjust, the bigger changes were seen in Salisbury due to the shift to FTTP as the primary technology.

To accommodate the increase in FTTP orders and subsequent decline in other work flows the team:

- rebalanced appointment books
- reviewed the capacity plan with the forecast
- ramped up contractor deployment
- moved direct labour resource to and from neighbouring patches

Lead-times and other performance metrics in the Salisbury area remained similar to the UK wide performance.

Learning

Team needed to balance resource across all operational business units to generate efficiency including Chief Engineers, Service Delivery FTTP team, Service Delivery volume team, FND and contractors

Good use of internal discussions on expected volumes allowed aligning the resource plan to incorporate the anticipated change in work mix

The CP forecasting was inaccurate across both trials – with CP feedback that this was due to this being geographic patches rather than cross UK.

The balancing of work across all operational business units is not scalable and therefore CP forecasts will need to be at a higher level of accuracy.

During the trial, the mix of work shifted with more FTTP than 'pretrial' state, less frames and copper and less FTTC.

2.3 Incentives

Incentives in the trials were not utilised by CPs

In Q3 19/20, we took a commercial offering to industry to support CPs in gathering momentum in the trial areas.

The indicative offer was:

WLR (including voice only, with SMPF and with FTTC) and MPF (including solus MPF or with FTTC) lines migrating to target technologies in the trials' areas would receive:

- No charge for self-install or cheapest connection available (may include bulk options where appropriate)
- No increase of rental charges for 12-18 months for closest available bandwidth product on the target technology (12 months opening position i.e. customers would continue to pay the same rental charges for 12 months and then pay the rental charges associated with the target product)
- No charge for Left-In-Jumper recovery, ceasing tie cables or associated Early Termination Charges

Whilst CPs had asked for additional commercial support and responded positively to the offer, ultimately we had no CPs take up the offer.

CP feedback on commercials:

"FTTP needs to be cheaper, and I don't mean make the old services cost more."

"Our business have spent significant sums in managing the sales engagement for little return. Whilst ARPU's are generally lower for the substitute products, the greatest OPEX incurred has been the additional efforts required to manage dial out campaigns, field sales and events in small geographies. This had little impact on the base, but had an opportunity cost elsewhere on other campaigns running across the business."

"Additional customer incentives might be needed to get customers to move."

"commercials are fair."

Learning

The learning was that highly specific offers to target small footprints, where impact would always be relatively small, would not drive the desired effect as the financial upside would not be enough to impact CPs' plans

Question as to whether the timing of the incentives was too early, and was before CPs getting into the detail of the trials

Resellers were maybe reliant on wholesalers passing down any offer benefits

2.4 Salisbury Stop Sell

FTTP Priority Stop Sell rules and implementation

Salisbury was the first exchange where the FTTP Priority Stop Sell rules were applied. This was successfully deployed on 1 December 2020, and meant that at all premises where FTTP was available, FTTP was the only product that could be ordered. Where FTTP was not available at a premises, no Stop Sell restrictions were applied.

Dilution rules were introduced for FTTP Priority Stop Sell, so that for end customers with an active FTTC or SOGEA service, where FTTP was available at a premises, they could:

- Change CP and remain on a GEA-FTTC 40/10 or SOGEA 40/10 service
- Migrate existing GEA-FTTC 40/10 to SOGEA 40/10 (same CP)
- Modify the bandwidth of an existing GEA-FTTC or SOGEA product speed to 40/10

We later implemented further dilution rules, in support of cohorts where FTTP was not considered a suitable voice product replacement, such as for vulnerable end customers and CNL voice-only lines. From July 2022 CPs were able to order the SOGEA 0.5Mb product in FTTP Priority Exchanges at premises where FTTP was available.

We also created an exception process so that any premises that would incur CP charges above the FTTP installation fee, known as ECCs (Excess Construction Charges), would qualify for an exception to be granted at the premises. The exception triggers the removal of FTTP Priority Exchange Stop Sell rules and allows any available product to be ordered.

Learning

Salisbury's Stop Sell rules worked well to get FTTP take up in the area where FTTP was available

As of 8 December 2023, there were another 537 exchanges which were live with the same rules. This has given CPs the opportunity to gain learning and apply them correctly their journeys.

The exception process works well, with CPs able to ask for orders to be placed in specific examples, and this has also enabled some rules to be amended over time as we discover where the policy is preventing correct behaviour.

2.5 Mildenhall Stop Sell

Copper Stop Sell rules and implementation

In Mildenhall, a different set of rules were applied, for the purposes of trialling the WLR UK Stop Sell ruleset, targeted at an exchange where the level of FTTP coverage was lower than 75% but there was a good availability of SOGEA.

The WLR Stop Sell rules applied in Mildenhall prevented the acceptance of any orders for the WLR product, where either FTTP or SOGEA was available to order at the premises, with the exception of:

- Novations for all WLR products
- Provision of WLR lines at Hotsites, Non-Served Premises, Short Duration Lines, and Complex Sites

In Mildenhall, where neither FTTP nor SOGEA was available at a premises, no Stop Sell rules were applied.

The FTTP Priority Stop Sell rules that were applied in Salisbury were subsequently rolled out to hundreds more exchanges, as per the plans for industry.

There was no intent to apply the Mildenhall WLR Stop Sell rules to any exchanges beyond Mildenhall, and having WLR Stop Sell rules active in a single exchange prior to UK Stop Sell, did reduce the learning opportunities about this ruleset.

Learning

CPs did not always understand the Stop Sell rules and at times had to rework their design assumptions to ensure their systems were consuming the change correctly

Volumes in Mildenhall were insufficient to allow full understanding of how WLR Withdrawal implementation would work with all possible scenarios. This was picked up during the September 2023 full WLR UK Stop Sell.

Mildenhall exchange was observed to have low order volume and low rate of end customer activity, meaning typical CP behaviour was not observable during the trial. This limited the learning opportunity around WLR Stop Sell rules and their effectiveness.

2.6 Exceptions

Minimal usage of exceptions within the trials

Exceptions enable CPs to order a product which would otherwise not be allowed under the rule set. There are 4 categories:

1. Within the market there are no Openreach product journeys currently available
2. A request based on the CP's product availability
3. The end customer equipment is not IP-compatible
4. Where the CP has made attempts to migrate and extraordinary Openreach circumstances have arisen

In Salisbury only 11 exceptions were requested, with 6 granted by Openreach and 5 rejected.
In Mildenhall only 6 exceptions were requested, with 4 granted by Openreach and 2 rejected.

Learning

The exceptions process was used minimally in the trials to provide products which would not otherwise have been allowed via the policy.

Exceptions have been used more widely outside the trials for FTTP Priority Stop Sell exchanges.

2.7 New products

New product variants were made available during the trials

A number of products/new product variants were to be developed to support the overall programme and be available in trials timescales.

The 2 key developments were:

- a) a low bandwidth (500kbit/s symmetric) offering on GEA-FTTP and SOGEA, to primarily meet the needs of voice-only customers, and;
- b) SOTAP, which would be available at premises where Openreach had neither FTTP or SOGEA availability

The GEA-FTTP low bandwidth product launched on 23 March 2020. The SOGEA low bandwidth product launched on 3 July 2020.

SOTAP was intended to be launched (at least in trials) in time for Mildenhall's Stop Sell. This did not happen as no CP had product development plans in place to meet this timescale.

SOTAP has since launched on 1 December 2023.

Learning

CP consumption of new products is varied, and something to monitor going forward.

Section 3: Communications Providers



3.1 Openreach support

Migration manager support to CPs in the trials and beyond

Openreach set up a 'Managed Migrations' function within the All IP programme team. This function supported account teams in customer discussions about the All IP trials. The function had 3 FTEs to support the CPs that provided services in the 2 exchange areas. Their responsibilities were to ensure that CPs:

- Were supported with queries and information where appropriate
- Engaged with the All IP programme and trials
- Developed their product offerings
- Forecasted and then achieved their target for migration/cessation of lines
- Reported back on their migration initiatives for mutual learning
- Understood the consequences of being behind on their migration forecasts and took appropriate remedial action

Larger CPs had 1:1 or 1:2 support through the trials. Longer tail CPs with fewer assets were grouped and supported by a single migration manager.

Feedback for the Migration managers has been very positive – see CP feedback section (3.3)

Learning

CPs benefit from having a single point of contact on specific projects / programmes such as the Salisbury and Mildenhall trials

3.2 CP behaviours

CPs varied in effort and activity across the trials period

A variety of approaches were taken to engage with and educate end customers on what action was required. Written comms including postcards, letters (some recorded delivery) and bill inserts all delivered periodically over the course of ~12 months. Outbound call campaigns were undertaken by CPs with significant bases in an attempt to make direct contact with end users.

Some of the largest CPs also hosted face to face events inviting their remaining base in the trial areas to attend townhalls. This was carried out in conjunction with a mobile information centre in high footfall areas of the town/city centres.

For CPs with particularly complex bases, individual teams were established to identify, validate and manage the migration to All IP with considerable success.

The exemption process highlighted discrepancies in inventory data and the ability of CPs to accurately identify the available technology at a premises level.

A small number of CPs took a firmer stance on end customers who had not migrated and elected to issue contract termination notifications with services subsequently ceased.

Some CPs with smaller WLR bases did very little in terms of migrating customers, perhaps wanting to retain as much revenue from their bases as possible, and for some CPs where they had no alternative All IP products to upgrade their end customers to.

It was clear towards the end of the trials that a subset of end customers were incredibly unlikely to engage with the process. In an attempt to contact this hard-to-reach cohort a small number of CPs embarked on a door knocking campaign.

Learning

A variety of methods to engage with end customers was attempted by CPs but not all avenues were fully explored. The use of SMS messaging to account holders was not widely utilised, nor the option of forced SOGEA migration for those end customers with existing compatible equipment.

Service degradation initiated by the CP was largely dismissed, but it may have been more effective than Openreach-driven service degradation, since CPs have more control over the available bandwidth and end customer conversations.

CPs' behaviour was influenced by Openreach's decisions to extend the trials beyond their original end date, and to alter the action which was taken upon the trials' conclusion. This led to some animosity between engaged and non-engaged CPs.

Split CPs was raised as an issue where one CP was the WLR owner, but they consumed broadband via a wholesaler

3.3 CP Engagement

CPs displayed a range of behaviour and levels of engagement

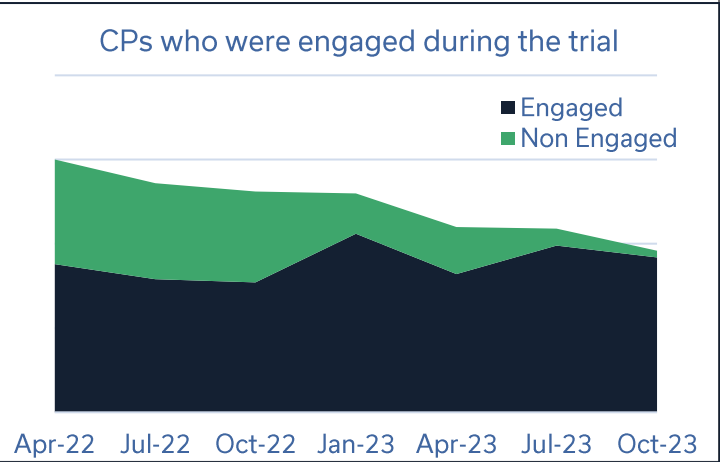
As per Openreach support in section 3.1, there was a large difference across the size of the CPs who had assets in the trials. The largest CPs had most support, but all CPs had access to migration manager support. With the smaller CPs, Openreach interacted by setting up calls where needed and largely by reactive emails and proactive discussions where information / action was needed by the migration manager or the business development manager (BDM).

We were heavily reliant on CPs keeping us up to date with contact changes within their own companies, and at times we had new people within the CPs who needed extra support to understand the programme. Some CPs created migration teams and/or a dedicated person, while some others didn't want to engage with us, or felt they didn't need to engage. We also encouraged our CPs to come onto our industry call to share learnings.

As part of the trials, we measured engaged v non engaged CPs. The definition used was whether a CP had shared a trials forecast, and later, whether they were in discussion with Openreach about their plans for migration.

In our regular dialogue with Ofcom, we discussed how to best engage with all CPs, and therefore building confidence that end customers were receiving good communications with their CP. We proactively communicated with non engaged CPs' customers to reduce the risk of them not being aware of the potential consequence of not migrating. Ofcom also sent a letter to all non engaged CPs during the programme, which was a helpful prompt to have more conversations

Over the course of the trials, the number of CPs decreased as some successfully migrated their base to All IP.



Learning

The % of CPs who engaged rose from 59% in April 2022, to 82% in January 2023, to 96% in October 2023.

We tried various methods to engage with CPs, but some were happy to be part of the trials without support.

The trials were in place to gather learning and proof points for ways of migrating end customers, to gain this we needed engagement of CPs to share their findings. We very much appreciated the CPs who leant in and worked with us in the trials. We need to work through how we engage with a much larger base of CPs in the UK withdrawal programme, and Exchange Exit.

3.4 Forecasting

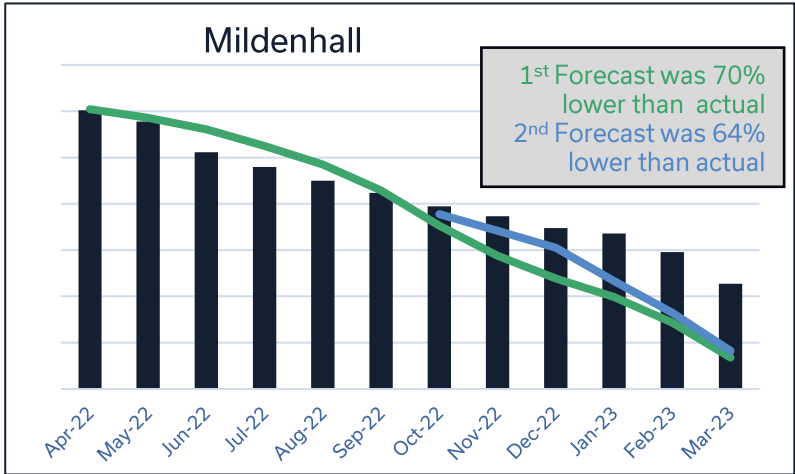
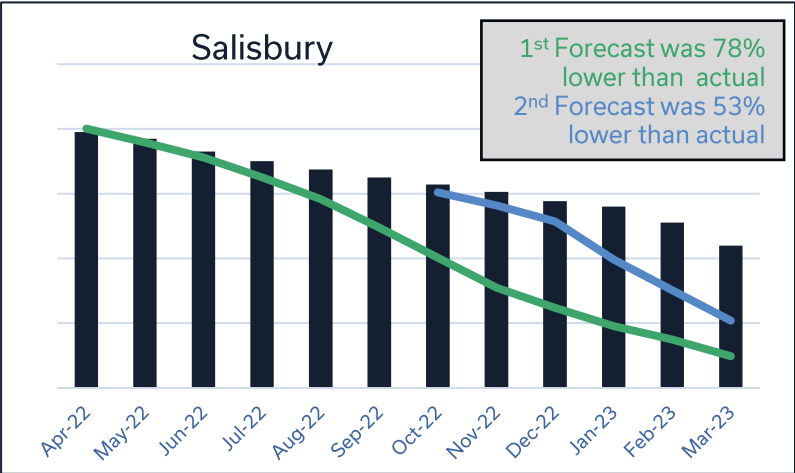
Forecasts were used in the trials to predict resource required

CPs were asked to provide migration plans in both July and November of 2022. This had a number of purposes: to seek the engagement of CPs, to show CPs the importance of having a plan, to enable Openreach forecast fulfilment work better, and to track CPs delivery against their forecasts.

In February 2022 every WLR trials CP was requested to supply a monthly WLR forecast for remaining lines to the end of the trial (April 2023). There was an 8-week period to submit. The forecast template was simple and high-level to ensure maximum returns. Key outcome was to engage with CPs, and the return timeframe was extended to July 2022.

We explained the process on various industry fora as well as the FCS monthly call.

We repeated this activity in October 2022; however, the key focus was accuracy. The opportunity to apply for exemptions was added to the process. This aided planning to a firmer number, removing lines which could not be migrated. We used the forecasts for internal discussions on resource required. To encourage accuracy, we stipulated that where we saw forecasts that were off-track within a given tolerance, we would look to reach out to end customers in the form of postcards.



Learning

Forecasting was helpful for gauging engagement, upskilling CP knowledge, and understanding the plans of the CPs to migrate over time or leave till later in the trial.

Forecasting accuracy was poor and did not support capacity planning as we would have liked. 1st forecasts were 78% and 70% lower than the actual volumes in Salisbury in Mildenhall, and 2nd forecasts were 53% and 64% lower respectively.

The second round of forecasting introduced the ability to request exemptions – this was useful to understand the true number of expected migrations and started the process for some CPs to analyse their base.

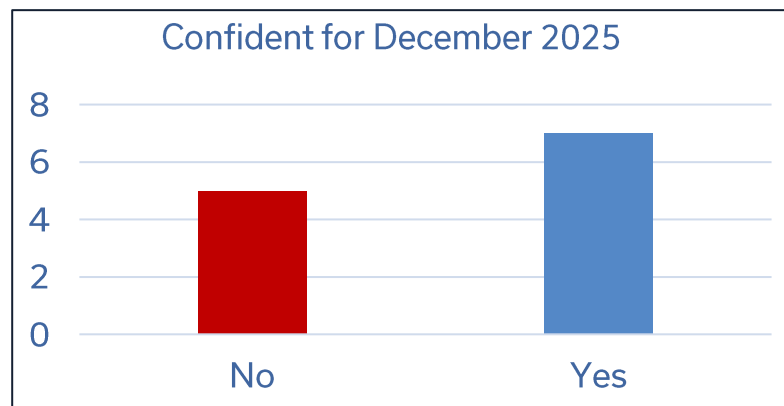
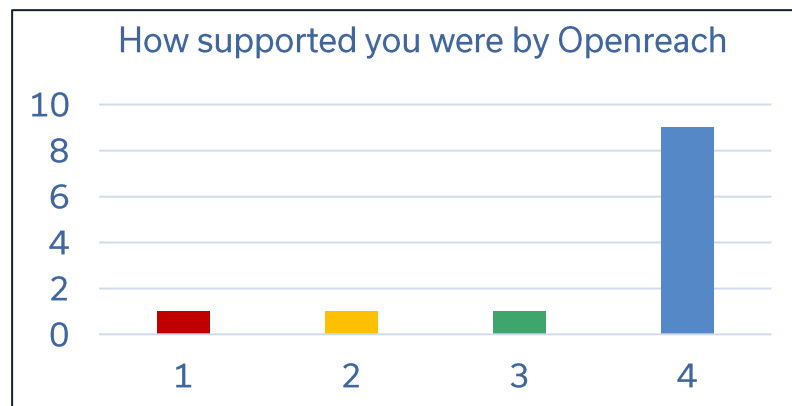
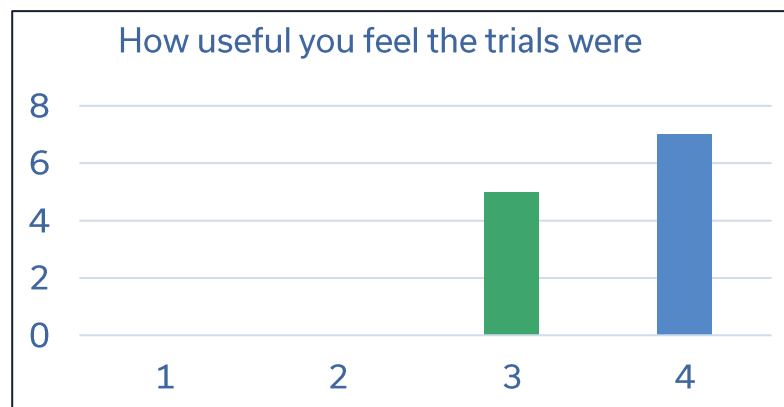
Forecasting inaccuracy was deemed to be largely due to the nature of the trials being specific to regions rather than cross UK.

3.5 CP Feedback

We had 12 responses from 11 CPs, covering most of the trial base CPs

Following the conclusion of the trials CPs were asked to provide feedback on how it went, their confidence levels after the trials, and whether they had any recommendations.

1= low, 4 = high



Comments to explain the scores are shared in the following slides in section 3.5

Learning

CPs have regularly given feedback and challenges throughout the trial, in order to learn and progress more quickly.

The feedback provided as part of this PIR has been very useful, and will be used going forward.

We acknowledge the feedback on the areas which were not covered or experienced in the trial and the areas that need more focus in the near future (including vulnerable, CNI and complex).

Reviewing the feedback, it's been interesting to see the differences in opinions, showing that different ways of working will work for some CPs and not for others.

In the trials Openreach had the opportunities to insert extra activities, and feedback has helped us to understand the impact on CPs

3.5.1 CP Feedback

How successful do you feel the trials were?

Overall, how successful do you feel the trials were? (1=very unsuccessful, 4=very successful)



"The trials were a success throughout the marketing, engagement and notifications period. We learnt which sales, marketing and field techniques worked in driving customer engagement. The only disappointment was that the downstream ceases across both active and inactive customers was not fulfilled. We identified this as an opportunity to inform a wider end of network policy for 2025."

"Communications with end customers still failed and customers felt pushed into making a decision. Different messages were going to the customers from different CPs, which caused confusion. As Openreach have gone back on their word on ceasing services I don't see how this could be a success, as it has made CPs look bad and has created brand damage, as we have been asked to force migrate people, but the message now is it's fine they can have a "pre digital phone line". This should have been announced at the beginning of the trials, not the end!"

"We only had a limited number of customers in the Salisbury area, which all seemed to migrate smoothly"

"For Salisbury we managed to move most of our customers off WLR...not the same for Mildenhall."

"Although we did not have a big estate in these areas, the changes have all go through smoothly"

"You had to delay it so it hasn't been a great result, installing replacement FTTP has been really challenging."

"The time and effort it has taken to get to this point has been considerable, and we are now only 1.5 years away from WLR being fully withdrawn. It feels like the trials should have either finished sooner or the UK stop sell and final withdrawal should have been pushed out. There doesn't seem to be enough time between closing the trials, adapting and implementing any learning and the end game.

"The trials raised a number of areas to address which is great. It also shows that there is a large amount of lines in service where customers have no idea what they are used for. On the downside - the trial did extend, which has added further doubt as to the extension of the stop sell in 2025"

"Consistently informed - although dates did change, and terminations didn't go ahead as planned - I think it was the right decision."

"I do think the Trial could have been better planned as it was soon as you push out the dates it creates doubt it will happen. We took the Trial very seriously, and it was a 2-year project where we led the way on the Trial from the offset and closed off with no customers impacted with learning applied."

"I only have 5 lines in Salisbury and none in Mildenhall, none of my lines can have FTTP, however my ISP claimed they could and placed orders with Openreach that subsequently were timed out."

"It was a good bit of insight overall, but with how the rules changed over time it was hard to continue shaping the narrative with our Partner base as it brought challenges from them and doubt"

3.5.2 CP Feedback

How useful did you find the trials to gather learnings?

How useful did you find the trials to gather learnings for the upgrade to All IP? (1=not very useful, 4=very useful)



"It has made us realise that the message is quite hard to land and there is a level of customer apathy / lack of response."

We don't believe CNI processes have been tested in any volume in the two trial exchanges. We think it would be good to align any learning with feedback emerging from the NI Exchange Exit trials.

This has helped us understand how to approach the 5 (now 3) Pilot exchanges, and that if Openreach have done what they can in Salisbury & Mildenhall then it could be done in other exchanges going forwards

"Made it simpler to discuss with customers outside of the catchment on what to expect"

"It was useful to test the provision journeys, ensure we had the full range of products (and variant features) available, and test the exceptions and exemptions processes. We do feel that exceptions and exemptions rules need to be simplified, and that the automation of such is necessary to scale."

"It was good test the methodology we had. It was NOT easy and took a lot of engagement with sales and line-by-line management. The scalability to our full base using that approach would NOT work - so good learning."

"It has enabled us to draw up clearer plans for the big switch-off and to get realistic expectations on customer engagement."

"It has been difficult to identify and develop the right processes to address specific customer needs, for example those dependent on a telecare health device or classed as Critical National Infrastructure. Whilst work is now underway to develop processes, we feel that this work should have been done much earlier as these customers have complex needs and will now be "back ended" in the move to All IP.

"Helped us work out what we needed to be on top of for the bigger switch off"

"It was good to see how much it cost us as a business and the lack of understanding from the customers"

"we were able to simulate the process"

3.5.3 CP Feedback

How supported by Openreach have you felt in the trials?



- "All IP migrations team are very helpful and responsive"
- "Our designated Openreach representatives throughout the programme have always responded quickly and professionally to any query that we have had. However, the manner in which Openreach have carried out these trials cannot be repeated. As a CP we have frequently been given information with short notice regarding policy changes, which in turn has caused unmitigable legal challenges for the programme. We also feel that a nationwide media campaign would have been useful to trial from Openreach, possibly supported by the government."
- "The team have been great, the actual rollout and install of FTTP is poor and the commercials should be more compelling so they see value in moving."
- "Openreach were very good at sharing data at regular points"
- "Always there and willing to help...they have been flexible in timing and supporting in terms of exceptions."
- "Via the Copper Transition sessions always felt informed"

3.5.4 CP Feedback

Openreach product availability

"Overall, the Openreach fibre footprint was sufficient for the trials"

"In terms of FTTP availability it's bad. Loads of sites can't do SoGEA either so we are stuck selling ADSL2+ when most third parties are not keen on selling SoADSL. You should have done this project when availability was much better than it is."

"No issues on this...only very few of our customers in Salisbury can't get FTTP"

"There are clear gaps in the solutions needed to help vulnerable and CNI customers move to All IP"

"Product transition did not throw up anything that was a show-stopper"

"As expected - good. Delivery times were a challenge due to engineer availability - noting the wider stop sell and need to migrate services"

"Taking too long to release Sotap"

"This is getting better however we keep on seeing issues with FTTP availability for businesses as residential has been prioritised"

"Lack of access for some customers meant we had to apply the exemption processes."

"Fibre roll out needs to be quicker"

Openreach exemptions

"Good acknowledgment of the requirements and suitable processes put in place"

"It is not solving the issue it is pushing it down the road"

"Exemption processes was understood and clear."

"This has really helped us to keep the wheels moving"

"It was good to have this process in place for the trial, but we think it may have hampered learning as no vulnerable or CNI customers were migrated in any volume. Nonetheless the process was clear and well managed."

"I found Openreach to be proactive with us in terms of customers being awarded "exemption status" and were very generous in terms of applying this status to a number of Mildenhall customers that we could not move."

"The exemption submission process was straightforward and we always received a quick response from the Openreach representatives. However, the guidelines and criteria for what constituted an exemption could have been clearer. Our sales teams found the policies incredibly complex, and we can only recommend that they are simplified for a mass scale closure".

"This works well."

3.5.5 CP Feedback

Forecasting

"the forecast template was a good idea - it forced us as a business to look at what's ahead."

"It's ok for a high-level view of what is going on, but it doesn't count for much."

"There were two forecast positions with Openreach, but due to the uncertainty in how the base would react to the sale engagement techniques, it was hard to determine an accurate response."

"It was easy to complete, but as our migrations were back-ended we aren't sure it was all that helpful"

"This was hard, and we struggled internally to agree on timelines for customer engagement - and it is hard to predict the impact of any engagement."

"Simple"

What could you as a CP have done differently?

"Ideally we should have had some of the key products ready."

"Have had the journeys in place to support Mildenhall migrations. This was a key failing for us."

"Nothing. I feel our partner communication and data sharing including EU marketing support was best in class".

"Engaged our management team on All IP Programme earlier"

"Started moving more customers a few years back - however the technology wasn't available "

"Not much - we did a great job, and a good blend of migrations vs ceases and customers were NOT impacted."

"Increased marketing communications"

"Been more forceful with customers, apart from that not much else. We have been sending regular comms, made personal contact, offered incentivised pricing (to our cost) but we can't MAKE them do something they don't want to."

3.5.6 CP Feedback

CP key learnings

"To wait longer for clearer messages from Openreach. and slow start to transform base on re-signs rather than proactively "

"Openreach dropped a ball in the way it was managed, we are miles ahead of our peers and still struggled to get customers engaged. "

"We put a lot of money into marketing WLR removal in Salisbury (and undertook some face-to-face activity) - this didn't seem to have any material impact in terms of customer response. It feels like, instead of trying to sell the benefits of customers to upgrade, it will have more effect to lead with service messages (and 'scaring' customers around a potential loss of service). "

"The other point is that this closure process shines a light on the data quality (both within Openreach and within CPs) and this is an extremely manual and laborious task. It makes me worried for the much larger volumes for WLR closure."

"This is going to be very hard...a large volume of customers are apathetic and it is not clear whether they are reading the comms."

"The approach we used to a small sample of customers IS NOT scalable to the full base. However, did create customers to make a decision and early thinking of All-IP for Dec-25"

"The number of customers / CPs where there is NO engagement (even after multiple comms attempts)."

"Understanding how to manage customers' expectations and what impact it may have on my staff"

"The process we followed for just two exchanges is not scalable to complete the full WLR exit by December 2025. So, despite the undoubted benefits of a dedicated account manager, it is not repeatable for an exit at scale"

"Understanding the impact of the variety of marketing approaches we have undertaken, managing churn/retention expectations, identifying CFU trends for customer engagement and the need for OR to define a consistent and downstream cease policy. We also recommend that OR cease directly and cannot replicate the approach used moving circuits to dummy accounts. This caused terrible customer experience with downstream comms being produced and customer calls into our service centre."

"how to manage and forecast our customers through their All IP upgrade"

"Generally works smoothly and helped us work out where process bottlenecks might be internally"

"Installing FTTP is disproportionately difficult in some locations, also some of your engineers won't let us install more than one in the same location."

3.5.7 CP Feedback

What could Openreach have done differently

"Potentially offer resellers marketing support to spread the message for organisations that run on a small budget"

"Better comms to industry, clear guidelines on all aspects of the trials, set a defined and definitive closure plan well in advance and then commit to it, degrade all eligible circuits not just a hand-picked selection. Stop changing scope during a trial and see it through"

"Increase speed of fibre roll out"

"Do this when you were ready, not be ready after you announce it. Could have rolled out alternative products to a higher proportion of sites earlier, stuck to the original dates and priced new products better."

"Slowed down and given a clear end goal at the start"

"Handle the delay. It should not have happened if the 12 months communications was issued on-time"

"Cross-industry communications strategy. It has been difficult to engage customers and despite our and Openreach's best efforts there are still a number of customers remaining on WLR. We think it is time to consider a cross-industry communications strategy to support WLR withdrawal that takes account of FTTP priority exchanges and stop-sells. We expect that we will need tailored approaches to cover FTTP priority exchanges/non-FTTP exchanges (and there may be other categories too). A further trial activity might be needed to develop the approach, including engagement with local government stakeholders/consumer groups etc. Any campaign should take account of digital voice messaging."

"Given more commercial incentives for CPs to act quicker"

What did we get right?

"Ran the trial, you managed well up until the original date of cease and tested the sales journey processes. Everything post the date change, degradation we believe was rather reactive and caused challenges, and reduced the value of the trial."

"Having a dedicated migration manager has been invaluable, particularly over the past few months as she has helped us manage the exit of our WLR lines from the two trial exchanges. Her attention to detail in providing the tracking spreadsheets, regular review calls and availability as an escalation point into Openreach colleagues, has ensured we remained focussed on the task in hand, which has not been insignificant despite it only being two exchanges"

"From my personal and professional perspective, I would say YES"

"The Large forum updates this was a good way to understand the next steps"

"Regular engagement and always contactable"

"Running a trial. Sharing data as promptly as possible. Customer letter drops and public awareness."

"Was flexible around the exemptions and trial closure dates (and didn't cut off a lot of customers!)."

"Regular supply of data"

3.5.8 CP Feedback

As a result of the trials are you more confident in migrating your customers to All IP by December 2025

As a result of the trials are you now more confident in migrating your WLR customers to All IP by December 2025?

54%
Yes

45%
No

"Due to development work we still need to do and the number of lines that we have to migrate in the next 24 months"

"It was hard to migrate low volumes of customers and we believe the current processes are not scalable. "

"We are confident, I selected Yes."

"I am confident, though appreciate that snags will come along to bite both parties on the backside at times"

"We are confident"

"It was not scalable to across the UK. "

"I am confident"

Section 4: Customer cohorts

A technician wearing a white hard hat and a high-visibility yellow and green safety vest is kneeling in a grassy field. They are working on a laptop that is placed on a yellow and black equipment case. The laptop is connected to a large green metal utility cabinet that has its door open, revealing internal wiring and components. The scene is set outdoors in a grassy area with some buildings visible in the background under a clear blue sky. A large green circular graphic is overlaid on the left side of the image, partially obscuring the technician.

4.1 Vulnerable end customers

End customers with special services were mainly exempt in the trials

In July 2021, Openreach announced to industry that it would like to start on a trial to help understand the best way to migrate end customers who had special services, including, but not limited to telecare devices. After much discussion with CPs, this ultimately led to the submission of an SOR for Prove Telecare which is currently in development.

Other journeys built to support vulnerable customers included:

- VRI within Premium
- ProveIP (scope amended during the trial period)
- Install UPS

Vulnerable end customers were the biggest consideration when discussing risks and mitigations to migrating and the end state.

The exemptions process gave an opportunity for CPs to protect vulnerable end customers from service degradation and ceasing, but that also meant that our learning was limited due to less migrations being attempted.

CP feedback

"We have no clients in this area that fitted this criteria there needs to be more development in industry on product solution here but we are making good progress"

"This is supported very well by the all IP migration team"

"Openreach were very flexible in terms of exempting customers who were (potentially) vulnerable due to their age."

Learning

There is no industry definition for vulnerable end customers, and CPs applied different criteria to each other.

We don't receive information about vulnerability of CPs' customers, as we don't normally require this information. Therefore for the trials we have no further insight into the volume of exemptions for principle 3.

CP events with older customers have highlighted the varying level of technological understanding and competence amongst that cohort. We shouldn't, therefore, presume that age is a precursor to not wanting or being able to migrate.

4.2 CNI (Critical National Infrastructure) and complex

There was limited learning for CNI with the majority of lines exempted

There were no replacement FTTP product variants available for use within the timelines of the trials for Short Duration lines or for lines at Non-Served Premises lines.

As there was no CP migration pathway for these cohorts of lines, these lines were exempt from migration.

CP feedback

"We didn't have many complex migrations. The key was it stimulated future customer migration thinking with our customers"

"This is supported very well by the all IP migration team"

"There is no clear process for larger migrations e.g. a large shop and this has meant we have had to use project services which is expensive and not scalable."

"We didn't identify many complex migrations. Complexity normally arises from multiple products closing across the same account, across geographies. As this was generally a single line, single product and single geography, it was managed within the customer estate, and did not drive a multi-site conversation which is far harder to manage through sales and delivery."

"We used internal systems and methods to identify the variety of CNI tiered customers within the inventory. We kept a close eye on these customers and circuits throughout the trials, driving the conversations between the account managers and customers."

Learning

There was a lack of learning in the trials for CNI. The trials team did not specifically focus on CNI and therefore any learning was left to CPs to share. This learning will be picked up in the exchange exit pilots and then shared across industry.

4.3 Exemptions

The exemptions process created a safety net for CPs and end customers

Principles used to grant exemptions:

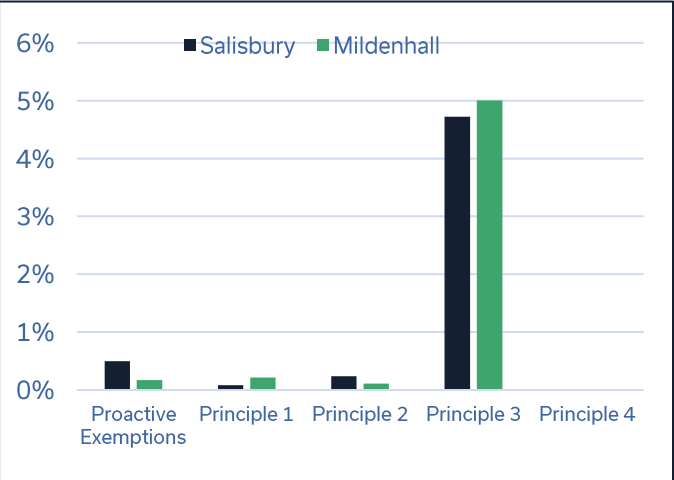
1. Within the market there are no Openreach product journeys currently available that would enable the end customer to move from their current product to an All-IP product – this also includes a cease and re-provide journey
2. Exemption requests that relate to CP product availability will be considered. Requests of this nature will require the CP to provide a definitive date upon when the product will be available. If a delay occurs with the associated product launch, then the CP will be required to formally request an extension to the agreement. Requests of this nature may not be accepted
3. The end customer has non-All-IP compatible equipment such as equipment that is critical to their health and/or the safety of the public connected to the line or is critical to business operation. And supplier, or manufacturer documentation confirms incompatibility
4. Where attempts have been made by the CP to migrate and extraordinary Openreach circumstances have arisen which prevent the migration

The exemptions process was implemented in October 2022 in order to allow CPs to remove specific end customers from any service measures or cessation. They were first introduced as part of the October forecasting, and subsequently would be reviewed when submitted to the respective migration manager.

Given that the trials were to be used as a learning opportunity, it was agreed that exemptions were the right route to understand where end customers couldn't move to All IP rather than to aim for a zero WLR base, this also reduced risks where there were no solutions.

At the end of the trials, we have around 5% of the base with an agreed exemption. Of the total exemptions, principle 3 was used the most, with 87% of all exemptions, citing “vulnerable customers” as the reason.

Over the last 6 months of the trials, we saw the exemptions reduce by around 25% as those in the principle 3 Category migrated to All IP.



Learnings

Some CPs used the exemption process to mitigate risks for a specific cohort of customers rather than on an individual customer basis. This was proved by the exemptions number reducing (especially for principle 3 which was mainly used for “vulnerable” customers.)

Principle 3 saw the biggest movement downwards as CPs had further individual conversations with end customers and deemed that they could indeed me migrated.

A number of exemptions were requested for assets outside of the Salisbury and Mildenhall trial areas showing that CPs appear to rely on area codes as an indication of exchange and in some cases hold incorrect records

Section 5: External Stakeholders



5.1 OFCOM, OTA, DSIT and FCS

Wider stakeholders gave challenge and support, to further improve the trials

Ofcom (Regulator for the communications services)

As part of the All IP Programme we have engaged across the trial period with Ofcom on monthly calls. We have kept Ofcom up to date with all activity and shared information on trial data and CP engagement.

Ofcom has given useful feedback on the steps that Openreach was considering at various parts of the trials. Ofcom wrote out to CPs who were not engaging - this was very useful and saw some of those CPs subsequently engage with Openreach.

OTA (Office of Telecoms Adjudicator)

We have fortnightly regular calls with the OTA, as well as ad-hoc discussions. The OTA chair the All IP Steering Board, bringing CPs and Openreach together to constructively work through achieving the programme aims with a balanced approach. An example of collaboration with the OTA was during the planning for service degradation measures, the OTA were part of the planning and thinking of what would work for CPs, Openreach, and the end customers.

DSIT (Government Department for Science, Innovation and Technology)

Quarterly and ad hoc sessions with DSIT to share information about the programme and the challenges being faced. Sessions have been useful, and the government have published information on their website to support the programme.

FCS (Federation of Communication Services)

The FCS have been a key advocate for the smaller CPs, bringing their voice to Openreach fora and direct discussions. They have invited Openreach to their regular CSP calls with members, which has been helpful in getting messages to and feedback from their members who may be either direct or indirect resellers of Openreach products.

Learning

All external organisations have taken time to listen to updates and provide appropriate feedback including challenges along the way to ensure robustness of solutions and different perspective thinking.

5.2 Local Authorities (Councils)

Openreach engaged with Wiltshire and Suffolk county councils

Openreach made contact with Wiltshire Council where Salisbury is located and Suffolk County Council where Mildenhall is located to raise awareness of the PSTN switch off in their areas. Where possible, regular calls were held, and collateral was produced and uploaded to the council website for business and vulnerable communities.

We also ran a joint campaign with Wiltshire council. The council ran social media content and updates in newsletters – coinciding with Openreach end customer postcards. Wiltshire county council (for Salisbury) were engaged and working together to put out communications about the programme in their regular local updates to residents and businesses in Salisbury.

Suffolk county council (Mildenhall) were less engaged, despite reaching out to several people in their organisation. Their telecare services were provided over the mobile network, therefore they felt that they were covered and did not need to collaborate with Openreach in the trials.

It became clear that Local Authority Engagement is very dependent on the individual in the Council, some of whom became very engaged and understood how they could support not only their own Estate of products, but also their own community and Openreach provided collateral for both the Council to use for their own products and to reach out to their community using existing newsletters and online media.

Learning

Engagement with Local Authorities are key, as they have their own estate, which is a microcosm of most devices and lines impacted by the programme. They also have reach into the community and are a trusted voice.

The engagement is dependent on the willingness of the individuals who work for the Councils as the All IP programme is often an extra part of an already busy role.

Engaging with key contacts in the region has been positive and shown benefits where it has worked.

5.2 Local Authorities (Councils) – social media posts



5.3 Charities

Charities were approached for help designing end customer messaging

When creating collateral linked to end customer contact a group of charities were consulted to comment, offer feedback and consult on the process.

Age UK, Isle of Wight, Age UK, Wiltshire, Age UK, National Office, RNID, RNIB, Pan Disability, Communications Consumer Panel.

Focus group was set up by AgeUK gave the following learning from attendees in regard to the postcards:

- They were not aware who Openreach were
- They did not understand All IP
- The colours and fonts were clear
- They understood the 'call to action' to contact their service provider

Following the charities testing the collateral on a focus group they suggested –

- The font (12pt Arial)
- Suggested colours
- More inclusive terminology – no Acronyms
- Suggested a free phone number for further info
- Openreach have also engaged with the Communications Consumer Panel, who represent several charities

Learning

Engaging with charities to fully explain the programme has seen positive engagement and learning from different groups on how we have presented our material

The charities involved understood the rationale for the programme and were pragmatic with how they were able to help

5.4 Openreach Test Lab (Digital Services Test Lab)

The test lab has enabled many organisations to test their devices against several CP lines for FTTP and SOGEA

The Digital Services Test Lab was built to provide an environment which emulates some of the conditions found when an analogue line migrates to a digital line. This has enabled vendors of hardware used on the UK telephony network maintained by Openreach, to test their products.

The Test Lab offers a variety of lines for testing including:

- WLR (PSTN and ISDN2)
- FTTP
- SOGEA
- SOGFAST

We had the following CPs install their routers in the lab to enable testing of hardware: Sky, BT, TalkTalk, Vodafone and Zen.

We've had 28 companies visit the lab, including:

Alertacall	London Borough of Haringey	RNIB
Avire	Kone	Stockport homes
BSIA	Link Integrated	Taking Care
BT Redcare	Malthouse Security (Mildenhall	Truecall
Careium	Telecare)	TSA
Chubb	Millbrook	Tunstall
City of Bradford	Pa Consulting	Tynetec
Gartec	Possum	
Globalpayments	Progress Lifeline	

Learning

Since opening the lab, we've had 43 visits, from some 28 different stakeholders and across 7 different industry Segments including Telecare, alarms and Lifts

Testing in the lab confirmed that although using routers' ATA ports to facilitate the use of existing devices in a premises was generally good for voice products (phones, DECT Phones etc) they were a risk when used with machine to machine devices that use DTMF/STMF to transmit, as the tones at times are elongated or shortened and round-trip delay also becomes an issue.

Openreach do not recommend the use of ATA ports for life critical devices (Telecare, Alarms etc) for this reason. There are also several different permutations depending on the devices, its firmware, the software used at the far end and the transmission path over IP platforms.

Section 6 – Communications



6.1 Industry Fora

The All IP programme had coverage at several fora with good attendance

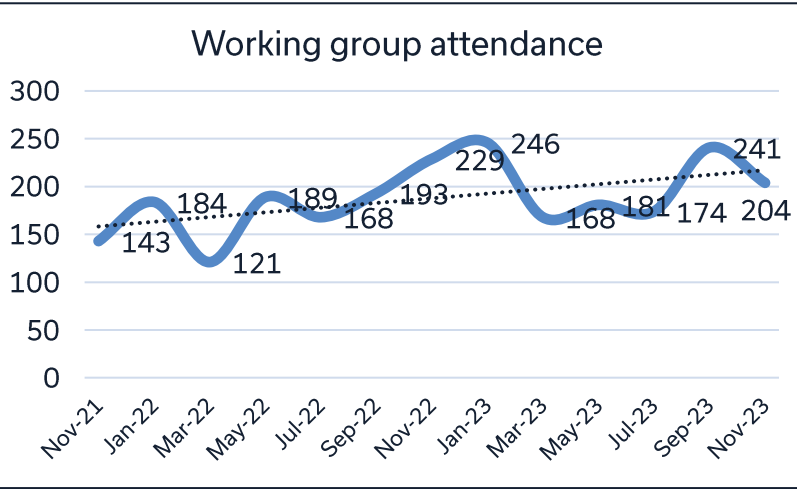
Over the course of the trials, there were 2 key industry groups specific to the programme. As well as these fora, there was a regular slot at the CFPCG, and an occasional slot at the CFPPG and the SMF.

All IP/Exchange Exit Steering Board:

- Monthly Teams call with CPs, which (since June 2022) now alternates between All IP and Exchange Exit content.
- The Steering Board fora provides a platform for Openreach to engage with CPs and request feedback/debate any issues arising from the All IP or Exchange Exit programmes. We also encourage CPs to share their learnings with us on the forum to help us better understand the challenges and opportunities that have been presented.

Transitioning Copper Services to All IP Working Group:

- 2 monthly call hosted over Webex and attended by both CPs and non-CPs which has been running since 2018
- This highly attended forum is an essential means for Openreach to communicate and discuss the latest news and updates covering the WLR withdrawal programme and more latterly the Exchange Exit programme.



All IP Industry Working Group Attendance trend shows steady increase over last 2 years. Peak coinciding with significant milestones including Jan 2023 (service degradation) – 246 attendees. Sept 2023 (WLR UK Stop Sell) – 241 attendees. Declines in attendance noted at end of financial years - (March 2022 and March 2023)

September 2023 event:

- 98% found the event very engaging, content praised as bring informative.
- 21% (mainly non-CPs) found pitch too technical. Pilot for a new Non-CP Working Group (January'24) to cover less technical content.

Learning

Transitioning Copper Services to All IP Working Group

Attendance over time has been increasing, driven by significant milestones along the WLR Withdrawal timeline.

Content is often targeted towards CPs with technical terms used that can be difficult for non-CPs to understand.

All IP/Exchange Exit Steering Board

When first launched, there was a lot of open discussion and feedback on the Steering Board from CPs concerning the All IP Trial locations.

More recently, stimulating discussion amongst CPs has been more challenging as some are reluctant to share their learnings and provide feedback in an open forum.

6.2 Communications to industry

Openreach communications were primarily aimed at CPs and relevant wider organisations

In the early stages of the trials, in 2019 we ran a number of All IP roadshows across the UK, educating CPs on the new WLR Withdrawal programme and the associated Salisbury and Mildenhall trials. Attendance was high, with a broad CP representation. This was an early introduction to the trials for CPs with the opportunity to ask questions and secure relevant contacts.

In May 2023, we held a follow-up event at the BT Tower in London, with representation from mainly the larger CPs and the OTA2. Although attendance was high, we only ran one event as opposed to the series of roadshows in 2019. The event received good feedback and audience engagement was high.

We have published numerous CP briefings to industry, keeping them updated on all aspects of the trials.

Openreach produce an All IP newsletter aimed at both CPs and wider industry. With over 1,500 subscribers, we have an average 33% open rate (17%-28% = Good) and an average 18% click to open rate (11% - 15% = Good).

CP feedback

"Customer comms - Openreach has tried various different comms methods alongside those the CP has deployed. This has demonstrated that a large portion of customers are uninterested in FTTP. This is something we will need to consider going forward."

"We and Openreach also need to be careful to make it clear that there are other copper alternatives still available e.g. MPF. "

"Openreach comms have been regular and clear. There was some confusion within our company that Salisbury was only a WLR closure (and not a total copper closure) and I don't think that this confusion was limited to us."

"Your team are good updating me."

"Mixed and unclear."

"This has been great throughout via all channels - workshops, industry calls, briefings!."

Learning

It is essential to keep CPs abreast of all aspects of the trials. Being upfront and transparent has ensured our CPs are up-to-date with full understanding of all trial-based decisions and any changes. CP briefings allow us to formally communicate to our CPs ahead of formal discussions at various industry fora. The briefings are also a good reference point for CPs throughout the trials. Upon CP request, we now have a 'latest updates' section at the top of the 'Trials' CP Portal page enabling CPs to quickly and easily see the latest updates.

The All IP newsletter is an excellent communications tool, enabling us to summarise the various aspects of the trials and wider product developments all in one publication.

CP face to face events are an invaluable tool to engage in real-time, honest and open conversations, contributing to the success of the trials

6.3 Openreach Portal

The Openreach portal was developed and grew in detail

Two pages were initially set up on the CP Portal to provide guidance and Documentation about the All IP and WLR Withdrawal programme:

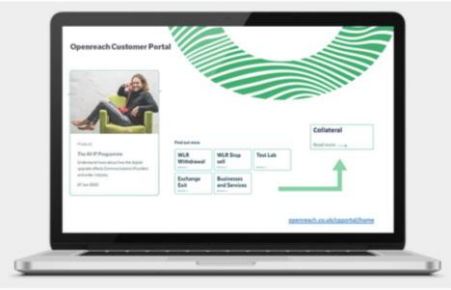
- WLR Stop Sell
- WLR Withdrawal

Feedback from our CPs highlighted there was too much content bundled onto the WLR Withdrawal page making it difficult to navigate and locate essential information. The Stop Sell content was also highlighted as being complex and difficult to understand with queries raised over the accuracy of some of the rules.

WLR Withdrawal content aimed at end customers was likewise identified within Openreach.com, which was not up-to-date and difficult for Non-CPs to locate.

This led to the development and creation of new portal pages with end customer content moved from Openreach.com to the CP Portal. All our content now sits in one place under the All IP Programme – accessible to both CPs and the public (with some aspects behind the login). To aid navigation to this content, we have a 'splash' on the home page of the portal, directing visitors to the All IP Pages.

- Collateral
- Businesses and Services
- All IP trials
- Digital Services test lab
- Stop Sell
- WLR Withdrawal



Customer portal feedback:

"Plenty of content shared on the portal now"

"Very useful, has all the information you need."

"Finding past comms and trial specific information within the portal can be difficult and time consuming. However, storing all the information relating to Salisbury & Mildenhall within the All-IP programme portal has helped make this quicker."

"The new streamlined pages are easier to follow. At one stage there was too much information available, and it was difficult to find things easily."

"We also spent time with our account team reviewing the policy documents and content to ensure it accurately reflected the current situation regarding MPF."

Learning

The portal is a key resource where CPs and other interested parties can go and find documents and information to help them understand the programme and specific content.

Learning has included the challenge in making complex information simple. The stop sell pages were the most detailed and complicated pages. The feedback on the updates made have been positive. We would like to invite CPs to continue giving feedback on how to make the pages as easy to understand as possible. Thank you to those CPs who have been engaged in this so far.

Using the portal for non CPs is also useful as it allows other organisation websites to point to the site for up to date information about the programme, including specific information about what Openreach are doing.

Section 7: End customer engagement



7.1 Postcards

4 sets of postcards were sent to end customers over the trials period

Openreach set out in the trial with the thinking that CPs should be owning the relationship with the end customer, and this had been agreed by CPs at industry conversations.

However, as the trials continued, it became clear that not all CPs were engaging with Openreach, sharing plans, or migrating quick enough and therefore there was a concern that some end customers may be left behind with no awareness of the potential consequence of losing service at the end.

Therefore, Openreach made the decision to use end customer postcards to get key messages across to sections of end customers. There were some concerns as to whether end customers would be aware of whom Openreach was and whether they would read the postcard or think it was a piece of marketing.

Openreach shared policies on how the postcards would be agreed and sent, and key that only “in-scope”, non-exempt customers would receive postcards.

Date	Cohort	Trigger	Message
July 2022	End customers of non-engaged CPs	CPs who had not shared a forecast	We haven’t heard from your CP, please speak to them to migrate
January 2023	End customers of materially off-track CPs	Migrations compared to forecast	You’re not on track to migrate, speak to your CP
March 2023	WLR+FTTC end customers	All end customers	Speak to your CP before your broadband speed is reduced end April
April 2023	All non-WLR+FTTC end customers	All end customers	Speak to your CP before your voice calls stop connected beginning of June

Learning

Difficult to be sure whether postcards drove any extra migrations, due to other activities happening

End customer postcards were welcomed by most CPs, with these giving an extra message to end customers about the need to migrate

Openreach is currently not planning to continue with sending out end customer messaging for the UK-wide WLR withdrawal programme.

Postcards from Openreach had set messages which were not tailored to specific CPs who sometimes had their own different messages. For example, some CPs chose to communicate their own dates for terminating service which was at odds to Openreach postcards, causing some confusion

7.1 Postcards - continued

End customer postcard – sent to in scope end customers of non-engaged CPs

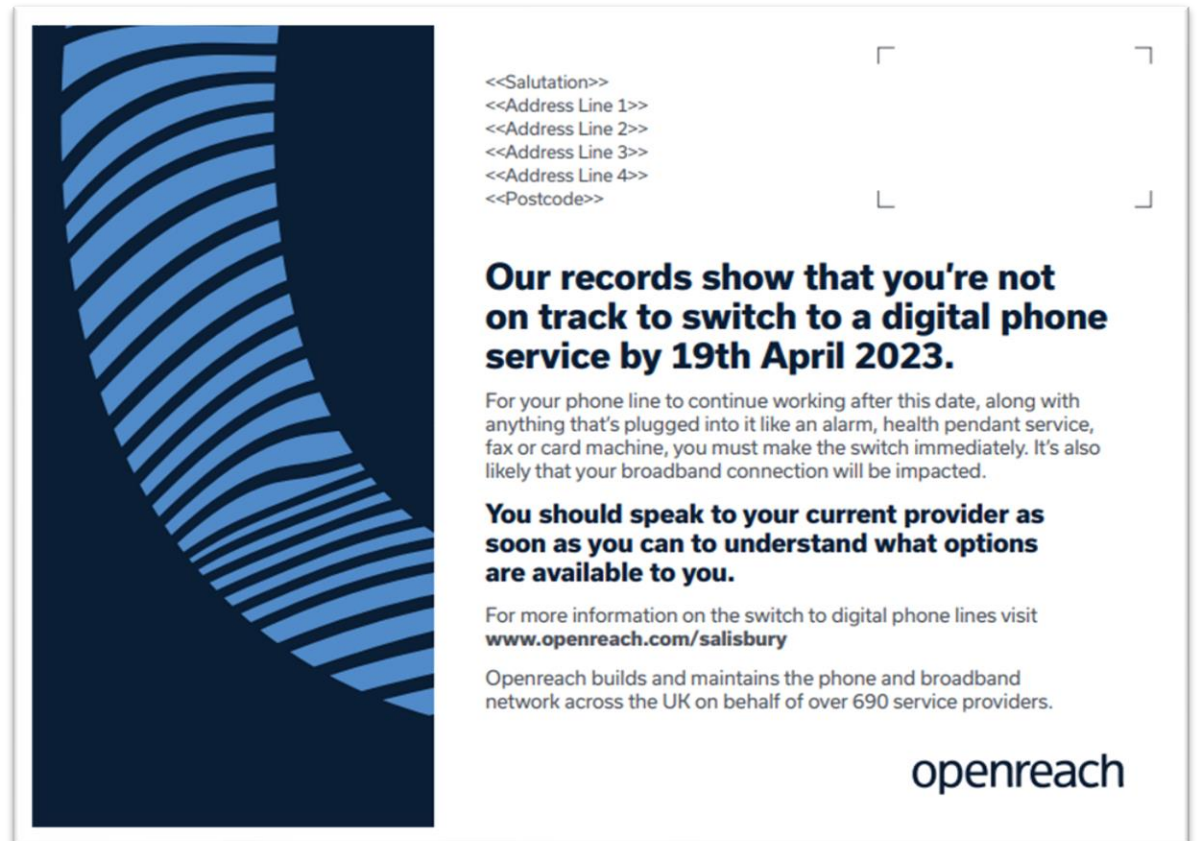
Sent July 2022



7.1 Postcards - continued

End customer postcard – sent to in scope end customers of off track CPs

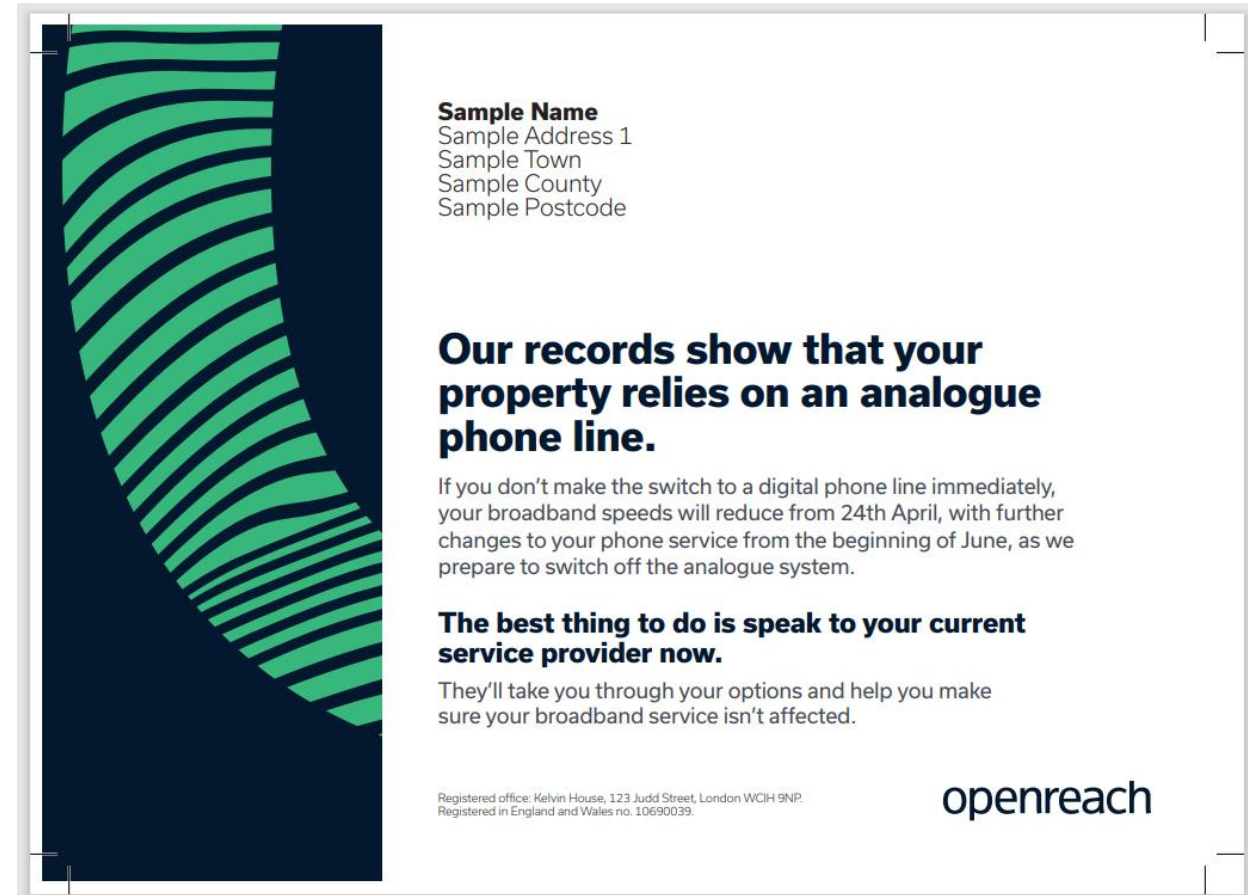
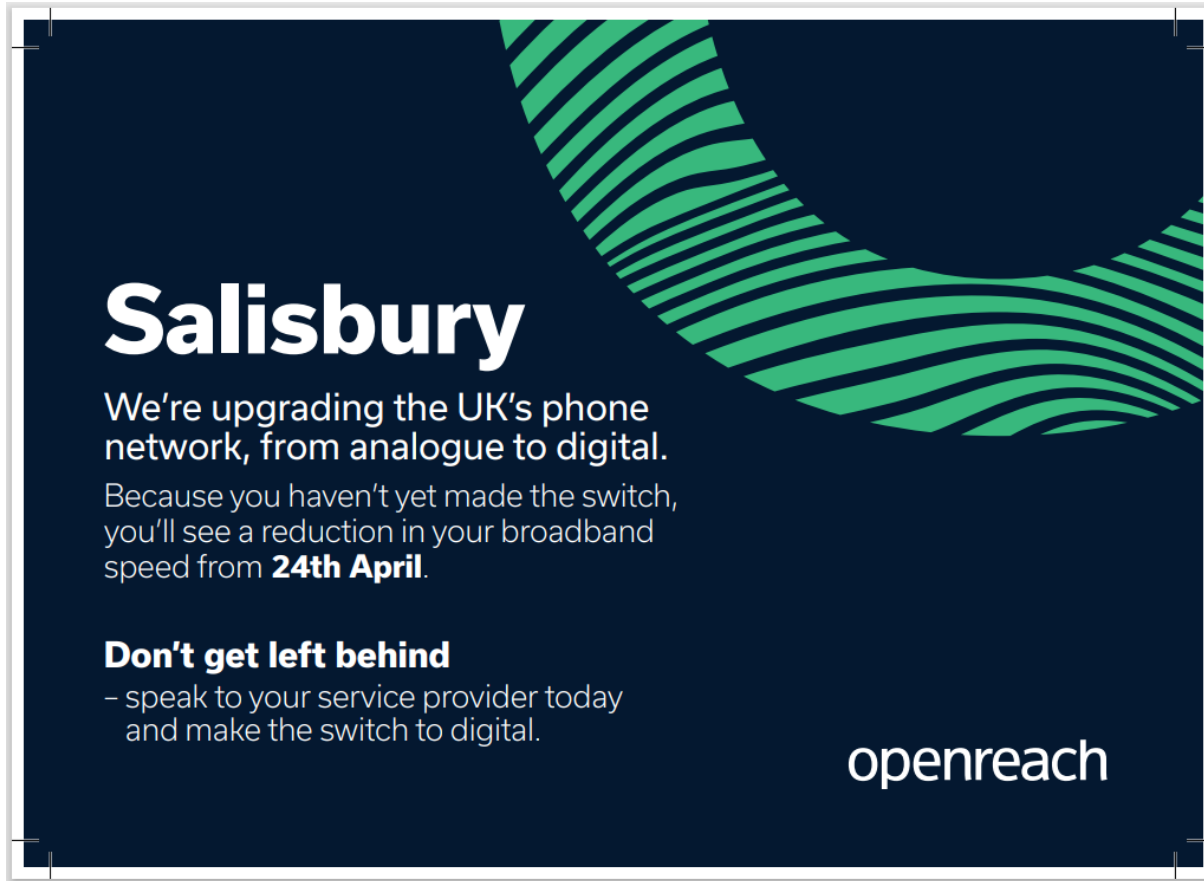
Sent January 2023



7.1 Postcards - continued

End customer postcard – sent to in scope WLR & FTTC customers

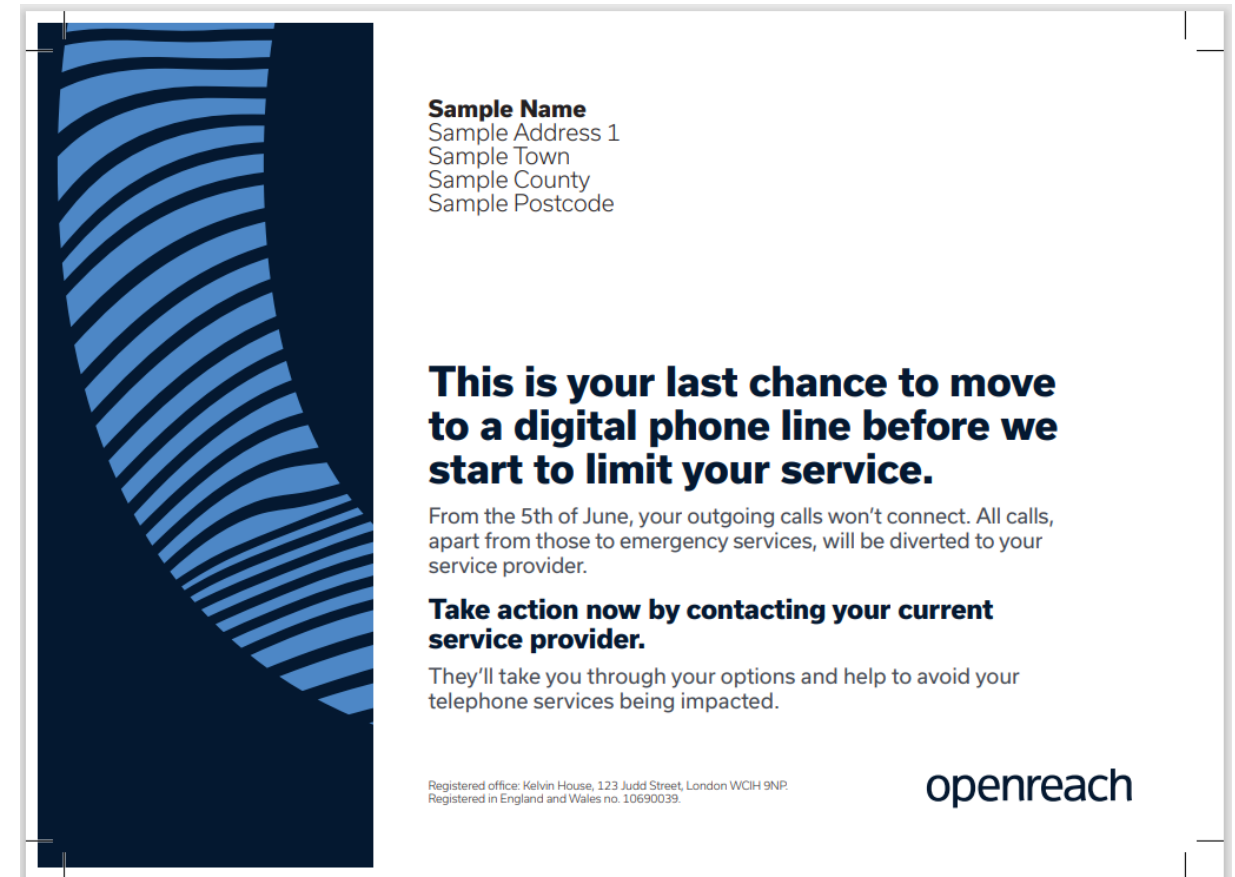
Sent March 2023



7.1 Postcards - continued

End customer postcard – sent to in scope WLR customers

Sent April 2023



7.2 Mildenhall campaign

Openreach end customer awareness campaign to gain learning

Openreach set up a 6-week, one off Openreach campaign, aiming to raise public awareness and share learnings with CPs.

This was carried out between 21 February to 18 April 2022. The Intention for this to be a one-off activity, to test methods and share with CPs.

Activities to drive engagement

- Social media paid ad campaign
- Blanket postcard door drop (4k over 3 days)
- Coverage on Suffolk live – online news site

Call to action

- Coffee cart on market day
- 0800 number with recorded message
- Openreach portal webpage
- Speak to CP

We received 90 calls into the 0800 number - 60 from landline, 20 mobile, 10 VoIP. The main driver was the blanket postcard. The trials webpage had 1.8k views (850 unique), driven by social media posts. There were 30 one to one conversations at coffee cart, majority were positive. Social media ads reached 4.1k, most interactions were with the 65+ age range. Main questions from general public at coffee cart included:

- When
- Why
- What happens in a power cut

883 people registered an interest in updates via the Openreach portal from one of the communications above.

Learning

Proactive engagement results in a more positive response

Digital ads performed best in engaging with the public

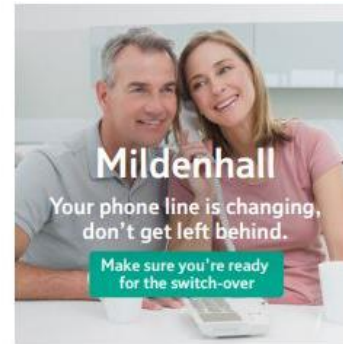
People wanted reassurance around vulnerable, loss of power, and mobile coverage

CPs have said there was no noticeable increased call traffic during and following the campaign

Awareness of digital upgrade in the East of England has increased from end 2021 – 15% to 44% in April 2022 (Openreach paid market research via public face-to-face questionnaire)

Mildenhall public awareness campaign

21 February 2022 – 18 April 2022



Call to action

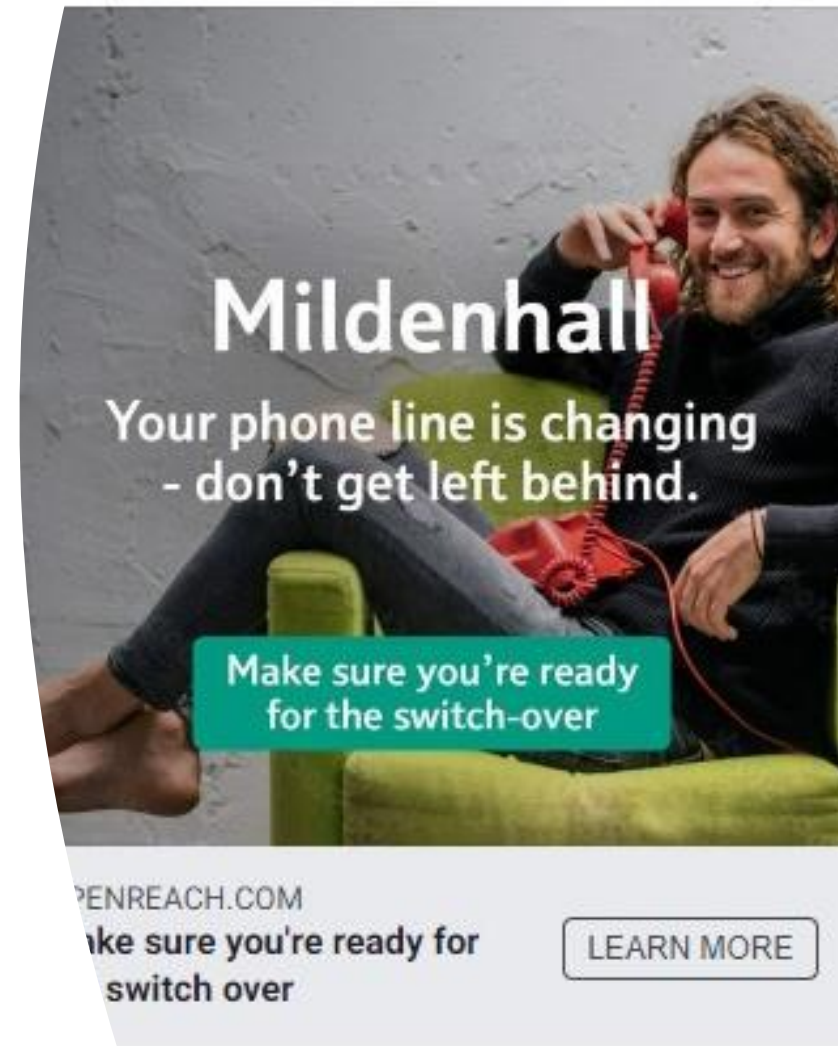
- Openreach 0800 phone line
- Openreach.co.uk/Mildenhall
- Contact your service provider

Campaign Activity

- Posters
- Coffee Cart – Mildenhall Market
- Postcard door drop (4k over 5 days)
- Local media – advisory content
- Social media paid ads Facebook and Insta

Openreach
Sponsored

our alarm, fax machine, or health pendant
connected to your phone line? In Mildenhall,
from April 2023, it may no longer ...see more



Section 8: End of trials



8.1 Service degradation

Measures were introduced to prompt end customer engagement with CPs

Monitoring the volume and run rates throughout the trial, gave Openreach the opportunity to assess the likely volume of end customers still on WLR by the 19 April 2023 contract termination date. Feedback from CPs was that end customers were not engaging with messaging; therefore, the aim of the measures was to prompt end customers to have conversations with their CP.

In December 2022, a review showed there would be a large number considered for ceasing. After discussing options with key stakeholders, Openreach communicated (in January 2023) a set of service degradation measures to be applied from 19 April 2023, whilst the end of the trial would move to October 2023 at the earliest.

The measures would be applied to non-exempt lines and were chosen based on what was achievable in a tactical approach and likely to have the greatest impact.

- Two ways of prompting end customers were chosen:
- 1 – reducing broadband speed where the WLR has FTTC
 - 2 – diverting outgoing calls to the CP for further conversations

	End Apr	May	Jun	Jul	Aug	Sept	Oct
FTTC speed reduction	Batch 1	Batch 2 Batch 3					
Route to credit control			Batch 1 Batch 2	Batch 3			
Cessation of service						Review	All remaining

CP feedback:

"It worked in a small number of cases. For many the BB speed reduction did have a major impact."

"Clear and concise communications."

"No effect on our customers."

"Clear and concise communications."

"Did help to move some customers."

"This was a welcome intervention and was well executed by Openreach."

"I had no issues with these service degradation, but this did not seem to drive the amount of customer interaction as one would expect."

"Not enacted - as far as I am aware- with any clients"

"worked well and delivered its purpose."

"FTTC speed reduction had a greater impact than the RTCC did, however the decision made by Openreach to 'pro-actively exempt' circuits without consulting the CPs, resulted in a very small sample size to measure the true impact. If Openreach were to implement these degradation measures again for any of the future network or exchange closures, we would suggest applying them to all eligible circuits."

8.1 Service degradation - continued

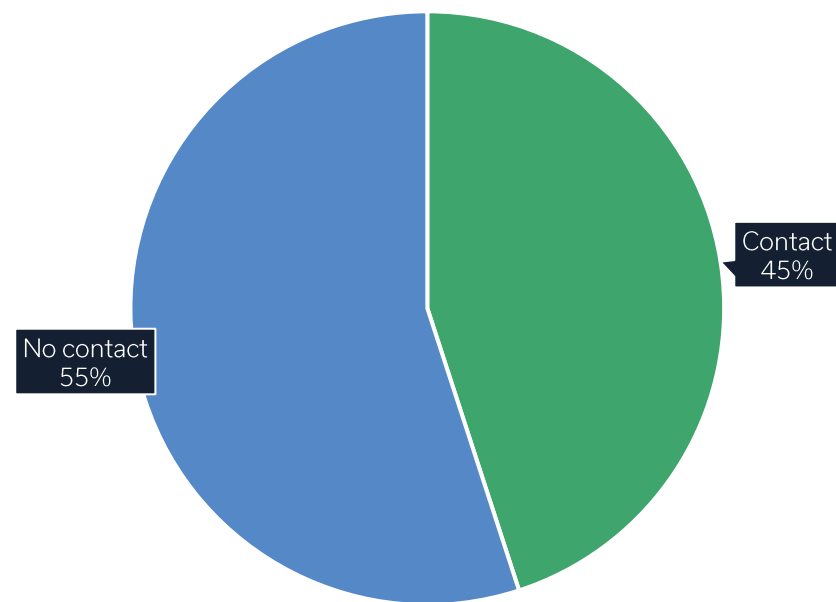
FTTC speeds were reduced, giving a 45% rate of customers reacting

In April, FTTC (where over WLR) speeds were reduced to 2Mbps down and 0.8Mbps up, and billing suspended. This was the slowest profile Openreach could use. The process was that CPs could have the previous speeds reinstated following an All IP order, or an agreed exemption where they filled out a form requesting so.

Speeds were reduced in 3 separate batches of lines so we could test initially on a small batch to check the process could work, also to protect service in case there was an increase in the engineer install visits required. The process to reduce the speeds was manual, and although successful, CPs did occasionally circumnavigate the speed reduction – increasing the speeds without following the process or discussing migrations with the end customer.

Faults were raised on the lines, sometime repeats. This caused issues with field resources, and after working with CPs to reduce and ask them to cancel the faults we changed our process to revert the speed when a fault was raised. Whilst this may have stopped the end customer exploring migrations with the CP, it did allow us to monitor the level of activity we saw which was driven by an end customer.

Following the introduction of FTTC speed degradation measures, 45% of assets were ceased, migrated, raised a fault or were marked as exempt by the CP



Where speeds were still reduced, they were increased back to previous speeds on 31 October 2023, and billing recommenced in line with the communications regarding cessation (slide 58).

Learning

FTTC speed reduction was more effective at driving engagement than route to credit control.

Download speeds of 2Mbps still allowed users to access the internet and may not have been noticeable by some.

Being geographically small trials areas, some CPs could not change processes or brief all agents specifically. Given the speed reduction was manual, there was no way for agents to understand why speeds were low. Therefore we encountered faults raised, and migration opportunities missed. This may be preventable if CPs apply their own measures and can add notes to accounts.

Faults (especially repeat faults) were very challenging to manage from the perspective of engineers and they were advising the end customer to speak to the CP agents, whom in the majority did not know about the service degradation measures.

8.1 Service degradation - continued

Outgoing calls were diverted to CPs, giving a 9% rate of customers reacting

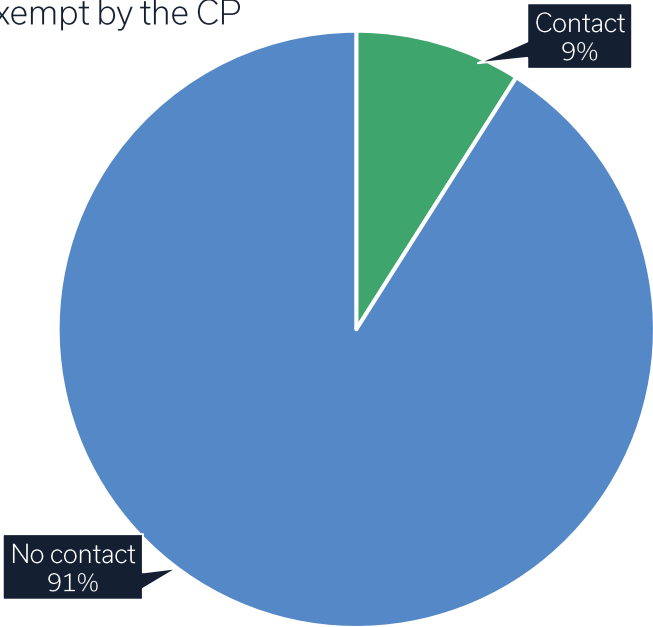
After speed was reduced, a further measure (route to credit control) was also implemented onto all non-exempt trial lines, which was designed to divert calls made by end customers to their CP in order to discuss the migration required. Fees for applying this service were waived.

This was also carried out in 3 batches. With FTTC+SMPF lines being first, WLR solus second, and then WLR+FTTC and any ISDN2 lines being in the 3rd batch.

The requests to remove measures due to an All IP order or agreed exemption was underutilised with only a handful of requests during the whole degradation period.

Before all service degradation was implemented, Openreach made CPs aware and continued to allow exemptions to be open – any exempted lines would not have service degradation applied. Due diligence was also carried out by working with key stakeholders to proactively exempt end customers who had telecare devices or had addresses which appeared to be linked to any kind of medical or emergency service.

Following the introduction of Route To Credit Control (RTCC) measures, only 9% of assets were ceased, migrated, raised a fault or were marked as exempt by the CP



Where RTCC was still active, it was removed on 31 October 2023, in line with the communications regarding cessation (slide 58).

Learning

Route to credit control itself did not generate a good level of end customer reaction or level of migrations.

Majority of CPs did not divert the calls to an agent, but to a message which informed the end customer of varying messages. Some retained their message about there being an issue with billing, and some amended to be trials specific.

Due diligence was necessary and was taken when using this method, in the case that a telecare device was known about or the address appeared to show a potential medical or emergency service.

8.2 Cessations October 2023

Openreach cessations were successful with no issues raised to date

In September 2023, Openreach wrote to trials CPs to confirm that WLR lines that did not have any voice or broadband usage in the previous 6 month period would be ceased on 31 October 2023. Openreach wrote to both the WLR and FTTC CP for the lines impacted (where this was different).

This was communicated at various fora including the CFPCG (see slide 59 for slides that were used).

Openreach used a manual process to cease the lines, having to first migrate the lines to a proxy CP (using a like for like transfer order), and then raising the cease order on the same day to terminate the WLR service. Where a line had FTTC, the managed cease order for the broadband was raised automatically on the back of the WLR cease KCI3

A number of transfer orders were rejected due to CP raised open cease orders - this was expected behaviour. Other transfers encountered issues due to various reasons of manually processing – learning has been taken as to how to mitigate this in the future.

Approx 10% of the transfer orders were cancelled by the CP. Upon highlighting to CPs they tried to reduce these instances, but again, given this was a trial amongst many other orders, it was difficult to completely stop this behaviour.

There remain a small number of cessations which failed several times and have now been paused due to the amount of manual effort. The intention is that these will be revisited in the future.

Learning

Very manual efforts on Openreach side for ceasing the lines, with failures found. Openreach are now developing a more elegant solution for future cessations.

As part of consumer protection process, the losing WLR CP receives a notification. Some CPs used this and raised "cancel other" orders, which meant the transfer order did not go through. Impact to be understood for cessations the introduction of One Touch Switch which removes some of this functionality.

There have been no incidents or escalations raised by CPs or end customers in regard to the cessations to date.

Most CPs did not manage their own customer base by ceasing service, and relied on Openreach to carry out this function. Early feedback from CPs is that where they have sent out end of contract notices, there has been a 30% take-up on migrating to All IP.

8.2 Cessations October 2023 - continued

Slides shared at September 2023 CFPCG outlining cessations

Current view on where we started versus where we are now

We have seen migrations, ceases or exemptions on 95% of the lines in the trial areas, with 5% remaining

89% of the original WLR base has migrated, and a further 6% have had exemptions granted

We have 5% of lines still on WLR, and are taking action to close the trial

Status	Percentage
No longer on WLR	89%
Exemption granted	6%
WLR still active	5%

We have worked across both areas to test, learn and encourage migrations:

- All end customers in scope of cessation will have received at least 1 postcard from Openreach detailing the changes and what they need to do
- We worked closely with Wiltshire Council
- OFCOM wrote to CPs who weren't engaged with us
- We have had assets under speed reduction for broadband and RTCC for voice.
- We opened an exemptions process so that CPs could highlight individual customers who should be protected for any measures

We have checked for incoming and outgoing call usage, Openreach data to review whether we saw the router powered on (since 1 April 2023). We will only cease voice if we see no activity

We expect further reductions before end October 2023

How we intend to deal with the WLR lines in Salisbury and Mildenhall

We have a plan to end the trial with action, and guidance on what will happen with all the lines that remain

6%	5%	
Assets where an exemption has been granted	Assets where no exemption has been granted. We can see voice and / or broadband usage	Assets where no exemption has been granted. We can see no voice or broadband usage
<ul style="list-style-type: none"> • Remain exempted 	<ul style="list-style-type: none"> • Remain active • Remove service degradation measures • Recommence FTTC rental charges 	<ul style="list-style-type: none"> • Cease assets on 31 October 2023 • (Openreach needs to migrate the asset to a dummy account)
	All lines in this cohort are currently subject to Route to Credit Control, and FTTC speed degradations (2Mbps downstream where applicable)	

Section 9: Recommendations & Next Steps



9.1 Recommendations and next steps

Theme	PIR learning	Recommendation	Next Steps
General	The trial was very important in steps for industry to move from copper to All IP.	Discuss learnings across industry and share best practice	<ul style="list-style-type: none"> Share PIR and next steps with industry and offer bi lats to Communication Providers (CPs)
CP engagement	42% of CPs were not engaged until the second forecast was requested in October 2022, meaning that Openreach leant in beyond initial intentions to ensure end customers were kept informed	<ul style="list-style-type: none"> Build plan for engaging all WLR CPs Agree measurement of "engaged" Ask Ofcom and DSIT to prompt "non engaged" CPs Encourage activity from CPs to end customers 	<ul style="list-style-type: none"> Build Migration Manager strategy for reaching CPs Complete internal "risk profile" for CP base Continue working with Ofcom and DSIT re CP engagement Support CPs to reach out to end customers – e.g. white label collateral, sharing best practice Review OTA Best practice guide
Cohort learning	<ul style="list-style-type: none"> Limited learning on vulnerable and CNI, since these were exempted, although c.25% of exempt lines did subsequently migrate to IP services Question from CP regarding Prove Telecare timings, and whether enough time is available to migrate telecare customers before WLR withdrawal Question from CP regarding CNI processes. Suggestion to use the learning with Exchange Exit pilots. Question from CP regarding process for complex migrations 	<ul style="list-style-type: none"> Vulnerable learning through Prove Telecare product trials, and engaging with CPs Understand CPs' consumption plans and vulnerable journeys CNI and complex require more industry thinking on what and how, suggest using Exchange Exit pilots for more learning, to include WLR sites 	<ul style="list-style-type: none"> Work with CPs on vulnerable plans. Share information through CFPCG, working with Ofcom and DSIT guidance, as well as deadlines for Prove Telecare, and other ways to keep vulnerable customers safe Work through definition of "CNI" and "complex" Build plan for CNI and complex premises Review a landlord report product Plan to include Identification of cohorts CPs to share information about volumes of cohorts, and possible solutions, where not via standard products
Ease of migration	Proportionally, WLR reduction success was similar in Salisbury and Mildenhall, and similar when the All IP alternative was FTTP vs SOGEA	<ul style="list-style-type: none"> Continue to roll out additional features on FTTP and SOGEA 	<ul style="list-style-type: none"> Continue to review product capabilities and encourage CPs to flag product gaps Regular reviews of CP consumption of products
Communications to CPs	Signalling service measures had a significant effect on the migration run rate, more so than the activity itself	<ul style="list-style-type: none"> Set out future activity and plans as early as possible 	<ul style="list-style-type: none"> Core principle of programme to include understanding the needs of the CP to have time to understand future plans where possible and practical.

9.1 Recommendations and next steps - continued

Theme	PIR learning	Recommendation	Next Steps
Non responding end customers	<ul style="list-style-type: none"> Service measures on broadband were relatively successful, prompting 45% of previously non-responding end customers to react. Voice measures were not impactful, with only a 9% response rate. There was limited evidence of CPs trying innovative ways of engaging with end customers to migrate A base of 4% of non-responding end customers remained on WLR in October 2023 - further work is needed on how to resolve this across industry. Question from CP regarding how we communicate best across industry re communications strategy 	<ul style="list-style-type: none"> Encourage CPs to implement their own service measures Work with CPs and external organisations including FCS, Fit to Switch, Tech UK, Ofcom to agree strategy for engaging across the UK without causing panic Review with industry communications strategy 	<ul style="list-style-type: none"> Understand CPs' plans Following work on Network Operator charter, engage across industry on end customer engagement Use steering board to consider industry communications strategy
Date changes	Feedback from CPs was mixed. Whilst many understood the reason for doing so, feedback included that it dented the confidence in the programme	<ul style="list-style-type: none"> Any changes in date are fully explained and consequences understood 	<ul style="list-style-type: none"> Core principle of programme to include giving good explanation for any changes whilst gathering impacts on CPs
Split CPs	Feedback from CP that more work here is needed to inform migrations and communications when end customer has WLR with one CP and broadband with another	<ul style="list-style-type: none"> Understand how split CPs can be better supported, especially when there is a Wholesaler and Reseller relationship 	<ul style="list-style-type: none"> Set up working group to review issues and solutions for split CPs
Moving customers off the WLR network	Non-used lines were ceased in November 2023 with no issues raised	<ul style="list-style-type: none"> Work with Ofcom and DSIT on how to safely move end customers off the network when required 	<ul style="list-style-type: none"> To review post DSIT charters in place Continue to discuss with Ofcom