BT Compliance Committee Bulletin 18 | July 2022 Meeting

About us

The BT Compliance Committee (BTCC) is a BT Group plc Board Committee, responsible for monitoring and reporting on BT's compliance with the Commitments and Governance Protocol. This is our 18th Bulletin reporting on our July 2022 meeting.

The BTCC is supported by the Commitments Assurance Office (CAO). Further information about the BTCC and CAO can be found [here](#).

Key Topics

• The Committee was pleased to hear from Ahmed Essam, CEO Vodafone UK, joined by Vodafone's Communications, Sustainability and Regulatory Affairs Director. They offered their reflections on how the Commitments are working for them and their relationship with Openreach.

• The Committee received updates from BT's CAO Director on ongoing monitoring of core processes intended to support the Commitments (financial planning, commercial processes and strategy) and major projects, such as Equinox 2 and the Simpler Networks program. No significant issues of concern were identified.

The Regulatory Affairs Director and BT's Communications Regulation Compliance team provided updates on several Commitments activities, including a refreshed Commitments training plan and progress in relation to the Commitments enhancement plan.

• The Committee heard about a review BT and Openreach have been conducting into the processes for BT approval as parent of Openreach commercial decisions (as set out in Guidance Note 7 (GN7)). The proposal is to introduce updated internal guidance to clarify how GN7 should be interpreted in some edge cases.

•The CAO Director and Regulatory Affairs Director presented their assessment of whether there were material developments that might require changes to the Commitments now or in the immediate future. The Commitments have been in place for 5 years and the view shared with the Committee is that they generally continue to work well and as intended; a recommendation was made to carry out further work to improve understanding of the impact of changes in technology on systems separation requirements.

Commitments Cases

The Committee considered the following cases:

Case CAO-43: ServiceNow

• In January 2022, Networks launched the first module of ServiceNow, a new Operational Support System (OSS), used by Openreach and BT to support change, incident and problem management.

• Under Commitment 13.2, ServiceNow should have been launched as a level 2 separated OSS or BT should have added ServiceNow to the exemption list of shared OSS before launch (Annex C of the Commitments). The first module of ServiceNow was launched as a shared OSS without level 2 separation or exemption. Whilst there was no evidence of harm (lack of CI/ CCI within the system) or malintent BT recommended this case should be a serious breach of section 13.2 of the Commitments.

The Committee agreed with the recommendation and decided Case CAO-43 is a serious breach of section 13.2 of the Commitments and should remain open pending completion of remedial actions.

Case CAO-44: Enterprise contact with Openreach

• In May 2022, an Enterprise Network Engineer contacted an Openreach FTTP Order Management agent to escalate a customer's order progression, having obtained the agent's details from the internal corporate directory. Remedial action was taken to speak to the relevant individual and their manager and to reiterate the importance of using correct contact channels.

The Committee decided Case CAO-44 was a trivial non-conformance with process and could be closed.

<u>Our next meeting</u>

The BTCC's next meeting will be on 31st October 2022