

A10. Proposed guidance on C7.28 regarding multi-factor authentication

- A10.1 This Annex contains Ofcom’s proposed guidance on General Condition C7.28¹ relating to Auto-Switch, as noted in section 7.
- A10.2 The purpose of this guidance is to explain how providers can comply with the requirement to provide a PAC, STAC and/or Mobile Switching Information to residential switching customers within one minute, where providers are using multi-factor authentication.
- A10.3 We propose that this guidance will come into force as soon as is practicable after the publication of our statement. We will confirm the specific date in that document.

Guidance on Condition C7.28 – How and when the PAC, STAC and/or Mobile Switching Information must be provided to residential tariff customers

- A10.4 This guidance does not form part of the General Conditions and is not binding on Ofcom. While we will take it into account, we will determine compliance with Condition C7.28 on the basis of the individual circumstances of any given case. However, where we decide to depart from the guidance, we expect to give reasons for doing so.
- A10.5 Words and expressions used in Condition C7.28 have the same meaning when used in this guidance.

Authenticating residential switching customers requesting a PAC, STAC and/or Mobile Switching Information

- A10.6 GC C7.28 states that “Regulated Providers must ensure that when they provide the PAC or N-PAC and/or (as applicable) the Switching Information in accordance with Condition C7.26 (a) and (b) to a Mobile Switching Customer, they do so no later than one minute from receipt of the request.”
- A10.7 Providers must allow customers to request a PAC or STAC and/or Mobile Switching Information via at least three different methods – SMS, phone and their online account.² Before providing the PAC or STAC and/or Switching Information, providers will need to authenticate their customers. It is for providers to determine how best to satisfy the requirements of data protection regulations in authenticating their customers.

¹ Ofcom, [General Conditions of Entitlement Unofficial Consolidated Version with effect from 17 December 2021](#). The GC numbering in Condition C7 is subject to change as a result of our September 2021 consultation. If our proposed changes to GC C7 are implemented, GC C7.28 will become C7.36 and the GC numbering in this guidance will be updated accordingly.

² Condition C7.23, Ofcom, [General Conditions of Entitlement Unofficial Consolidated Version with effect from 17 December 2021](#). See footnote 1 above for further information on forthcoming changes to GC numbering.

- A10.8 It therefore remains open to them to design their processes to include additional authentication of customers requesting a PAC or STAC and/or Mobile Switching Information, for example using multi-factor authentication. Multi-factor authentication involves the customer needing to provide more than one credential to prove their identity to the provider.
- A10.9 Because multi-factor authentication usually relies on the customer inputting information, the time it takes to complete is in part dependent on the time the customer takes to supply the information.
- A10.10 Below, we set out guidance on the information providers should request from customers, and the circumstances in which they are permitted to 'stop the clock', when using multi-factor authentication.

Information providers should use to authenticate customers' identities

- A10.11 As noted in our October 2018 letter to industry,³ when using multi-factor authentication to authenticate a customer's identity, providers should ask customers to provide information that they are likely to be familiar with, is easily memorable, or is readily accessible to the customer. For example, this could be their date of birth or postcode.
- A10.12 We do not consider that a customer's account number, password, or their last amount billed meets these requirements, and providers should not request this information, or anything else which a customer is likely to be unfamiliar with or struggle to remember, when seeking to authenticate a customer's identity. Doing so may necessitate the customer engaging further with their provider to locate it, leading to hassle and potentially delaying the switching process.

Stopping the clock when requesting information from the customer

- A10.13 Where providers use multi-factor authentication to authenticate a customer's identity when they have requested the PAC or STAC and/or Mobile Switching Information, it is acceptable for them to 'stop the clock' between the customer receiving the request for the additional credential, and the customer providing it.
- A10.14 This means that where a provider is using multi-factor authentication to verify a customer's identity when they have requested the PAC or STAC and/or Mobile Switching Information, the required information should be delivered within one minute of the provider receiving the request, excluding the time that the customer takes to provide the additional credential.
- A10.15 For the avoidance of doubt, it is not acceptable for the PAC or STAC and/or Mobile Switching Information to be provided to the customer more than one minute after the customer had made the request simply because the provider is using a multi-factor authentication process.

³ See Ofcom, [Letter to industry on SMS authentication](#), October 2018.