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# Requirements for Third Party Verification

## Version Control

Version	Status	Update	Effective Date
1.1		Draft for Industry review	11 <sup>th</sup> December 2012
V2.0	Final	This document is based on V1.1 Implementation of Standardised Change Control.	16/06/2017

This document follows change control procedure:

**Proposed** is defined as a document status when the approved document is uploaded to Proposals Section of open air Website.

**Final** is defined as a document status when the approved document is uploaded to the relevant section of the open air Website following the publication period.

**For information:**

- Historical Document History Table located at end of Document.
- Publish means the action of uploading a document to the website regardless of status or location.
- **If there are changes to the document between 'Proposed' and 'Final', change control operates.**



# 1 Introduction

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## 1.1 Overview

The purpose of this document is to outline the generic information required for Third Party Verification (TPV) for obtaining customer consent to approve a change of service.

The Product Service Schedules govern the rules pertaining to CAFs and determines which format of CAF is allowed for each product.

Section 8 of this document outlines the generic information required for all forms of TPVs. This document details the procedures to be followed for the application of TPV.

## 1.2 Definitions

All relevant terms and abbreviation for the Products are defined and explained in the following documents which are published by eircom on its website [www.openeir.ie](http://www.openeir.ie):

- The respective Reference Offer
  - o Access Reference Offer (ARO)
  - o Reference Interconnect Offer (RIO)
  - o Wholesale Bitstream Access Reference Offer (WBARO)
- Migrations Product Contract
- The respective Product Descriptions
- The respective Process Manuals

For purposes of this document, all references to the Access Seeker shall also be considered to include the Operator.

## 1.3 Adherence to Data Protection Legislation

Service Providers should ensure that they are aware of and in compliance with legal requirements under relevant data protection legislation.

## 1.4 Objectives

This document sets out clear rules and procedures that Access Seekers intending to use TPV in the Republic of Ireland must follow.

The aim of this document is to:

- Ensure robust, quality standards that protect the process.
  - Outline the quality assurance process that will ensure these standards are met.
  - Afford customers at least similar levels of protection from slamming and other fraudulent behaviour as has been provided by the existing process
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## 2 TPV Process

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### 2.1 Brief description of the TPV process

Once the customer has agreed to purchase the one the Products, the customer is connected to an independent third party. The customer is then taken through a verification script with a live TPV agent. This process is recorded and subsequently verified by the third party as a valid order. After an order receipt is sent to the customer, the order is submitted to the Access Provider as per the current process. In the event of a dispute, a TPV CAF and a voice recording will be supplied to the Losing Operator.

## 3 TPV supplier selection

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The TPV supplier:

- (a) Must be independent, reputable and capable of adequately performing a quality live agent verification system.
- (b) Should not be owned, managed, or controlled by the Access Seeker.
- (c) Cannot be given any financial or non-financial incentives to verify orders - since they must remain unbiased and independent, payment must be made irrespective of whether orders are verified or rejected.
- (d) Must operate in a location physically separate from the Access Seeker.
- (e) Cannot also be employed by the Access Seeker to directly sell or market relevant products or services.
- (f) Cannot sell or market relevant products or services within any other business they are conducting for the Access Seeker.
- (g) Can be located anywhere in the world as long as they conform to data protection rules which give an equivalent level of protection to that afforded in the EU and provide the service in English.
- (h) Must sign a contract with the Access Seeker that includes the fact that they will provide TPV services.
- (i) Prior to starting TPV:

The Access Seeker must supply to the National Regulator the name of the company or companies they are using to supply TPV services. This information will remain confidential to the National Regulator. However, the National Regulator will maintain and make available a general register of companies able to supply TPV services.



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All other Access Seekers and the Access Network Provider need to be made aware of an Access Seeker's decision to start TPV.

## 4 Adherence to Data Protection Legislation

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Access Seekers should ensure that they are aware of and in compliance with legal requirements under relevant data protection legislation.

## 5 Methods of TPV

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TPV may only be used in conjunction with a live TPV agent, automatic systems and IVR are not permitted. The procedure is as follows:-

- The customer is transferred to, calls or is called back by a live agent employed by the TPV supplier.
- The TPV agent takes the customer through a script, which includes all the mandatory areas. This is recorded and subsequently verified by the TPV supplier.  
The live agent is subject to the same rules as the TPV supplier.
- Sales agents or employees of the Access Seeker are not permitted to guide the customer through a live verification script.

## 6 Role of the Access Seeker's sales agent

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The sales agent of the Access Seeker can initiate the call to the live TPV agent but must drop off the call once the connection has been established in order to prevent the sales agent pressurising or improperly influencing customers.

It is acceptable for the sales agent to enter the telephone number and account number for the customer prior to dropping off the call.

.....If the sales agent is party to the remainder of the call in anyway, the individual order should be rejected.....



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## 7 Role of the TPV Supplier

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- The TPV supplier is responsible for managing and recording the live agent transaction and also, for verifying the order. They must then code the order verified, pending or rejected.
- The TPV live agent is only allowed to respond to specific questions about the verification process from the customer or to highlight the next step for the customer if confusion is evident.
- The actions that constitute grounds for order rejection on behalf of the TPV agent are listed in section 12.

## 8 Mandatory elements of the script

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The following are mandatory elements of the verification script. Whilst the exact wording is up to the individual Access Seeker the meaning must be clearly the same as outlined below:

Can be supplied by the sales agent or customer:

Account no relevant EAN/UAN/SN. V  
Telephone numbers V CRN - as  
appropriate

Information to be supplied by customer only:

- (a) Early and positive acknowledgement from the customer that they understand this transaction is not for information purposes and will result in their line and telephone number moving to <Gaining Operator>. It must be stated explicitly that the phone voice approval removes the need for them to sign a form.
- (b) Customer or Business account name.
- (c) Customer or Business account installation address.
- (d) If different, full name of person authorising the decision (name & position required if a business).
- (e) Positive acknowledgement that the customer is authorised to make the decision on behalf of the household or business.
- (f) Collection of a piece of privileged information that is not publicly available & able to be checked back with the customer e.g. date of birth, **mother's maiden name**.
- (g) Information on who to call regarding the progression of the customer order.
- (h) All services and features provided the current Access Seeker will be ceased and future services will be provided by the new Access Seeker.
- (i) Explicit acknowledgement that the customer wants to change resulting in a positive statement from the customer e.g. **"Yes, I wish to move my line and telephone number <Gaining Operator>".**

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Additional information to be given during the verification call



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- Must inform the customer they are being recorded at the start of the call.
  - Significant contractual conditions e.g. minimum contract, upfront charges.
  - Explanation that an order receipt and full terms and conditions will be sent to the customer.
  - Explanation of cooling off period and how the customer can cancel.

Other order information

- Date of verification

Script exclusions

- Sales or marketing material.
- Any information on promotions or incentives to encourage GLUMP

## 9 Recording

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The following rules apply to the recording of the verification call:

- (a) The recording must be audible, clear and easy to understand.
- (b) The entire transaction from the initiation of a call to the TPV live agent and all parties to the transaction must be recorded.
- (c) The recording must be retained for the period defined in the Product Service Schedule.
- (d) The Gaining Operator must be able to supply the individual customer recording to the Losing Operator in the event of a dispute. The recording should be supplied in a format which the customer can listen to.

## 10 Order verification and rejection

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After the verification script has been completed the order should be coded as having one of the following outcomes.

### A. Verified order

An order should be verified if the customer answers all questions positively and has supplied all the requested information. There should be no evidence of grounds for rejection on the part of the customer, the Access Seeker sales agent or the TPV supplier.

### B. Rejected order

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An order should be rejected if the customer does not answer all questions positively or has not supplied all the requested information (account number is an exception – see pending order). Also if there is evidence of grounds for rejection on the part of the customer, the Access Seeker sales agent or the TPV supplier.

### **C. Cancelled order**

A cancelled order is a verified order that is cancelled by the customer prior to the order being submitted to the Access Provider. These must be categorised for reporting purposes.

## **11 Grounds for order rejection**

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The following are considered grounds for rejection of an order.

### **The Customer:**

- (a) Disconnects the call or fails to complete the script.
- (b) Answers negatively.
- (c) Fails to give the required information or gives an obviously false response.
- (d) Seems confused **or doesn't clearly understand the process.**
- (e) Asks questions about the product during the process.
- (f) Cannot be clearly understood.

### **The Access Seeker's sales agent:**

- (a) Stays on the call after giving the account and telephone number(s).
- (b) Is involved in any way in the verification process.

### **The TPV agent:**

- (a) Actively encourages or pressurises the customer during the verification process.
- (b) Tells or suggests to the customer what to answer.
- (c) Gives marketing information of any kind to the customer e.g. pricing, services, offers etc. They are allowed to pass a contact number to enable the customer to contact a sales agent of the Access Seeker.
- (d) Offers any opinions on any Access Seeker
- (e) Offers inducements to customer.



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## 12 TPV CAF

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A copy of the TPV CAF should be sent to the customer. This must include the same information as the current CAF. In addition, the TPV CAF should indicate that this order was verified through a third party telephone call, the date of verification and - if different from the customer account name - the name of the person who verified the order.

Accompanying this order receipt should be full and written details of all the terms and conditions that the customer is subject to. These are considered especially important in the case of a TPV order, since there is no guarantee that this has been covered adequately during the sales call leading to the TPV verification.



Version Control History

Version	Status	Update	Effective Date
Version 1.0		Published as part of part of ARO	20 February 2009
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