



BMPPA Scheme for CH&N

**Project Activity 2
Customer Engagement for the
period**

01 Apr 24 – 31 Mar 25

**Version: 1.0
Date: 31 July 2025
Author: DCC
Classification: DCC Public**

Table of Contents

1. Introduction.....	3
Aspect 1: Timing and Frequency of Engagement.....	4
Aspect 2: Quality of Information provided by DCC	7
Aspect 3: Taking account of Customer views	8
2. Part 2: Supporting Evidence	10

1. Introduction

As part of the Communications Hubs and Networks (CH&N) Programme Baseline Margin Project Performance Adjustment (BMPPA) scheme, the Data Communications Company (DCC) are required to report on measures of engagement for the period 1 April 2024 to 31 March 2025. This period was largely focussed on delivering information to customers to enable them to make an informed endorsement of Live Service Criteria (LSC).

The following scores reflect DCC's view on our performance against the three questions, based on the evidence provided in Parts 1 and 2. Overall, we believe these scores reflect that there are no areas of material concern with the engagement that the programme has undertaken.

Aspect	Question	Score
Timing and frequency of engagement	Has the DCC communicated and engaged with its customers at appropriate times to seek their views, allowed sufficient time for customers to provide feedback, and provided timely updates on its activities?	3
Quality of information provided by DCC	Has the DCC's communication and engagement approach with its customers been tailored to the relevant audience and timed appropriately which enabled the audience to understand the issues to act on, and allowed sufficient time for the audience to provide feedback appropriately?	2.5
Taking account of customer views	Has the DCC clearly explained how the views of its customers have informed its decision making, and where relevant, why DCC has decided not to incorporate these views?	3

During the Regulatory Year (RY) the 4G CH&N programme had five key areas of engagement. To make our response easier to digest we have provided commentary and evidence against each of the five areas under each question. The amalgamation of each area then provides rationale for the overall score provided. The areas in question are:

- Live Service Criteria (LSC)
- Initial Pallet Validation (IPV)
- 4G Wide Area Network (WAN) Coverage
- Intimate Comms Hub Interface Specification (ICHIS)
- Regulatory Change

We note that the scores provided by the SEC Panel differ from our own. This appears to mainly stem from the conclusions of 4G WAN coverage assurance and relates to engagement not taking place until November, limited technical solution options and cost implications not being shared with customers from the outset. We have attempted to clarify in our response below the engagement that began in September 2024 and that technical solution options were discussed prior to RY24/25. We also hope the Department understand the fine balance between sharing economic impacts to customers as quickly as possible and ongoing confidential commercial conversations.

We hope that our response provides evidence of the depth and breadth of engagement that has taken place over the RY24/25 and that overall, the collaborative and transparent process has led to an engaged and informed customer base.

Part 1: Main Submission - Assessment Questions

Aspect 1: Timing and Frequency of Engagement

Has the DCC communicated and engaged with its customers at appropriate times to seek their views, allowed sufficient time for customers to provide feedback, and provided timely updates on its activities?

LSC

Developing, progressing and completing the Live Service Criteria for IPV entry (LSC1) and Mass Manufacturing (LSC2) have formed the core of DCC engagement over RY24/25. This reflects the importance of these key decision points.

Due to the significance and complexity of the go live process we sought early engagement with customers to ensure we were aligned on the approach, criteria and supporting evidence. In February 2024 we had begun discussing the approach to navigating the LSC process with the Chairs of the SEC Panel Sub-Committees. During March and April, we presented our suggested approach to the SEC Sub-Committees (CTG, OPSG, SSC TABASC, TAG) and conferred on the required criteria, the mechanisms for presenting evidence and the timing of decisions to get an optimum outcome. Following input from the committees we worked closely with SECAS to present the approach and plan to the SEC Panel for their endorsement in May 2024.

Following support for the process from the SEC Panel, we engaged with the sub-committees on a monthly basis between June and November for LSC1, and November to March for LSC2. During these meetings we provided updates on the agreed evidence (relevant for each committee) and provided a transparent view as to progression against each criteria. We believe this collaborative approach for the LSC process has proved successful. The importance of a clear and agreed process has allowed appropriate time for customers to input and for committee members to make informed decisions.

IPV

Recognising that customers would need support during the IPV stage, and that it would be beneficial to work in a collaborative way, we established the IPV Working Group (WG). The purpose of the group was to create a cooperative forum where any issues could be discussed and resolved in a timely and transparent manner during this critical phase of the 4G roll out.

The Terms of Reference for the IPV WG was first circulated in May 2024 and subsequently agreed by the CTG in June 2024. This was 6 months prior to IPV Go-Live and provided customers with sufficient time to understand the purpose of the group and to find suitable volunteers.

The group met 10 times between July and November. To ensure there was a wider understanding of discussions of the IPV WG, and to support the transparency of the progression of the IPV phase, a monthly summary of key topics of conversation was provided to the CTG. This also allowed for the efficient flow of information from CTG to IPV WG, facilitating CTG to raise questions directly with the group.

WAN Coverage

We are aware of the disappointed from customers regarding the position on 4G WAN coverage and that the coverage checker was set at 90% for IPV rather than the targeted 99.25%. We also note the frustration that issues with 4G WAN coverage were identified late in the programme and close to the IPV Go-Live date. However, for the purpose of this assessment it is important to separate the situation of 4G WAN coverage with how we have engaged customers on the topic.

We note from the SEC Panel response that it is felt that information was provided in an untimely manner and that DCC should have engaged earlier on the issue of coverage; since it is believed we knew of the situation well before engaging customers. This perception, whilst understandable with large amounts of information being shared in a fast-moving environment, is not accurate. It is therefore important to summarise key programme steps and related engagement undertaken so that a clear timeline can be understood.

The risk of 4G WAN coverage (noting it is based on a propagation model which has not been assured) has formed part of the monthly programme updates to CTG since before RY24/25. A resolution date of August 2024 has always been set for this risk on the proviso that this is when the coverage assurance work would be complete. Between April and August 2024 work was being undertaken to seek agreement of design specifications, agreement of the assurance methodology and completion of drive tests. Upon completion of these programme steps, DCC commenced analysis of the results in August 2024 in line with the programme plan. This explains why DCC did not engage prior to the end of August 2024 on the topic of 4G WAN coverage. It may well have been that these activities could have been carried out earlier in the programme and using a different assurance methodology (indeed we recognise TABASC have asked for a lessons learned to be undertaken on this point).

Following completion of DCC analysis, an independent expert was contracted to verify the findings during September 2024. At the CTG on 19 September 2024 DCC first raised the prospect of entering IPV with reduced coverage levels. It was noted that independent verification was ongoing during September, but that pending the independent review findings DCC believed IPV would need to be on reduced coverage. We acknowledge that at this stage reduced coverage was only sign posted, and that an exact figure of 4G WAN coverage was not made public. However, until completion of the independent analysis, it was not believed to be appropriate to share an unverified number with customers.

Upon confirmation from the independent expert that DCC's analysis was correct, engagement with customers began. Noting the severity of the issue, and that CTG, OPSG and TABASC were expecting information on coverage during October to help inform LSC decisions in November, DCC established a workshop on 15 October. The purpose of the workshop was to set out the coverage assurance work undertaken so customers could better understand the methodology that had been followed. It also intended to set out the results of the coverage assurance and provide customers with options for progressing into IPV.

As a result of feedback from customers received during the workshop on 15 October it was felt that DCC needed to consider and update their approach on coverage levels in the coverage checker before continuing to engage. Therefore, a TABASC X meeting scheduled for 17 October to discuss the workshop output was moved back to the regular TABASC meeting date of 07 November. After considering the feedback received from the workshop DCC shared the outputs and updated approach with the CTG and OPSG on 21 and 28 October respectively, and subsequently the TABASC on 07 November. At these meetings the approach to set coverage at 90% for IPV was shared alongside a commitment to return in November/December with a plan to increase coverage from 90% to 99.25%. The feedback from the meetings in October and early November fed into the SEC Panel recommendation for LSC1 Go-Live in November 2024.

It is important to clarify the above, as there is a perception that engagement should have commenced sooner. We note there was a gap from the DCC analysis completed at the end of August to the workshop on 15 October, but hopefully DESNZ will be aware that until verification from the independent expert we could not disseminate our findings more widely.

Following submission of LSC1, DCC returned to CTG, OPSG and TABASC in November, December and January outlining a plan for increasing coverage from 90% to 99.25%. Engagement on this topic continues.

Overall, there was a large amount of engagement on the subject of 4G WAN coverage over a short period. Noting the issue was only confirmed at the end of August we believe we have engaged with customers as soon as reasonably practical and as frequently as we could.

ICHIS

We have provided monthly updates on the progression of Radio Frequency (RF) noise testing to CTG throughout RY24/25. As part of those engagements, we have set out the process being undertaken and a clear indication of when testing results were expected. In June 2024, once the majority of testing was complete, we informed CTG that noisy Meters would not have to be replaced. This was as soon as practically possible. This messaging was further reiterated in August upon completion of testing.

In addition to CTG we provided regular updates to TABASC from May through September 2024, setting out the testing approach, potential impact and mitigating actions that could be taken. as soon as we could. Once it was clear that the findings of the wider 4G WAN coverage analysis might impact the resolution of the ICHIS question, a realistic timetable was set with CTG and TABASC so that customers were clear when to expect the final conclusions. These were presented to CTG and TABASC in March 2025 and the way forward supported.

We have already begun setting out the next steps for future ICHIS changes at CTG and TABASC to ensure customers are aware of suggested amendments, the approach we are taking and the timing of when they can comment.

Regulatory Change

To enable the implementation of the 4G CH programme, a number of changes were required to provisions within the SEC and supporting documentation. Two key areas were the introduction of the IPVAD and NETMAD (providing regulatory oversight) and amendments to the CHSI (required to support forecasting, ordering and delivery). During RY24/25 we have issued five consultations in support of these two key areas.

In addition to monthly updates on regulatory change at CTG, any proposed changes have been shared with relevant sub committees, prior to issuing consultations. This was not only to sign post the upcoming consultations to customers, but to also solicit feedback on the intended drafting. This approach has been appreciated by committee members.

Each consultation has provided a standard period of time for customers to respond. The exception being a consultation issued in June 2024 that has an expedited response window due to the snap election impacting scheduled designations to the SEC. Annex 2 provides further detail about the consultations issued including the time to respond and any supporting engagement undertaken to support customers in their response, for example webinars.

In conclusion

We have regularly kept customers up to date on progression of the programme attending 38 committees during the Regulatory Year. As noted above the LSC process was a large undertaking in engagement and we believe appreciated by committee members in providing as much information as soon as possible to enable informed decisions. Equally, regulatory change and IPV WG have been developed in a collaborative style and therefore customers have not only been informed in a timely manner but been at the centre of developments as they unfold. We appreciate the views on the timing of 4G WAN coverage, but as set out in the submission above we believe we have engaged as soon as practical. Equally, whilst a critical subject, 4G WAN should also not overshadow the broader engagement that has been consistent throughout this programme. We believe we have achieved a score of 3 in this aspect.

Aspect 2: Quality of Information provided by DCC

Has the DCC's communication and engagement approach with its customers been tailored to the relevant audience and timed appropriately which enabled the audience to understand the issues to act on, and allowed sufficient time for the audience to provide feedback appropriately?

LSC

As noted in section 1 above, the LSC process was developed with close engagement of the SEC Sub-Committees. A key consideration when developing the approach was ensuring to focus on each group's remit and expertise. As such we made sure that information on LSC criteria was tailored to each group's specific needs and centred on the information they would need to make informed decisions on the relevant element of the overall criteria. For example, we did not present information required for OPSG criteria at TABASC.

CTG was the agreed vehicle for general updates on progression of LSC. Consequently, we ensured there was not unnecessary duplication across the committees by repeating the same general updates in every forum. Where there was overlap between committees, the approach for sharing information was agreed upfront with the relevant Committees. For example, the timing and detail contained in testing updates that covered both OPSG and TAG.

IPV

IPV WG was established to discuss the detail of how the initial phase of 4GCH roll out was progressing and to find timely resolution to any issues encountered. As such, we sought volunteers from customers with the relevant expertise and supported them by providing relevant technical detail to ensure the group could deliver its aims. This information was distilled into a higher level summary for the CTG as part of the group's monthly updates.

Where required, the IPV WG also provided more technical information to other groups. For example, TABASC requested a presentation on a Sev 3 defect encountered as part of IPV. In order to meet the needs of TABASC a more detailed technical set of information was provided to TABASC than had been presented to CTG.

WAN Coverage

As noted in the section above we are aware of the disappointment of customers on the outcome of the 4G WAN coverage. We believe the information presented to members of CTG, OPSG and TABASC, via the October workshop and subsequent committee meetings, provided an easily accessible view of the issue and the options for progression. Therefore, whilst the message might be disagreeable the engagement was of sufficient quality to allow informed decisions.

We are also aware that the significance of 4G WAN coverage means customers want to see as much information as soon as possible. This has led to frustration that presentations in October and November did not include commercial and economic implications. Whilst we sympathise with this view, we hope DESNZ recognise that fine balance between keeping customers up to date and ongoing commercial conversations that cannot be prejudiced. We recognise making this clearer to customers is an area that can be improved upon.

We also understand customers desire to see a full and detailed plan for when coverage will move from 96% to 99.25%. Whilst it was possible to share accurate timelines for the progression of regression testing to allow the increase in coverage from 90% to 96% in the RY24/25, it was too early to be able to detail the timings and impacts of further workstreams such as roaming. This work continues to date, but we do recognise we can make the context and constraints of plans clearer to customers and set out when likely dates for further clarity will be.

ICHIS

ICHIS updates were tailored for the audience with the CTG receiving more general updates on progression of testing and potential impacts, whilst the TABASC received further technical details on the model types used and relating testing results.

Regulatory Change

Whilst the language within the regulatory documentation can often be complex and technical, we have sought to ensure the accompanying documentation provides a plain English explanation on the purpose of the consultation and any key messages customers may need. Examples of consultations and their supporting commentary can be found here www.smartdcc.co.uk.

As noted in the section above, we have provided Webinars to better allow customers to understand the changes being proposed and their potential impacts. Equally, we have provided monthly updates to CTG to provide an overview of the progress in regulatory drafting. Both of these mechanisms have been tailored to the audience to help support where customers may wish to focus their efforts when responding to a multitude of consultations across the industry.

In conclusion

Overall, we believe the quality of engagement has been to the standard customers should expect. We acknowledge that there is always room for improvement, particularly in more clearly sign posting when further information will become available so that customers can better understand the context of information they are being provided. We also recognise more could be done to reach those customers who do not attend SEC Committees, since this has been the main focus of engagement over the RY24/25. As such we believe we score 2.5 in this aspect.

Aspect 3: Taking account of Customer views

Has the DCC clearly explained how the views of its customers have informed its decision making, and where relevant, why DCC has decided not to incorporate these views?

LSC

During the LSC process DCC listened to feedback from the OPSG that the monthly updates contained too much detailed information and agreed to provide a more high level summary to the committee on a regular basis. The new updates identified any risks or issues that may have an operational impact in a more succinct way. The change in approach was well received from OPSG.

The output of the LSC process was a defined submission from the DCC to DESNZ. This submission clearly set out DCC's overall position and recognised the views from customers as contained in the SEC Panel's final submission.

IPV

The IPV WG was designed to be a collaborative experience, with DCC and its customers working closely together to get a successful outcome to the IPV stage. One of the key decisions undertaken in collaboration with the IPV WG was in the delivery of Mesh reporting. Following feedback from customers DCC provided an early view of candidates for mesh swap outs. This helped customers plan their IPV rollouts and test in a live environment that the swap outs would be successful.

WAN Coverage

We fully understand the significance of 4G WAN coverage to customers. As such it was important for us to include customers in the decision-making process from the outset. At the 4G WAN coverage workshop in October 2024 we set out three options for entering IPV with differing coverage levels. DCC's preferred option was to reduce the coverage checker to 90% providing greater certainty of successful connectivity. The rationale provided was that this would allow IPV to prove the 4G CH&N solution without the risk of wasted engineer visits or disappointed consumers.

At the workshop customers highlighted a preference for a different option with a less restrictive coverage checker. The rationale being to use the IPV phase to assess the performance of the Comms Hub across a range of different 'real world' signal strengths and not to constrain IPV to locations where there was confidence it would work without issue.

After careful consideration DCC maintained that the purpose of IPV was to assure the operation of the 4G CH solution, so set out to customers that the approach for a restricted coverage checker would continue. However, noting the feedback it was decided to use a proportion of the available IPV CHs to be installed in lower coverage areas so data could be collected via the IPV WG. This approach and rationale was provided to the CTG, OPSG and TABASC in October and November.

ICHIS

The majority of work undertaken on the ICHIS during RY24/25 has been in progressing the scope and approach as agreed with customers from the previous regulatory year, so there have not been many decision points. However, in November 2024 TABASC and CTG requested that sites with noisy meters be included in the IPV phase. DCC's original intent had been to exclude noisy meters at this stage, but based on the request from customers DCC took the decision to present analysis on sites with noisy meters to the IPV Working Group and CTG.

Regulatory Change

Each of the five consultations issued during this period each had an accompanying conclusions document that clearly sets out comments received and any actions DCC will undertake in response to those comments. Equally, following the conclusion of each consultation CTG received a summary of outputs and next steps in order to provide further transparency to customers.

In conclusion

During the RY24/25 we have clearly set out the rationale for any decisions made and been conscious to reference customer views when doing so. The approach to LSC and IPV WG has seen collaboration between DCC and customers on a monthly basis in shaping overall direction of the programme and has been well received. Due to the significance of the decisions on regulatory change and on WAN coverage, we have been clear on what decisions have been made and, as set out above, how customer feedback has helped shaped direction. Additionally, all of decision points been discussed in detail at relevant committee meetings. On that basis, we believe this aspect reflects a score of 3 for this aspect.

2. Part 2: Supporting Evidence

Annex 1 - BMPPA Scoring Methodology

Aspect	Evidence Guidance
Timing and Frequency of engagement	Expected timelines and frequencies for engagement should be set out clearly for DCC customers across projects and decision-making cycles, ensuring appropriate lead times for DCC customers to engage effectively. We would expect DCC to review these with its customers to ensure its processes are working and revise timeframes if necessary. The submission should provide specific evidence demonstrating when and how frequently DCC has allowed customers to feed in their views, as well as covering the frequency and timeliness of broader informative engagement. We would expect DCC to seek greater input, supported by appropriately detailed information, where decisions have greater potential impact on customers.
Quality of information provided by DCC	When assessing the quality of the information, we will consider: customers' ease of access to the information, the readability/comprehensibility of the information, and the level of detail and precision in the content. We would expect DCC to provide sufficient rationale for different options, providing where possible sufficient information around the expected costs of options in order for customers to give informed feedback. We would expect to see evidence that DCC has considered its audience when providing information and that the engagement is tailored appropriately, such as through the format of the information, level of technical detail, and the forums DCC chooses to engage. We would expect to see evidence covering engagement around change and project requests, as well as DCC's broader informative engagement.
Taking account of customer views	The submission should evidence that DCC has been clear when communicating to its customers which issues they can provide views on, and ensure that DCC has provided avenues for customers to seek clarification if needed. DCC demonstrating that it followed the recommendations of its customers in its decision-making processes would be strong evidence of high performance. However, DCC would also be able to demonstrate high performance by clearly communicating to its customers the rationale behind why, in certain instances, DCC made a decision that diverged from the views of its customers. DCC should evidence that it has closed the 'feedback loop', ensuring stakeholders have been informed of the outcomes as a result of their engagement. This should be carried out regardless of whether the recommendations of customers have been followed, with a strong rationale provided for DCC's decisions.

Score	Description
3	Strong evidence that DCC meets the required standard with minor areas of improvement – DCC is performing to the expected standard.
2	Evidence that DCC meets the required standard with very few material areas of concern and/or some minor areas of concern.
1	Evidence that DCC meets the required standard but inconsistent with some material areas of concern.
0	Limited evidence that DCC has met the required standard with multiple material issues of concern.

Annex 2

Summary of 4G CH&N consultations published at www.smartdcc.co.uk

Consultation	Purpose	Date opened	Date closed	DCC response published	Supporting Engagement
Phase 2 regulatory changes	The consultation sought views on: - The replacement of 2/3G Mesh CHs during IPV and enduring reporting on Mesh. - Provisions permitting the issuing of Device Certificates and Organisation Certificates to enable DCC to undertake the activities required for IPM of 4G Communications Hubs; - Closing of transitional arrangements to allow for IPV	24 April	22 May	13 June	The drafting of the phase 2 regulations was shared with CTG and OPSG prior to issuing consultation. SSC were engaged over the certificate areas of the consultation although it is noted this should have been done in advance of when it occurred. A webinar was held during the consultation window to support customer responses.
Further transitional provisions for the SEC	The General Election caused delays to the scheduled designation of the SEC, therefore minor regulatory changes required to continue transitional arrangements.	24 June	05 July	12 July	CTG were made aware of the need for the changes and why timescales were so short.
Proposed changes to the CHSI	Changes to confirm elements for 4G CHs such as the labelling and Advance Shipment Notification (ASN) format, CH status information and reset and reboot procedures	30 May	27 June	18 July	Proposed changes presented to CTG and OPSG prior to consultation being issued.
Phase 4 Regulatory changes	Updates to NETMAD and CHISM to incorporate: - enduring reporting on mesh, - remove redundant clauses to facilitate IPV go live	12 Sept	11 Oct	14 Nov	CTG, IPV WG, OPSG and TABASC engaged. Following consultation, an update on responses was also provided to OPSG and TABASC in addition to regular CTG briefing. A webinar was held during the consultation window to support customer responses.
Temporary CH ordering and delivery rules	DCC proposed changes to the TCHODR which would relax the forecasting requirements for Communications Hubs (CHs) in the 2/3G Central and 2/3G South Regions. The rules were designed to allow Parties greater ability to react to any unforeseen issues regarding 4G CH availability	09 Aug	09 Sept	09 Oct	Proposals received positive feedback from early industry engagement from the CTG and Supply Chain Working Group (SCWG) prior to consultation. Supported by SEC Panel on 24 September. A webinar was held during the consultation window to support customer responses.