

## 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 19th Bulletin reporting on our October 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

**Exchange Closures:** The Committee received an update from BT and Openreach's Regulatory Affairs Directors on the exchange closure programme. This sits within a broader programme owned by BT Group and covers a range of product migrations and network closures in addition to exchange rationalisation. The Committee heard that governance is being developed based on principles agreed as part of the Guidance Note 7 (GN7) review. Openreach has its own strategy and approach for areas delegated to it by BT Group. Openreach will manage exchange exit for regulated access services and will continue engagement with CPs in this respect. The Committee stressed the importance of continued transparency and engagement with Ofcom. The CAO was asked to provide regular updates to the Committee in future sessions, given the significant length of the programme. The CAO will also consider the requirements for ongoing monitoring to ensure the underlying principles of GN7 are respected in life.

**Systems Separation:** The Committee received updates from BT's CAO Director on systems separation activity. BT and Openreach are currently working with the business to assess outcomes-based technology-neutral options that will provide ongoing compliance and respect the purpose of systems separation. The Committee's feedback on progress and approach was provided.

**Regular reporting:** The Committee heard of ongoing monitoring of core processes intended to support the Commitments (financial planning, commercial processes and strategy) and projects. No significant issues of concern were identified.

BT's Communications Regulation Compliance team provided updates on several Commitments activities, including the Service Now remedial actions and links to systems separation activity.

BT's Director of Regulatory Affairs provided updates on the relationship with Ofcom and the DCR outcome of decent broadband for all (broadband USO).

## Commitments Cases

There were no new breach cases since the July 2022 meeting, but the Committee heard an update from BT's Communications Regulation Compliance team on proposed remedial actions in case **CAO-43: ServiceNow** that would align with the broader review work on systems separation. The Committee was supportive of the proposal and have recommended early engagement with the regulator.

Case CAO-43 will remain open (and in breach) pending completion of remedial actions.

## Our next meeting

The BTCC's next meeting will be on 30th January 2023  
CAO, December 2022