



Dave Clarkson
Group Director of Competition
Ofcom
Riverside House
2a Southwark Bridge Road
London
SE1 9HA

21 July 2020

Dear Dave

Wholesale Call Origination voluntary commitment

Ofcom is currently exploring if and how to regulate Wholesale Call Origination (WCO) over the next market review period (2021-25). As part of this, Ofcom may conclude that BT is no longer required to provide WCO on an SMP basis. Were this to be the case, BT would be willing to make the following voluntary commitments to industry in respect of WCO until Openreach ceases the new supply of WLR and ISDN2/30 circuits, and withdraws these products, in September 2023 and December 2025 respectively.¹

1. BT would be willing to continue to provide WCO, over WLR and ISDN2/30, to (i) new CPs until September 2023 and (ii) existing² CPs until December 2025.
2. In relation to the services in paragraph 1, BT would continue to:
 - a. provide network access on reasonable terms, conditions and charges;
 - b. maintain a published reference offer; and
 - c. notify changes to terms and conditions on the same basis as previously for this product.

¹ Openreach has announced that it will be ceasing new supply of certain products on which WCO depends, namely WLR and ISDN2/30, in September 2023 and will be withdrawing these products in December 2025.

² including any new CPs served up to September 2023

3. For the avoidance of doubt, paragraph 2a is intended to address only the risk of margin squeeze and does not preclude BT from raising its prices to reflect higher costs and/or to incentivise users to migrate off WCO onto IP-based products.
4. In settings its prices, BT would continue to consider the interests of vulnerable end-users.
5. These commitments do not apply for premises which cannot use WLR or ISDN2/30 because, under the WFTMR final statement expected in 2021 or as otherwise agreed by Ofcom, Openreach has been allowed to implement stop-sell or withdraw WLR or ISDN2/30 at an earlier date, or otherwise vary the basis on which it provides service.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Cathryn Ross', with a stylized flourish at the end.

Cathryn Ross