

## Your response

| Question   | Your response   |
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| <p><b>Question 1:</b> Do you have any comments on Ofcom’s proposed Work of Plan for 2026/27?</p> | <p>Confidential? – N</p> <p>Please see below comments</p> |

### CCUK Response to Ofcom’s Proposed Plan of Work 2026/27

#### About CCUK

1. Comms Council UK is a membership-led organisation that both represents and supports telecommunications companies that provide services to business and residential customers in the UK. We keep Britain talking in its various guises by providing or reselling voice services over data networks (VoIP) as well as other “over the top” applications including instant messaging and video.
2. The membership is a mixture of network operators, service providers, resellers, suppliers and consultants involved in a sector that is diversifying rapidly. CCUK represents its members at a policy level, builds coalitions to collaborate on industry initiatives and provides a platform to help members prepare for change, learn about new trends and develop new business relationships.

#### Introduction

3. We welcome the opportunity to respond to Ofcom’s proposed Plan of Work 2026/27, published in December 2025. Our response sets out general observations, followed by comments on specific policy areas relevant to our members. We trust this response will be of assistance and would be pleased to engage further with Ofcom on any of the issues raised.

#### General points

4. Having raised concerns for the last two years that too little attention was paid to voice services, a core component of the UK’s critical national infrastructure, we were pleased to see a number of initiatives relevant to our sector included in this draft plan. The focus on digital infrastructure security is essential at this time and clear guidance for all sizes of provider will be of great benefit.

5. We also welcome the inclusion of AI which is of course becoming increasingly adopted throughout the industry and is likely to be a more frequent challenge, as well as opportunity, in future reviews.
6. However, key challenges facing providers of voice services remain absent or under-developed, and continue to rely heavily on industry-led solutions without sufficient regulatory ownership or momentum.
7. While we recognise and support Ofcom's continued focus on connectivity outcomes, we believe this must be matched by sustained attention to the resilience, transition and operational frameworks that underpin voice communications for consumers, businesses and public services.
8. For example, the growth of 'over the top' messaging applications (e.g. WhatsApp) provide an increasing opportunity to move voice and messaging to services which fall outside the scope of telecoms regulation. Although the Online Safety Act provides some protections, we question if this area of communications needs a fresh review to take into consideration current usage trends, specifically the impact on fraudulent communications.

### **Gaining Provider Led Switching and Number Portability**

9. CCUK is concerned that once again there is no reference in the draft plan to the ongoing programme of work that began with the introduction of One Touch Switch (OTS). Now that OTS for residential services is delivering, we anticipate Ofcom's desire to improve business switching using similar principles.
10. The complexities of business switching, combined with a diverse and distributed supply chain, result in mixed incentives and commitment to delivering improvements. With a number of known and unforeseen challenges ahead, we would welcome clearer regulatory ownership and more direct engagement from Ofcom in relevant industry forums, to help maintain momentum and ensure solutions are deliverable across the full business supply chain.
11. As noted in response to previous Plans of Work, the current number portability process is not fit for purpose in the context of OTS. Despite calls for an overhaul for more than a decade, there remains no effective driver for change. CCUK members believe that, in order to achieve the intended outcomes of OTS, Ofcom should initiate a review of the existing porting process and its relationship with switching activities.

### **Fraud, nuisance calls, and scams**

12. Given the speed with which the fraud landscape evolves, we believe there is a need for consultations and policy responses in this area to be concluded and implemented at pace.

13. For example, the consultation on Mobile CLI Spoofing closed in October 2025, yet no subsequent statement or engagement has followed. In areas where significant investment and operational change are likely, and where the potential consumer benefit is substantial, we would like to see these consultations treated as a higher priority. Additionally, as our members are already today directing not insignificant resources in the fight against scam and fraud over communications networks, being able to ensure that these resources are directed at the issue in the most effective manner, today and in the future, has clear advantages both for the operator itself but also for the UK citizen.

14. Our members dedicate significant resources to responding to consultations and tackling fraud. We continue our commitment through participation in the Home Office Fraud Charter and will host our second Fraud Summit in April 2026. Furthermore, we continue to support the development of government initiatives to identify and tackle fraud. As noted in our previous response, this reinforces the need for a standing industry engagement mechanism on fraud, rather than reliance on ad hoc consultations.

15. Another project widely regarded as critical to the detection and prevention of fraud is traceback. Ofcom has previously indicated its support for this approach, yet it is not referenced in the draft Plan of Work. We believe that systematic review of technical advancements that could assist in the prevention, detection and reporting of fraud should form a core part of Ofcom's work programme.

16. Overall, we would appreciate greater clarity over Ofcom's strategy with regards to fraud and to what degree stakeholders will be able to engage.

### **Numbering Plan**

17. CCUK members are at the forefront of innovative use of the telecommunications network and feel that a review of the numbering plan is due. Technology and use cases have transformed in recent years warranting a fresh look at how the rules for each number type are applied and if they are still beneficial for the efficient and effective use of numbering resources. We also believe that there is value in considering a simplification of the UK numbering plan; many of the number types available in the UK today were introduced at a time when they had a real purpose but in today's market where mobile call originations are 6 times as common as fixed line origination and the vast majority of mobile users have at least some inclusive call allowance package, simplification (and release of scarce numbering

resources) could be considered by Ofcom. A simplified and modernised numbering plan would also permit Ofcom to put in place a Numbering plan fit for the future as well as one that is simpler for the UK consumers; we believe this could have real value in re-establishing lost trust in the communications market and making scam calling more difficult.

### **PSTN switch-off**

18. CCUK notes that, while the transition away from the PSTN continues at pace, there is no explicit reference in the draft Plan of Work to ongoing public awareness, resilience assurance or cross-sector coordination.

19. Our members remain concerned that awareness of the implications for business and other critical applications remains low. As stated in previous responses, CCUK continues to believe that an independent and authoritative public awareness campaign, similar to that used for the digital television switchover, is necessary to minimise harm and disruption. While we recognise that this may sit beyond Ofcom's statutory remit, the regulator is uniquely placed to advise Government on the urgency and scale of this requirement.

### **Business impact**

20. The consultation specifically invites feedback on behalf of small businesses, and we again submit our request for a dedicated 'business champion' within Ofcom. The majority of consultations, including this one, understandably focus on individual consumer protections; however, small businesses are often underrepresented despite facing many of the same challenges.

21. An individual or panel with expertise in business communications markets, embedded within Ofcom's governance structures, could engage directly with business-focused networks and service providers and bring this insight into policy development. We believe this would materially improve regulatory decision-making and policy outcomes for business users.

### **International outlook and cooperation**

22. We welcome Ofcom's commitment to continue to monitor how emerging technologies, regulatory developments and evolving market dynamics might impact on the UK telecoms sector. Not only the EU Digital Market Act will have direct relevance to operators and consumers in the UK, but with communications platforms, use cases and customer expectations increasingly being less constrained by borders, a close and effective collaboration with European and international regulators and bodies will be of critical importance to delivering regulatory objectives within the UK. We at CCUK and our members welcome continued Ofcom focus with the CEPT, OECD, IRG as well as the Global Informal Regulatory Antifraud Forum (GIRAF) and its collaborations with the industry led One Consortium.

23. In this regard, we would welcome Ofcom's express commitment to follow the developments of the EU Digital Networks Act. The outspoken intention behind the Regulation is to speed up, complete, the Single European market in many areas that will continue to affect operators, consumers and regulatory policies even in the UK, outside the jurisdictional catchment area of the Regulation itself. For example, with platforms, operators, and consumers increasingly being cross border, regulatory policy decisions in the EU on matters such as anti-fraud and scam will be of material significance in the UK; trust in communications services (as well as fraudsters) do not follow country borders.