

Your response

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<p>Question 1: Do you have any comments on Ofcom's proposed Work Plan for 2026/27?</p>	<p>Confidential? – N</p> <p>The FCS welcomes the opportunity to comment on Ofcom's proposed Plan of Work 2026/27.</p> <p>The Federation of Communication Services (FCS) represents companies which provide professional communications solutions to business users. Our members deliver telecommunications services via mobile and fixed line telephony networks, broadband, satellite, wi-fi and business radio. Our members' customers range from SMEs, home-workers and micro-businesses up to the very largest private enterprises and public sector users. Some FCS members also have some consumer customers. FCS is the largest trade organisation in the professional communications arena, representing the interests of around 350 businesses, which supply B2B services nationwide.</p> <p>Ofcom has a key part to play to ensure that the UK telecoms market remains competitive, and that both consumer and business customers are adequately protected. The FCS broadly welcomes the Work Plan and agrees that the primary areas of focus remain relevant and appropriate. However, we continue to be concerned that the needs of business customers and business communication providers (CPs) and managed service providers (MSPs), particularly resellers, are not adequately addressed and urge Ofcom to appoint a business lead/champion with responsibility for promoting the UK Government's growth agenda. There also needs to be a more detailed understanding of the business market, particularly the complex supply chain, so that the implications of regulation on the whole market are better understood.</p> <p>It is unfortunate that the workplan has been published before the Government's Statement of Strategic Priorities (SSP) for telecommunications, the management of radio spectrum and postal services has been finally issued. Clearly, Ofcom needs to have its plan of work in place before the new financial year, however it will be important that there is opportunity to revisit the Plan of Work following the publication of the SSPs as this may</p>

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	<p>impact the strategic direction in some areas. The FCS believes that the SSP places more emphasis on the needs of business than is reflected in the proposed Plan of Work.</p> <p>The Plan of Work is well structured and clear, however, given the increasing convergence in the communications market it is important that Ofcom's work is not stove piped and there needs to be safeguards to ensure that there is adequate thinking across work areas. For example, fixed, mobile, satellite and IP convergence. This is particularly important to avoid competition concerns and economic bottlenecks which are magnified when accompanied by vertical integration of network/infrastructure providers.</p> <p>As a final general point, we would urge Ofcom to consider how they can better facilitate change management across the industry. A number of areas in the Plan of Work require industry solutions (e.g. migration from legacy services, tackling scam calls) and it is important that Ofcom considers the impact on the wider industry and does not take a narrow view led by just some of the very large providers.</p> <p>In relation to Priority area 1 – Internet we can rely on - we have the following comments to make:</p> <p>We are pleased that Ofcom recognises the importance of competition. The business market plays a vital part in stimulating investment across the UK economy, and the importance of smaller businesses to the UK economy must not be underestimated.</p> <p>FCS members provide innovative solutions to tens of thousands of businesses which drive economic growth throughout the UK and need a competitive and supportive telecoms market to flourish. Whilst it is right that Ofcom focuses on outcomes for consumers, the FCS believes that there should also be a focus on outcomes for business customers, and indeed the many smaller CPs, MSPs and resellers that provide services to them. One of the successes of regulatory intervention over the last two decades has been the proliferation of providers in the small business market which has driven innovation and price competition to the benefit of business and retail customers, and of the wider UK economy. The FCS is,</p>

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	<p>therefore, very disappointed with the lack of proposed focus in the Work Plan in areas that matter to UK businesses and UK business providers.</p> <p>The FCS believes that Ofcom should appoint a business unit/lead/champion with responsibility for promoting the UK Government's growth agenda. There also needs to be a more detailed understanding of the business market, particularly the complex supply chain, so that the implications of regulation on the whole market are better understood.</p> <p>The FCS welcomes the focus on Mobile Connectivity, though it believes that there is a significant work package missing from the Plan of Work. Currently, there is no right to wholesale access to mobile services, and this can have a significant impact on smaller CPs and resellers. This is particularly acute as all three mobile networks in the UK are now vertically integrated. The FCS believes that Ofcom should undertake a review of the wholesale mobile market which a view to ensuring that there is appropriate access that does not disadvantage smaller CPs/MSPs/resellers.</p> <p>Telecoms and Digital Infrastructure Security is clearly a key issue for the whole industry, and we support Ofcom's focus here. It is important that lessons and learning are shared across the market.</p> <p>Given the way the Telecommunications market is currently regulated, the work on the Telecoms Access Review (TAR) is welcome and required. However, the FCS believes that further work is needed to address growing convergence in the industry. For example, as mentioned above, the FCS believes that access to mobile networks on an 'equality of access' basis, needs to be established alongside access to physical (fibre/copper) services. Ofcom should also consider looking at IP infrastructure, rather than the traditional silos that the current regulatory regime addresses. Regulation is needed to address both the physical infrastructure providers and the application providers (Teams and WhatsApp), and the FCS believes that urgent work is needed to understand and address the new market realities that are shaping the industry.</p> <p>Additionally, the FCS is concerned that the current Work Plan ignores the very important 'reseller' market and</p>

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	<p>would very much like to discuss member concerns in this area with Ofcom. Over the past few years there has been a strengthening of consumer protection, which is to be welcomed, but most of the regulation has been focused at the retail level, which in turn has implications for resellers, who, unlike vertically integrated providers, are fully exposed to the additional costs of regulatory changes.</p> <p>There are several specific issues we believe should be included in the Ofcom Work Plan to ensure that there is sufficient regulatory and industry focus. Whilst these are business focused, there is significant cross-over between the residential and small business market and they can also have detrimental knock-on effects to their consumer customers.</p> <ol style="list-style-type: none"> 1. Business Switching (of Voice and Broadband services) is an important area to encourage growth and needs to be included in the Plan of Work. Improvements to the Number Porting process for business customers need to be addressed urgently, as without changes in this area effective Business Switching will be difficult to achieve. 2. The FCS was also disappointed to see no mention of the Common Telephone Numbering Database (CDB) in the Work Plan. NICC has already specified a CDB definition, but further work is required before implementation. The NICC Task Group is currently looking to develop an agreed UK process to ensure the data held by CPs is consistent. Inclusion of the CDB in the Ofcom Work Plan would provide the area with much needed focus and attention. 3. Linked to Business Switching is the difficulty and cost of switching wholesale provider and this is causing issues throughout the complex supply chain. These issues can disadvantage both business and consumer customers, as retail providers can be limited in both their commercial and product offerings. 4. Battery Back-Up is another pan-industry issue which would benefit from specific focus in the Work Plan. Network resilience is a key issue and is included in the Work Plan, and the FCS would like to see specific focus on battery and power back-up. The FCS believes that there should be standardisation across the industry and that

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	<p>infrastructure providers are best placed to deliver solutions efficiently. Requirements at the infrastructure level would help competition, reduce barriers to entry and help to reduce e-waste, leading to a more sustainable industry solution.</p> <p>5. Given consolidation in the market and the general economic outlook, the FCS also believes that the Plan of Work should consider commercial failure and how residential and business consumers will be protected in the event of an infrastructure provider, wholesaler or retail provider going out of business.</p> <p>In relation to priority area 4 – Enabling wireless services in the UK economy the FCS has the following comments.</p> <p>The FCS supports Ofcom’s proposals in relation to Spectrum Sharing as a good start.</p> <p>The FCS believes that Ofcom has illustrated, in its handling of SS-DABs, that increased spectrum efficiency and thereby competition can be achieved in certain conditions. However, caution is advised and members have raised concerns that in some cases actual deployment does not match the licence conditions thus denying the opportunity to others to provide service. The FCS would welcome the opportunity to discuss these concerns with Ofcom.</p> <p>In relation to Meeting the evolving demand of spectrum for wireless broadband, we were very interested in Ofcom’s focus on exploring potential benefits of a consistent future approach to defragmentation of holdings in mobile spectrum bands. The FCS would very much like to discuss this with Ofcom and explore how this could be used by business radio providers.</p> <p>The FCS also supports Ofcom’s review detailed in the focus area: Meeting the evolving demand of spectrum below 1 GHz. This spectrum is at the heart of business radio applications and has the potential to help UK plc growth targets. The FCS is very keen to be involved in any review work in this spectrum.</p>

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