



**Consultation response:
Ofcom's proposed Plan of Work 2026/27**

February 5, 2026



Introduction

Twilio is a global B2B Communications Platform as a Service (CPaaS) provider. Our CPaaS products allow our business customers to communicate with their customers/end users over voice, messaging including SMS and RCS, and email, with features that companies have added into applications across a range of industries, from financial services and retail, to healthcare and non-profits.

Twilio Ireland Limited provides these services, including SMS, and recently launched an RCS offering within the UK, as well as in other jurisdictions. In the UK, Twilio will typically procure capacity and services from mobile network operators (MNOs), resellers and other third-party providers, which we then package and integrate to provide to our business customers in order to meet their business requirements (e.g. integration via Application Programming Interface (API) tools for messaging). Our platforms help our UK business and charity customers better connect with their customers.

We welcome the opportunity to comment on Ofcom's Plan of Work for 2026/27, and look forward to Twilio's continued engagement with you over the coming year. An effective regulatory framework that provides confidence for businesses and the scope for innovation is critical to Twilio's operations in the UK.

Artificial intelligence

Twilio is an industry leader in building Conversational Intelligence, and our tools allow businesses to use AI to deploy AI agents, chat with customers, route calls, send emails, and ultimately improve customer experiences.

Twilio welcomes Ofcom's recognition of the pro-innovation role it has to play in supporting AI in its sectors, and creating confidence in AI products amongst both businesses and consumers. We look forward to Ofcom's update on how it regulates AI later this year, and hope to see the continuation of a pro-growth, that allows businesses to explore and experiment with new use-cases, and deploy AI at scale without putting sensitive data or customer trust at risk.



A2P SMS market reviews

In October 2025, Ofcom cancelled its Wholesale A2P SMS Termination Review, following voluntary commitments on pricing from major Mobile Network Operators (MNOs) through to the end of 2028.

While we hope that this commitment will remain in place through the duration, Ofcom's Plan of Work for the coming year should recognise this as an area for continued monitoring, as set out in its October 2025 statement.

Telecoms security

Twilio supports Ofcom's proposed enhanced supervision and monitoring of communications providers' compliance with security duties under the Communications Act 2003.

As Ofcom prepares for its new duties under the Cyber Security and Resilience Bill, Twilio urges Ofcom to ensure that any additional regulation is joined up with other regulators, including the ICO, and aligns with requirements already included in the Telecommunications (Security) Act 2021, to avoid duplication while maintaining robust security standards.

Twilio

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