

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

6th February 2026

About UKCTA

1. This submission is made by the UK Competitive Telecommunications Association (UKCTA). UKCTA is a trade association promoting the interests of fixed line telecommunications and broadband companies competing against BT as well as each other, in the residential and business markets. Its role is to develop and promote the interest of its members to Ofcom and the Government. Details of membership can be found at www.ukcta.org.uk. Its members serve millions of UK consumers.
2. There are a number of examples of Ofcom's positive actions that UKCTA members are pleased to be able to support and encourage.

Recognition of Ofcom's Evidence Based Approach to in-Contract Price Rises

3. UKCTA would like to commend Ofcom for the clear, decisive and rational stance it has taken so far on in-contract price rises. This intervention, particularly in response to concerns about unexpected increases by providers, demonstrates a robust and proactive commitment to ensuring that consumers are treated fairly and can navigate the telecommunications market with confidence. As outlined in the letter from Dame Melanie Dawes to Liz Kendall on 7 November 2025, Ofcom acted swiftly to remind providers of its expectations, reinforcing the principle that customers should always be fully informed about the terms they agree to.

Effectiveness of the Competitive Telecoms Market

4. Ofcom is correct to note that the UK retail consumer telecommunications market remains highly competitive. Real-term prices have declined in recent years, despite consumers benefitting from faster broadband speeds and significantly larger mobile data allowances. Communication providers in the UK have consistently delivered substantial and measurable benefits to consumers. This progress has been achieved through ongoing investment despite a trend of falling real-terms prices, ensuring that consumers receive ever-improving services at increasingly affordable rates.
5. These advancements have also fostered greater accessibility and inclusivity, allowing more households and businesses to benefit from reliable connectivity and innovative digital

services. As the sector evolves, providers have shown a commitment to adapting their offerings to meet the changing needs of customers, including the rollout of next-generation networks and enhanced customer support initiatives. With wide support for social tariffs, the UK communication sector is serving consumer well. This ongoing evolution not only strengthens the UK's digital infrastructure but also equips consumers with the tools and confidence required to participate fully in an increasingly connected society.

6. This is a clear endorsement of the strength and effectiveness of the UK's pro-competition regulatory framework. As highlighted by Dame Melanie Dawes, consumers are "getting more for their money," with improvements in service quality, increased data usage, and consistent investment in secure and reliable networks.

Transparency and Regulatory Responsiveness

7. Competition is functioning effectively, consumers have genuine choice, and most providers are acting transparently and responsibly. It is encouraging to see Ofcom clearly acknowledged the balance between ensuring that customers are afforded a suitable level of protection and supporting providers in their efforts to invest, innovate and compete. Ofcom's actions earlier in the year to enhance transparency around in-contract price terms have evidently had a positive impact.

Empowering and Protecting Consumers

8. At a time when cost-of-living pressures remain significant, Ofcom's leadership, reinforced through its ongoing dialogue with the Government shows that the regulatory system is delivering as intended: empowering consumers, ensuring fairness, and upholding trust in a sector that is integral to daily life. The combination of strong competition, clear regulatory expectations, and Ofcom's constructive collaboration with both providers and Government gives confidence that UK consumers will continue to be well-served and well-protected.

Matters that should be considered by Ofcom

9. There are areas where UKCTA believes that Ofcom's further focused intervention would be helpful. There needs to be greater focus on certain specific issues in the fixed market (examples in the following paragraphs). We expect, however, the general reduction in effort when it comes to the fixed line market (particularly with the completion of the TAR) to result in lower fees in 26/27.

Levelling the playing field with Online Communication services

10. UKCTA members acknowledge that Ofcom recognises the substitutional effect that Online Communication Services (OCS) are having on landline and mobile call volumes with the migration of large and growing amounts of traffic to those various platforms.
11. As we detailed in our response to the Review of Call Termination Markets¹ we are of the view that Ofcom's approach is unsustainable, and with consumer protection foremost in our minds we are aware that fraudsters are now attempting to lure their victims away from their phone services onto these platforms where they attempt to perpetrate fraud by exploiting the weaker protections in place. The distinction in the mind of the consumer between all these alternative communication platforms is breaking down and this needs to be recognised by Ofcom. The publication of the Annual Plan is the perfect opportunity for Ofcom to publicly set a timetable for considering in depth these matters relating to OCS.

The Need for Reform in the UK's Emergency Service Call Handling Provision

12. UKCTA has for many years encouraged Ofcom to undertake a root and branch review of the provision of emergency provision. The UK's emergency service call handling system has changed little since Ofcom was formed and the implementation of the General Conditions of entitlement regime. It still relies on initial 999 calls answered by a nominated emergency call handling centre, then routed onward to a network of first responder contact centres, often with differing connectivity arrangement. Most funding for the service comes from a

¹ [UKCTA Response to Ofcom Reviews of Call Termination Markets and End-to-End Connectivity Condition](#)

small group of communication providers, placing an unfair strain on the sector. Aside from the general requirements of the TSA, the regulatory obligations reside only on the call originating Communication Providers, yet they are accountable for only the first element of the call path.

13. UKCTA believes a comprehensive redesign is needed to modernise the system, improve funding arrangements, and ensure fairer cost distribution and appropriate regulatory obligations on all those providing elements of the service. Greater transparency, broader funding participation, and closer scrutiny of costs and service design are essential for equity and accountability.
14. Ofcom should work with government, providers, and stakeholders to create a well-designed, fairly funded emergency call handling system whose resilience is assured end-to-end. It is recommended that Ofcom initiate a review project later this year to address these issues and drive transformation.

Auto compensation Regime

15. With the increase in rates of compensation to be paid to consumers going forward, there will be an increasing gap between what CPs receive from Openreach by way of compensation and what we must pay out. There is a concern that if this keeps happening the auto compensation voluntary regime will come under strain and participants may eventually decide to withdraw which would obviously hurt consumers.

Competition Supervision Programme

16. We note Ofcom's intention to enhance its competition supervision programme. UKCTA supports Ofcom's continued focus on robust competition oversight across telecoms markets. Effective monitoring and enforcement of market review obligations is essential to ensuring that all providers can compete on a fair and equivalent basis.
17. In particular, we welcome Ofcom's commitment to overseeing Openreach's compliance with the rules established in the Telecoms Access Review 2026. Strong supervision of physical infrastructure access (PIA) and Openreach's commercial offers is critical to

preventing distortions, ensuring equivalence of access, and enabling sustained investment by competitive providers.

18. We also support Ofcom's intention to monitor competition aspects of the copper retirement and exchange exit process. Given the scale and complexity of these programmes, close oversight is necessary to safeguard consumers, maintain service continuity, and ensure that alternative network providers are not disadvantaged, especially in areas where their deployment or migration plans intersect with Openreach's timelines.
19. UKCTA encourages Ofcom to maintain transparency in its supervisory activity, provide timely guidance where issues arise, and intervene decisively in cases where behaviours risk undermining fair competition or consumer outcomes.

Consumer Supervision Programme

20. We would welcome a commitment from Ofcom to expand their focus from larger providers so that compliance in the wider market is being considered and issues are effectively addressed.

Telecoms Security

21. Ofcom's forthcoming review of its Telecoms Procedural Guidance is an opportunity to calibrate the impact of rolling information requests on providers. Completing broad, frequent requests is resource-intensive and can draw effort away from essential operational security work. We recommend inviting Ofcom to adopt a more targeted, risk-based approach to information gathering that preserves supervisory visibility while reducing unnecessary administrative burden.

Cyber Security and Resilience Bill

22. We note that the Cyber Security Resilience Bill is still going through the house but will eventually land with Ofcom for oversight. Upon receipt, we suggest that Ofcom adopts a proportionate approach that recognises overlap with the TSA in the UK and NIS2 in relation to the EU Cyber Security and Resilience Bill and the updated NIS regulations. Many providers will be subject to one or both regimes. To avoid a fragmented landscape, Ofcom must

ensure consistency, reference international standards, and recognise equivalent compliance across frameworks. We would also discourage replicating a TSA-style rolling information request model in the CSR/NIS context, given the associated burden and potential to distract from operational resilience.

Spectrum and Shared Access Licenses

23. We welcome Ofcom's planned review of spectrum propagation models and support the drive to strengthen operational delivery. However, it would be helpful to highlight practical process improvements for applicants and licence holders, including pre-application discussions for innovative deployments, options for bulk applications covering contiguous areas, allowing applicants to specify equipment operational ranges to avoid unusable allocations, and releasing proposed licence details prior to invoicing so that applicants can confirm suitability before committing to payment. We would further encourage Ofcom to revisit cluster-based fees or licences for large campus-style sites such as ports and manufacturing hubs.

Administrative fees

24. UKCTA has corresponded and discussed with Ofcom at length about our concerns surrounding the Administrative Fees regime. We appreciate that in 24/25 and 25/26 Ofcom was heavily occupied with the TAR and implementation of the telecoms security obligations, but having reviewed the draft annual plan of work for 26/27, we note the paucity of workstreams specifically related to fixed communications. In addition, the TAR decision is due before the start of the 26/27 year and therefore we would expect that the amount of TAR focussed work will be significantly reduced. On the basis that much of Ofcom's work in 26/27 will be focused on areas not relevant to fixed communications we would expect this will work through to the equitable split of sectoral funding of Ofcom.

25. We note that Ofcom produces a draft budget alongside the draft Annual Plan of Work consultation. On a review of previous years there is little evidence that the Annual Plan of Work differs in any significant way from the drafts. On that basis therefore, we believe there is merit in our proposal that alongside the draft Annual Plan of Work, Ofcom could,

alongside, produce a draft budget indicating anticipated network and service charges and level of admin charges across all sectors that it regulates. As the plan of work dictates the funding split amongst the different regulatory sectors, this would give all those regulated full transparency and confidence that the split of costs fully aligned with the Plan of Work.

26. One further point in relation to the administrative charge is that published lists of communications providers changes little from year to year. We encourage Ofcom to be as effective in collection of network and service charges. We note that there was a small reduction in the number of CPs liable for network and services charges in 25/26 as opposed to 24/25.

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