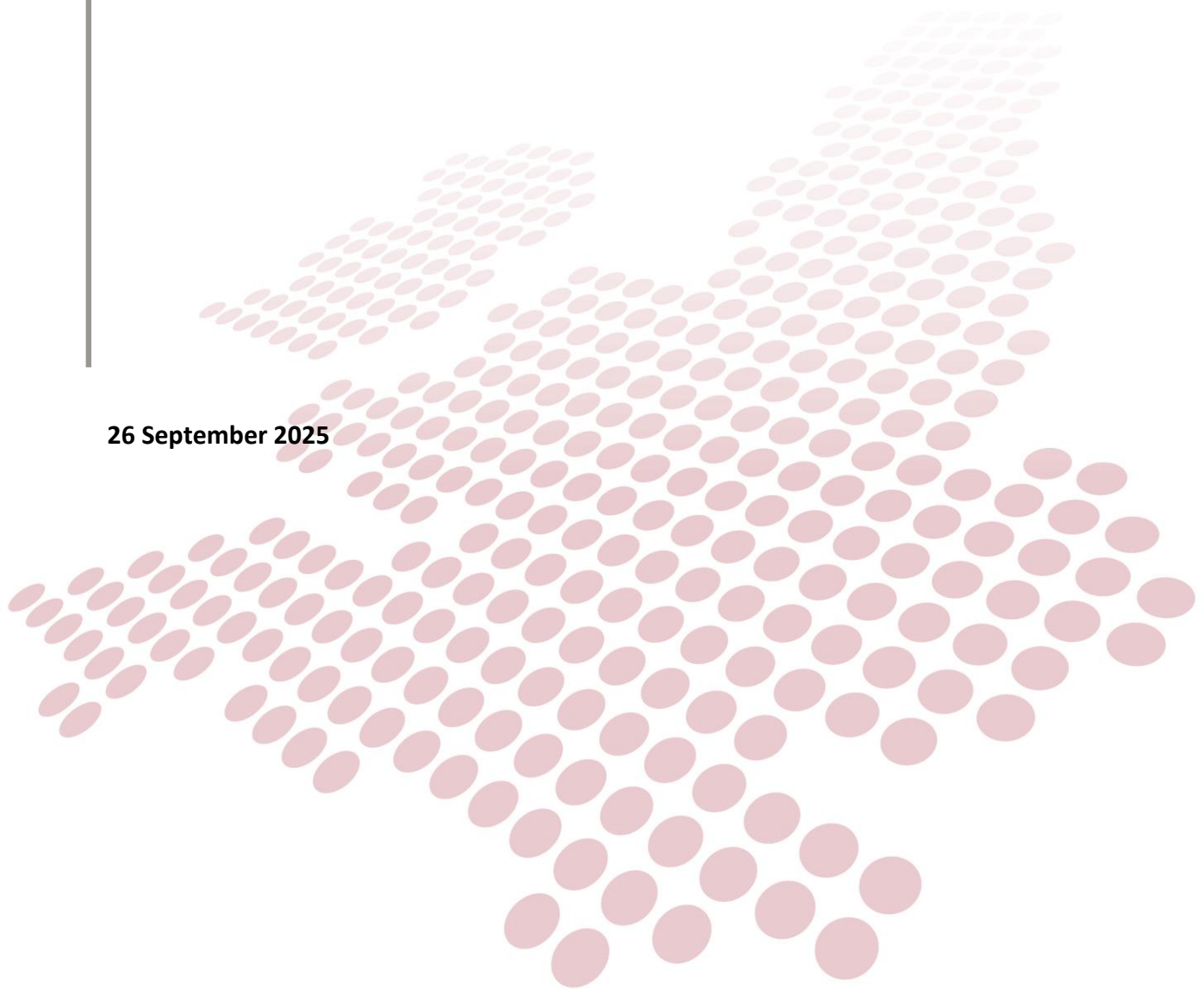


**Response to Ofcom Free-to-Caller
Wholesale Regulation
Review**

26 September 2025



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.

Summary

2. UKCTA is broadly supportive of Ofcom's proposals in that they provide a form of stability and predictability in the market for Free-to-Caller call origination. UKCTA agrees that if Ofcom were to dispense with the Access Conditions in their entirety, it would cause unwelcome disruption and distraction in a declining market.
3. We note that Ofcom in this consultation has not given due consideration to the underlying costs of originating these types of calls and how those costs have changed over the last 10 years yet seeks to maintain the obligations on all CPs to originate this traffic at no incremental cost to their own customers. Ofcom appear to balance this anomaly against the relatively small and declining levels of Free-to-Caller traffic in the UK without recognising how the charges at the current wholesale levels have impacted the, still large, number of UK enterprises to deploy 080 numbers in support of their business objectives, against a widening range of substitute routes to market.
4. Therefore, whilst our members welcome the continuity that Ofcom propose to bring to the market for Free-to-Caller call origination, we are neutral on how Ofcom has arrived at its conclusions and reserve our position in respect to Ofcom's decision not to review in detail the fairness and reasonableness of the current charges for fixed and mobile origination.

Issues

5. We are supportive of Ofcom's proposal to maintain the current access conditions. Whilst agreeing that failing to do so would create risk of market failure we suspect that wider risks could manifest as well. To pick just one example, during the period of the current regime our members have had a number of commercial AIT (Artificial Inflation of Traffic) disputes suspecting that certain parties had inappropriately interposed their networks in the flow of traffic to benefit from 080 origination outpayments. An ability to inflate these rates above a fair and reasonable level, provided by the removal of the access conditions, would make such instances more likely to occur. We are disappointed that Ofcom does not consider it appropriate to review the level of charges that would be fair and reasonable today. An assessment was first provided as part of the original 2013 Statement, recognising that the origination charges were a major part of the expected outcomes from the imposition of the access conditions. It is more than 10 years since Ofcom expressed a view on level of charge (the 2014 determination) and since then there have been significant technological changes and periods of significant inflation. Ofcom say it is ready to review the matter subject to reasonable requests from stakeholders should the access conditions be maintained.¹ The impact the current commercial construct has and will continue to have on UK business should be considered now, and Ofcom should not wait to be asked, but rather commit to conducting such a review as soon as it has confirmed it will maintain the access conditions.
6. UKCTA is supportive of the proposals in Section 5 of the consultation document. They are required to ensure that all CPs operating in the market for Free-to-Caller origination and termination are competing and trading on an equal basis.

End

¹ Paragraph 2.41