

# Correction note

## Business messaging: Review of the A2P SMS termination market

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On the 28 January 2025, we published a consultation titled '[Business messaging: Review of the A2P SMS termination market](#)', setting out proposals for regulating the market(s) for the wholesale termination of Application-to-Person Short Message Services (A2P SMS). A2P SMS is the most common form of business messaging service and enables businesses and public sector organisations to send text messages in bulk to customers and the wider public.

### Correction and clarification at paragraph 3.57

Since publication of that document, it has come to our attention that the description of the volumes data for WhatsApp for Business conversations shown in **Figure 3.5** was incorrectly characterised in **paragraph 3.57**. Specifically, the volumes data for WhatsApp for Business conversations shown in Figure 3.5 relates to conversations which were sold by Meta directly to business senders. It does not include volumes of WhatsApp for Business conversations which were sold by Meta indirectly to business senders, through Messaging Service Providers / Aggregators.

Additionally, we have discovered an arithmetical error in the calculation of the percentages set out in paragraph 3.57.

Therefore, paragraph 3.57 should read as follows, with an additional footnote (the words marked in underlined text indicate the insertions, while the words marked in strike-through indicate the deletions):

“Figure 3.5 summarises the evolution of RBM Messages terminated by the four large MNOs and WhatsApp Business conversations volumes sold by Meta to businesses directly<sup>65-bis</sup> over the last two years. This chart shows that volumes for both of these messaging services have increased from very low bases. The volume of WhatsApp Business conversations sold directly reached just below 40 million in 2024 Q1, with RBM volumes remaining much lower at just below 10 million. Although volumes for both of these messaging services have increased significantly over the last two years, volumes for A2P SMS remain much larger and are still growing, with direct sales of WhatsApp for Business and RBM volumes being circa ~~0.002%~~ 0.58% and ~~0.0005%~~ 0.09% respectively, compared to those of A2P SMS in 2023/24.”

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<sup>65-bis</sup> Meta could not provide volumes of WhatsApp Business conversations it sold via third parties as it does not hold this information. Meta, however, provided information on revenues it derived from such direct sales as well as sales via third parties, which are of comparable order of magnitude [~~3~~], respectively, in 2023/24. This suggests that volumes of direct sales are broadly similar to the volumes of sales via third parties.

The amendments shown above do not change our provisional view (set out at paragraph 3.57) that, while the volumes of WhatsApp for Business and RBM have grown significantly over the last two years, they represent a small fraction (0.58% and 0.09% respectively) of the A2P SMS volumes in 2023/2024.

**Clarification at paragraph 4.68**

Also, the reference to “just over 100 million conversations for WhatsApp for Business” in paragraph 4.68 relates only to conversations which were sold by Meta directly to business senders, excluding those sold through Messaging Service Providers / Aggregators.

Therefore, paragraph 4.68 should read as follows, with an additional footnote (the words marked in underlined text indicate the insertions):

“The current prevalence of A2P SMS services over other business messaging services is reflected in their respective volumes. While the volumes of WhatsApp for Business and RBM have grown steadily over the last two years, they represent a small fraction of the respective A2P SMS volumes. For 2023/24,<sup>123</sup> volumes of A2P SMS terminated by the four large MNOs were over 20 billion messages, compared with just over 100 million conversations for WhatsApp for Business (sold directly to business senders)<sup>123-bis</sup> and 18.7 million RBM messages over the same time period as shown in Figures 3.4 and 3.5.<sup>124</sup>”

The amendment shown above does not change our provisional view (set out at paragraph 4.68) that while the volumes of WhatsApp for Business and RBM have grown steadily over the last two years, they represent a small fraction (0.58% and 0.09% respectively) of the A2P SMS volumes for 2023/24.

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<sup>123-bis</sup> As described in footnote 65-bis, judging by the level of revenues derived from direct sales and from sales via third parties, these have volumes of similar order of magnitude.