



# Consultation response form

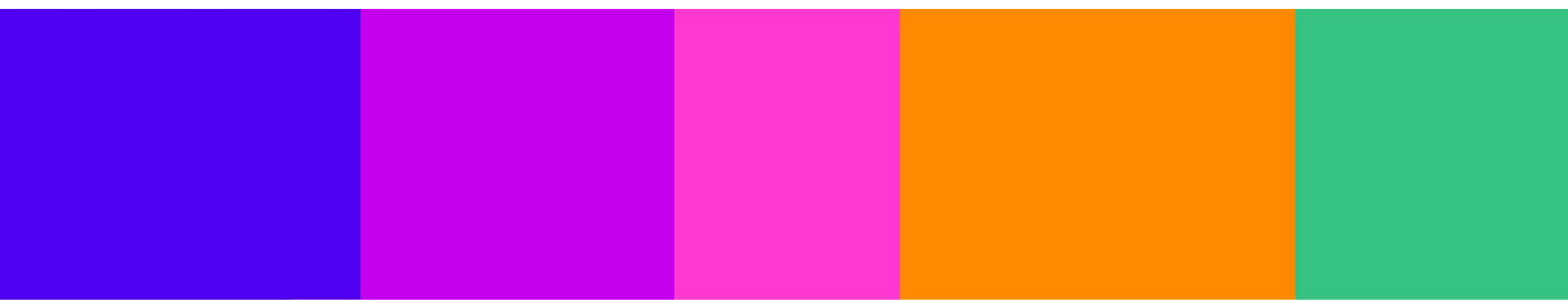
Please complete this form in full and return to [CallsReview2026@ofcom.org.uk](mailto:CallsReview2026@ofcom.org.uk).

<b>Consultation title</b>	Reviews of Call Termination Markets and End-to-End Connectivity Condition
<b>Full name</b>	
<b>Contact phone number</b>	
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	Firstsound Ltd
<b>Email address</b>	

## Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

<b>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.</b>	<del>Nothing / Your name / Organisation name / Whole response / Part of the response (you will need to indicate which question responses are confidential)</del>
<b>Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.</b>	<del>None / Whole response / Part of the response (you will need to indicate below which question responses are confidential)</del>
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	Yes / <del>No</del>



## Your response

Question	Your response
<p><b>Question 4.1:</b> Do you agree with our proposed market definition in relation to WCT?</p>	<p>Confidential? – N Yes</p>
<p><b>Question 4.2:</b> Do you agree with our proposed market definition in relation to MCT?</p>	<p>Confidential? – N Yes</p>
<p><b>Question 4.3:</b> Do you agree with our provisional view that it is appropriate to identify the WCT and MCT markets we have provisionally identified for the purpose of considering whether to make a market power determination, on the grounds that they meet the three-criteria test set out in section 79(2B) of the Act?</p>	<p>Confidential? – N Yes</p>
<p><b>Question 4.4:</b> Do you agree with our provisional conclusion that each provider of WCT has SMP in the market served by that provider?</p>	<p>Confidential? – N Yes</p>
<p><b>Question 4.5:</b> Do you agree with our provisional conclusion that each provider of MCT has SMP in the market served by that provider?</p>	<p>Confidential? – N Yes</p>
<p><b>Question 4.6:</b> Do you agree with the competition concerns arising from SMP in the WCT and MCT markets that we have provisionally identified?</p>	<p>Confidential? – N Yes</p>
<p><b>Question 5.1:</b> Do you agree with our proposals to maintain a network access obligation on all WCT providers and additional obligations that would be specific to BT's provision of WCT?</p>	<p>Confidential? – N Yes</p>

Question	Your response
<p><b>Question 5.2:</b> Do you agree with our proposed charge control on WCT?</p>	<p>Confidential? – N Yes</p>
<p><b>Question 5.3:</b> Do you agree with our proposal to maintain a network access obligation on all MCT providers?</p>	<p>Confidential? – N Yes</p>
<p><b>Question 5.4:</b> Do you agree with our proposed charge control on MCT?</p>	<p>Confidential? – N Yes</p>
<p><b>Question 5.5:</b> Do you agree with our proposal to maintain a reciprocity condition on the termination of international calls, subject to changes and clarifications set out in this document?</p>	<p>Confidential? – N Yes</p>
<p><b>Question 6.1:</b> Do you agree with our proposal to maintain the current network access condition requiring all WCT providers to provide interconnection, accommodation and related services required to access WCT and to maintain Ofcom’s guidance in relation to the technical standards used by telecoms providers for IP interconnection?</p>	<p>Confidential? – N Yes</p>
<p><b>Question 6.2:</b> Do you agree with our proposal to update Ofcom’s guidance about BT’s interconnection and accommodation charges?</p>	<p>Confidential? – N</p>
<p><b>Question 6.3:</b> Do you agree with our proposed remedies that would be specific to BT’s provision of interconnection, accommodation and related services required to access WCT? These proposed remedies include: (i) a requirement not to unduly discriminate,</p>	<p>Confidential? – N</p>

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<p>(ii) a requirement to publish a Reference Offer, (iii) a requirement to notify changes to charges, and (iv) a requirement to publish certain quality of service information (supplemented by a direction about BT's provision of interconnection).</p>	
<p><b>Question 6.4:</b> Do you agree with the quality of service KPIs in relation to its provision of IP interconnection services that we are proposing BT should be required to publish?</p>	Confidential? – N
<p><b>Question 7.1:</b> Do you agree with our proposed regulatory reporting requirements on BT?</p>	Confidential? – N
<p><b>Question 8.1:</b> Do you agree with our proposed market definition in relation to 070 WCT?</p>	Confidential? – N Yes
<p><b>Question 8.2:</b> Do you agree with our provisional view that it is appropriate to identify the 070 WCT markets we have provisionally identified for the purpose of considering whether to make a market power determination, on the grounds they meet the three-criteria test set out in section 79(2B) of the Act?</p>	Confidential? – N Yes
<p><b>Question 8.3:</b> Do you agree with our provisional conclusion that each 070 termination provider has SMP in the market served by that provider?</p>	Confidential? – N Yes
<p><b>Question 8.4:</b> Do you agree with the competition concerns arising from SMP in the 070 WCT markets that we have provisionally identified?</p>	Confidential? – N Yes

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<p><b>Question 8.5:</b> Do you agree with our proposed charge control on 070 WCT?</p>	<p>Confidential? – N</p> <p>Yes</p>
<p><b>Question 8.6:</b> Do you have any initial view about the ongoing effectiveness of the service designation of 070 numbers as personal numbers and, more generally, on the future of the 070 number range?</p>	<p>Confidential? – N</p> <p>The Personal Numbers definition remains effective.</p> <p>There has been a drop in the numbers of calls to 07 numbers mainly because it is very difficult to make them work economically within the current charge control. That said we do understand that there is a market for them, particularly where people under some sort of threat need to conceal their identity and/or location</p>
<p><b>Question 9.1:</b> Do you agree with our proposal to revoke the End-to-End Connectivity Condition with effect from 1 April 2026?</p>	<p>Confidential? – N</p> <p>No</p> <p>There are a number of reasons why we feel it is not yet appropriate to revoke the End-to-End Connectivity Condition. We agree there have been significant changes to the wholesale voice markets but where relations between major Operators and SMEs are concerned some things are unchanged and in many cases are worse.</p> <p>Certain large Operators block access for their customers to entire number ranges, sometimes even refusing to put them in data. This is despite their being reminded of their obligations under GC B4.2. This has been raised with OFCOM, they say it's a commercial issue, when raised it at the Standard Internet Protocol Agreement review, they said it was a regulatory issue, leaving SMEs with nowhere to go without resorting to expensive legal representation. As a result, consumers are deprived of services and SMEs of revenue.</p> <p>There are other providers offering transit services but not enough to encourage true competition in the market. Using anyone other than BT is usually more expensive because anyone interconnecting with them has to pay their costs and margins plus, if the far end provider is interconnected with another Transit Provider, the other Transit Provider's charges.</p>

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	<p>Hosting is suggested as an alternative but again, while there may be lower initial set up costs, there will be additional ongoing costs, the Hosting Provider's charges and the transit charges. That said, set up costs are not so much of a consideration now due to the use of VOIP.</p> <p>The consultation states:</p> <p>"could threaten to block their subscribers from calling customers of smaller providers." And:</p> <p>"In our view, the risk of such outcomes is now limited"</p> <p>In the experience of the smaller providers, as stated above this activity is more prevalent now than it was, albeit on number ranges than all the providers numbers and not as a bargaining chip for different rates due to the presence of the reference offer.</p> <p>We note the comment about the reduced costs of Interconnection under VOIP but Transit charges have not seen any reduction, they have increased significantly since deregulation of the charges.</p>
<p><b>Question A8.1:</b> Do you agree with our assessment of the likely impact of our proposals?</p>	<p>Confidential? – N</p> <p>No.</p> <p>OFCOM is placing a reliance on the safeguards embodied in GCs. Certain large providers have shown a willingness to ignore some GCs and there is no reason to expect this to be any different in the future.</p> <p>9.52 says:</p> <p>"However, we consider the associated risks to end-to-end connectivity to be relatively small because:</p> <p>a) As discussed above, our initial view is that the risk of interconnection failure has reduced since the introduction of the End-to-End Connectivity Condition in 2006.</p> <p>b) We have not seen evidence to suggest that new entrants or small providers are failing to obtain end-to-end connectivity from large providers other than BT. "</p> <p>There has been Interconnection failure by some large providers not putting number ranges in data or blocking ranges in use, barring their customers from accessing all numbers. This is a growing problem. This issue has been</p>

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	<p>raised with OFCOM but the issue was seen by OFCOM as a commercial issue and too low a priority.</p> <p>SMP Conditions and associated charge controls have prevented the application of uneconomic Termination rates but Transit charges are not regulated and have been subject to significant prices rises, even though costs have decreased, in the same way that unregulated Access charges have increased. There is nothing to prevent these charges rising to uneconomic levels.</p>
<p><b>Question A8.2:</b> Do you agree with our assessment of the potential impacts on specific groups of persons?</p>	<p>Confidential? – N</p>
<p><b>Question A8.3:</b> Do you agree with our assessment of the potential impacts on the Welsh language?</p>	<p>Confidential? – N</p>

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