

8<sup>th</sup> October 2025

## **Response to “Reviews of Call Termination Markets and End-to-End Connectivity Condition”**

Magrathea welcomes the opportunity to respond to this consultation, which follows five years after the previous wholesale voice market review. A period marked by significant progress towards an all-IP network and the retirement of many legacy wholesale agreements.

We appreciate Ofcom’s continued engagement with industry stakeholders through informal discussions, and agree that only minimal change is necessary at this point. The previous market review provided a much needed period of stability during an intense phase of regulatory and operational change, including the implementation of TSRs, switching reforms and updated CLI rules.

### **Questions 4.1 to Question 5.2**

We agree with Ofcom’s proposals. Maintaining the existing charge control offers continuity and certainty. A full review at this stage would likely be costly resource intensive, with limited benefit to the market or the consumer.

### **Question 5.5**

Reciprocity conditions are now widely adopted, and their removal could risk re-introducing the confusion and instability seen at the time of their introduction. That said, they remain complex and inconsistently applied. We urge Ofcom to simplify and standardise the administration of these conditions.

We reiterate our previous requests for detailed best practice guidance to promote consistent implementation of surcharges and related charging.

### **Question 6.1 to Question 7.1**

We agree with the proposals.

### **Question 8.1 to Question 8.5**

We agree with the proposals.

## Question 8.6

We believe that genuine 070 usage is now so limited that the time is right to redesignate these numbers and return them to the general numbering pool. The simplest solution would be to amend mobile designation to 07x.

However, this is also an opportunity to take a broader view of National Numbering Plan and consider how numbering should evolve. With the growth of cloud-based services and IOT services, there is a strong case for reserving a specific sub-set of numbers for these purposes – supporting advanced fraud management, tariff management and regulatory oversight.

## Question 9.1

We have some reservations about Ofcom's assumptions that commercial incentive alone are sufficient to secure end to end connectivity. This does not fully reflect the current interconnect landscape.

The existing obligations placed on BT are crucial in keeping the market accessible to smaller providers and in preventing larger operators from using their position in the market to restrict access. While the General Conditions require all networks to negotiate interconnect and provide access to all numbers, in practice, significant delays and barriers remain, even with IP interconnect.

We are also concerned that the removal of current end to end connectivity requirements could reduce transit solutions, a particular concern for smaller providers trying to enter the market.

Additionally, with the closure of TDM networks imminent, a backlog of interconnect requests is inevitable as operators transition at different speeds. Clear guidance on 'reasonable timescales' will be essential to manage the final stages of migration.

If Ofcom decides to remove the current conditions on BT, we strongly recommend extending equivalent obligations across all providers. By ensuring that any network offering call termination must do so for all calls, and reinforcing expectations around interconnect timescales and accessibility.

We remain available to discuss any of these points further if Ofcom should wish to do so.

Yours faithfully,



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