



Consultation response form

Please complete this form in full and return to CallsReview2026@ofcom.org.uk.

Consultation title	Reviews of Call Termination Markets and End-to-End Connectivity Condition
Full name	Alan Partington
Contact phone number	
Representing (delete as appropriate)	Organisation
Organisation name	Telecom2 Ltd
Email address	

Other Operators represented by this response are:

Abraham Keinan of Swiftnet Ltd

Mark Birkett, of Square One Communications Ltd

Neil Penny, Individual

Paul Turner of Core Telecom Ltd

Mike Charlesworth of Mediatel Ltd

Gary Corbett of Dynamic Mobile Billing

Emma Knight of The Number UK Ltd

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](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Nothing
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Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes

Your response

Question	Your response
Question 4.1: Do you agree with our proposed market definition in relation to WCT?	Confidential? – N No. We believe that calls to non geographic numbers should be included, they may have some differences to Geographic calls but the underlying principles of Inter-connection and call termination still apply.
Question 4.2: Do you agree with our proposed market definition in relation to MCT?	Confidential? – N Yes
Question 4.3: 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?	Confidential? – N Yes but include termination of calls to Non-Geographic numbers.
Question 4.4: Do you agree with our provisional conclusion that each provider of WCT has SMP in the market served by that provider?	Confidential? – N Yes
Question 4.5: Do you agree with our provisional conclusion that each provider of MCT has SMP in the market served by that provider?	Confidential? – N Yes

Question	Your response
<p>Question 4.6: 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>Question 5.1: 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>
<p>Question 5.2: Do you agree with our proposed charge control on WCT?</p>	<p>Confidential? – N Yes for Geographic calls</p>
<p>Question 5.3: Do you agree with our proposal to maintain a network access obligation on all MCT providers?</p>	<p>Confidential? – N Yes</p>
<p>Question 5.4: Do you agree with our proposed charge control on MCT?</p>	<p>Confidential? – N Yes</p>
<p>Question 5.5: 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>Question 6.1: 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>

Question	Your response
<p>Question 6.2: Do you agree with our proposal to update Ofcom’s guidance about BT’s interconnection and accommodation charges?</p>	<p>Confidential? – N Yes</p>
<p>Question 6.3: 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, (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>Confidential? – N Yes but we believe the obligations to not to unduly discriminate, to publish a Reference Offer, to notify changes to charges, should apply to all Operators offering Transit Services.</p>
<p>Question 6.4: 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>	<p>Confidential? – N Yes</p>
<p>Question 7.1: Do you agree with our proposed regulatory reporting requirements on BT?</p>	<p>Confidential? – N Yes</p>
<p>Question 8.1: Do you agree with our proposed market definition in relation to 070 WCT?</p>	<p>Confidential? – N Yes</p>
<p>Question 8.2: 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>	<p>Confidential? – N Yes</p>

Question	Your response
<p>Question 8.3: Do you agree with our provisional conclusion that each 070 termination provider has SMP in the market served by that provider?</p>	<p>Confidential? – N</p> <p>Yes</p>
<p>Question 8.4: Do you agree with the competition concerns arising from SMP in the 070 WCT markets that we have provisionally identified?</p>	<p>Confidential? – N</p> <p>Yes</p>
<p>Question 8.5: Do you agree with our proposed charge control on 070 WCT?</p>	<p>Confidential? – N</p> <p>Yes</p>
<p>Question 8.6: 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 in large part 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>Question 9.1: 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. 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 Small Operators are concerned some things are unchanged and in some 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. We have raised this with OFCOM, they say it's a commercial issue, we raised it at the Standard Internet Protocol Agreement review, they said it was a regulatory issue, leaving Small Providers with nowhere to go without resorting to expensive legal</p>

Question	Your response
	<p>representation. So consumers are deprived of services and Small Providers of revenue.</p> <p>There are other providers of 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> <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, meaning that hosting is less attractive unless the new Operator is unable to obtain interconnect.</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 provider's numbers and not as a bargaining chip for different rates due to the presence of the reference offer.</p> <p>What will happen if a Terminating Provider is unable to or is struggling to obtain Interconnection, would OFCOM be willing to designate a Transit Provider?</p> <p>There is a concern amongst Small Operators that if the End-to-End Connectivity Condition is revoked, existing Interconnection Agreements could be terminated. Nothing in the consultation gives comfort in this area. Can OFCOM comment on this possible situation? Would they compel the Transit provider to continue Interconnection?</p> <p>We note the comment about the reduced costs of Interconnection under VOIP but Transit charges have not</p>

Question	Your response
	<p>seen any reduction, they have increased significantly since deregulation of the charges.</p> <p>The Number UK Ltd - We support the relevant parts of the T2 submission, relating to the proposal to revoke the end to end connectivity condition, and recognise that explicit evidence of competition, pricing and regulatory compliance issues must be provided to Ofcom by industry. We also recognise that instances of this nature may not equally affect the full range of service providers in the sector but that the risk and impacts must be taken into account and mitigated effectively.</p>
<p>Question A8.1: 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 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</p>

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	<p>charges have increased. There is nothing to prevent these charges rising to uneconomic levels.</p> <p>The Number UK Ltd - We support the relevant parts of the T2 submission, relating to the proposal to revoke the end to end connectivity condition, and recognise that explicit evidence of competition, pricing and regulatory compliance issues must be provided to Ofcom by industry. We also recognise that instances of this nature may not equally affect the full range of service providers in the sector but that the risk and impacts must be taken into account and mitigated effectively.</p>
<p>Question A8.2: Do you agree with our assessment of the potential impacts on specific groups of persons?</p>	<p>Confidential? – N</p> <p>Yes</p>
<p>Question A8.3: Do you agree with our assessment of the potential impacts on the Welsh language?</p>	<p>Confidential? – N</p> <p>rydym yn cytuno</p>

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