

Consultation response form

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

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|---|---|
| Consultation title | Reviews of Call Termination Markets and End-to-End Connectivity Condition |
| Full name | |
| Contact phone number | |
| Representing (delete as appropriate) | Organization |
| Organisation name | Twilio Ireland Limited |
| Email address | |

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](#).

| | |
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| 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 |
| 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? | No |



Your response

| Question | Your response |
|---|--|
| <p>Question 4.1: Do you agree with our proposed market definition in relation to WCT?</p> | <p>Confidential? – N</p> <p>Twilio has no further comments on this question at this stage.</p> |
| <p>Question 4.2: Do you agree with our proposed market definition in relation to MCT?</p> | <p>Confidential? – N</p> <p>Twilio has no further comments on this question at this stage.</p> |
| <p>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?</p> | <p>Confidential? – N</p> <p>Twilio has no further comments on this question at this stage.</p> |
| <p>Question 4.4: 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</p> <p>Twilio has no further comments on this question at this stage.</p> |
| <p>Question 4.5: 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</p> <p>Twilio has no further comments on this question at this stage.</p> |
| <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</p> <p>Twilio has no further comments on this question at this stage.</p> |

| Question | Your response |
|---|--------------------------|
| <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</p> |
| <p>Yes, we support continuing network access obligations and proportionate additional remedies on BT (non-discrimination, transparency, and regulatory financial reporting) given BT’s scale and importance as an interconnection partner. These measures should remain tightly focused on enabling practical interconnection while retiring conditions tied to legacy technologies, as Ofcom proposes.</p> | |
| <p>Question 5.2: Do you agree with our proposed charge control on WCT?</p> | <p>Confidential? – N</p> |
| <p>Yes, we support the direction of travel: keeping targeted regulation where termination remains a bottleneck; simplifying legacy obligations; and giving clarity well ahead of April 2026. However, we suggest practical refinements to Ofcom’s proposal to improve predictability and day-to-day implementation.</p> <p>Regulatory certainty Ofcom’s five-year outlook and intention to simplify rules give a solid base for planning. To strengthen certainty, we suggest one further element linked to the proposals on charge control design: build in a mid-review stocktake focused narrowly on pricing.</p> <p>The purpose would be to “take stock” once during the control—only if needed—and adjust the cap if economic conditions shift in ways that materially and durably change efficient costs.</p> <p>Given Ofcom proposes to hold caps in nominal terms through March 2031, a single evidence-led checkpoint would guard against the risk that unforeseen cost movements over several years lead to misalignment between the cap and efficient provision, without reopening the broader policy package. This complements Ofcom’s objectives of stability and administrative simplicity.</p> <p>To make this predictable, the statement could set out: when the checkpoint could be triggered; the objective tests for change (for example, clearly defined cost or</p> | |

Question

Your response

inflation thresholds); and the narrow scope of any adjustment. That keeps the framework stable for most scenarios while recognizing today's more volatile backdrop.

Price caps and inflation

Ofcom proposes to maintain today's nominal caps for fixed and mobile termination for the whole period, citing simplicity and billing practicality. We think the cap should move with a transparent inflation index so it stays aligned with efficient, forward-looking costs over five years.

Termination depends on inputs—power, space and cooling, software assurance, cyber security, fraud controls, specialized engineering—the costs of which do not stand still across a control of this length. Indexing the cap to a standard measure of inflation provides a rule-based, predictable way to reflect these movements in costs and helps sustain quality and resilience while operators continue migrating to all-IP interconnection. In short, an inflation-adjusted cap achieves Ofcom's consumer protection aim without eroding viability if costs rise materially during the control. If Ofcom prefers to keep nominal caps, the mid-review stocktake above becomes more important.

What the termination cap includes—and what it does not

Since caps were first introduced, networks and interconnection have shifted decisively toward IP, and security and scam-prevention expectations have increased. Alongside the proposed remedy package (caps, access, and BT transparency/financial reporting), it would help if Ofcom publishes clear guidance on the scope of "termination-related" costs under today's technology mix. We suggest three elements, with short worked examples:

First, a concise definition of termination in the IP era. This should cover the functions directly and causally needed to accept, convey and complete an incoming call on the terminating network (including necessary signaling and media handling to maintain call integrity). This aligns with Ofcom's focus on wholesale termination as the essential input that enables universal reachability.

Second, clarity on associated facilities that are integral to termination. Where elements such as session border control, routing, lawful intercept enablement, and targeted fraud-mitigation are specifically and proportionately attributable to the act of terminating the call, they should be inside the scope of the cap. This is consistent with Ofcom's proposal to continue access obligations and, for BT, additional transparency/financial reporting on WCT and associated facilities.

Third, explicit exclusions. Costs not causally driven by termination should remain outside the cap and priced separately on reasonable terms—e.g., origination and transit, retail support, general marketing and acquisition costs, optional or

| Question | Your response |
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| <p>value-added features sought by counterparties, and network changes not necessary for termination. This boundary-setting will reduce disputes and ease billing.</p> <p>Because assets and processes are often shared, it would also help to set practical rules for cost allocation (direct attribution where feasible; reasonable apportionment where not; and sensible materiality thresholds).</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</p> <p>Twilio has no further comments on this question at this stage.</p> |
| <p>Question 5.4: Do you agree with our proposed charge control on MCT?</p> | <p>Confidential? – N</p> <p>Twilio has no further comments on this question at this stage.</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</p> <p>Twilio has no further comments on this question at this stage.</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</p> <p>Twilio has no further comments on this question at this stage.</p> |
| <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</p> <p>Twilio has no further comments on this question at this stage.</p> |

| Question | Your response |
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| <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 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</p> <p>Twilio has no further comments on this question at this stage.</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</p> <p>Twilio has no further comments on this question at this stage.</p> |
| <p>Question 7.1: Do you agree with our proposed regulatory reporting requirements on BT?</p> | <p>Confidential? – N</p> <p>Twilio has no further comments on this question at this stage.</p> |
| <p>Question 8.1: Do you agree with our proposed market definition in relation to 070 WCT?</p> | <p>Confidential? – N</p> <p>Twilio has no further comments on this question at this stage.</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</p> | <p>Confidential? – N</p> <p>Twilio has no further comments on this question at this stage.</p> |

| Question | Your response |
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| three-criteria test set out in section 79(2B) of the Act? | |
| Question 8.3: Do you agree with our provisional conclusion that each 070 termination provider has SMP in the market served by that provider? | Confidential? – N Twilio has no further comments on this question at this stage. |
| Question 8.4: Do you agree with the competition concerns arising from SMP in the 070 WCT markets that we have provisionally identified? | Confidential? – N Twilio has no further comments on this question at this stage. |
| Question 8.5: Do you agree with our proposed charge control on 070 WCT? | Confidential? – N Twilio has no further comments on this question at this stage. |
| 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? | Confidential? – N Twilio has no further comments on this question at this stage. |
| Question 9.1: Do you agree with our proposal to revoke the End-to-End Connectivity Condition with effect from 1 April 2026? | Confidential? – N Twilio has no further comments on this question at this stage. |
| Question A8.1: Do you agree with our assessment of the likely impact of our proposals? | Confidential? – N Twilio has no further comments on this question at this stage. |
| Question A8.2: Do you agree with our assessment of the potential impacts on specific groups of persons? | Confidential? – N Twilio has no further comments on this question at this stage. |

| Question | Your response |
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| Question A8.3: Do you agree with our assessment of the potential impacts on the Welsh language? | Confidential? – N Twilio has no further comments on this question at this stage. |

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