

**Response to Ofcom Reviews of Call Termination Markets  
and End-to-End Connectivity Condition**

10 October 2025



## **About UKCTA**

1. This submission is made by the UK Competitive Telecommunications Association (UKCTA). UKCTA is a trade association promoting the interests of fixed line telecommunications and broadband companies competing against BT as well as each other, in the residential and business markets. Its role is to develop and promote the interest of its members to Ofcom and the Government. Details of membership can be found at [www.ukcta.org.uk](http://www.ukcta.org.uk). Its members serve millions of UK consumers.

## **Summary**

2. UKCTA is broadly supportive of Ofcom's proposals in respect of both WCT and MCT, 070 call termination and in respect of Ofcom's proposal to lift the End-to-End Connectivity Condition, although we do have some concerns with each and we will focus on these in this submission.

## **Market Definitions**

3. Ofcom recognise the substitutional effect that Online Communication Services (OCS) are having on landline and mobile call volumes with the migration of large and growing amounts of traffic to those various platforms. Whilst Ofcom briefly discuss OCS, it proposes to exclude them from the Market Definitions for WCT and MCT principally, it seems, as they individually provide an isolated island devoid of the ability to support connectivity between each other or more traditional landline and mobile services.
4. Whilst at this stage we do not object to Ofcom proceeding on that basis in this review, we are of the view that this approach is not sustainable. These services are having a huge predatory impact on E164 based calling services. The use of paid-for services offered on various OCS platforms is quickly building. Fraudsters are now attempting to lure their victims away from their phone services onto these platforms where they attempt to perpetrate fraud by exploiting the weaker protections in place there. With the launch of 999 BSL in 2022, we

are on the cusp of providing the useful ability for 999 calls to exploit multi-media functions which are already available on OCS. The distinction in the mind of the consumer between all these alternative communication platforms is breaking down and this needs to be recognised by Ofcom. A time will come sooner rather than later when it will be in the public interest for the isolation between these platforms to be removed.

5. We would encourage Ofcom to publicly set a timetable for considering in depth these matters relating to OCS.

### **End-to-End Connectivity Obligation**

6. UKCTA cautiously welcome Ofcom's proposal to remove this obligation upon BT, although we do have some serious concerns about the potential negative consequences not contemplated by Ofcom. BT has over recent years cited this obligation as the basis for enabling number of asymmetries in the SIA (Standard Interconnect Agreement – relating to BT's TDM interconnect services) and more recently the SIPIA. As Ofcom is aware, UKCTA members have not agreed with BT that such constraints exist, but it is on this basis that we accept Ofcom's proposal to lift the obligation.
7. Whilst it is true that larger CPs have built out their connectivity significantly since 2006 such that much of the call traffic between them bypasses BT, Ofcom appears not to have considered a number of call scenarios where BT remains, and will remain for the foreseeable future, central to connectivity; principally geographic number portability and number portability transit.
8. With its history as incumbent, BT still has the greatest number of exported geographic numbers compared to other number range holders, and in the UK onward routing is still the prevalent means by which connectivity is achieved to those who port their numbers to alternative providers. This means there remains what we expect to be a very significant proportion of the traffic entering BT's

network from other CPs which has to be onward routed to third party CPs who have imported the relevant BT numbers.

9. Ofcom recognises that there are a large number of smaller CPs who connect only to BT, and considers that the relatively lower costs of interconnecting at IP and the consequent risk of bypass should act as a commercial constraint on BT's pricing and other behaviours. In the case of number portability, currently, BT is the only provider of porting transit services. Where two CPs enter into an agreement to allow numbers to be ported between them without having a direct interconnect, BT provides a transit service to connect onward routed calls from the Donor Operator to the Recipient Operator.
10. These particular scenarios make bypassing BT *more* difficult and would provide an unconstrained BT with the ability to behave in an exploitative fashion. It is for this reason that UKCTA remains cautious about Ofcom's proposal to lift the end-to-end-connectivity obligation without placing some safety precautions upon BT or imposing some specific reporting requirements to ensure that CPs are not disadvantaged over BT through an unwarranted increase in input costs.

#### **Findings of SMP in WCT and MCT**

11. UKCTA are broadly supportive of Ofcom's findings and justifications.

#### **Proposal to maintain Network Access obligation on all WCT providers**

12. UKCTA are broadly supportive of Ofcom's findings and justifications.

#### **Proposal to impose additional Network Access obligations on BT**

13. UKCTA is very supportive of Ofcom's proposals to impose additional specific Network Access obligations upon BT and suggest that these are long overdue. In its 2021 Statement, Ofcom imposed on BT for the first time an obligation to publish a Reference Offer for its IP Interconnect service. BT duly published its Reference Offer, the BT Standard IP Interconnect Agreement (SIPIA) on 1 October 2021 without any prior consultation with other CPs. UKCTA members

identified a number of issues with BT's new Reference Offer where they felt variously that certain matters lacked adequate clarity or detail and that unwarranted asymmetries in respect of obligations and rights, all in favour of BT, were included.

14. BT proved reluctant and slow to negotiate at every stage on these issues, and on 3 March 2025 a number of CPs submitted a Dispute to Ofcom for resolution with respect to a number of the more critical matters where BT had refused to accommodate CP concerns. BT argued that the matters raised in the dispute were more suitably addressed by Ofcom in the forthcoming WCT market review and offered the disputing parties the opportunity to continue negotiating the issues in the ongoing BT-run General Review (which had by then subsumed the UKCTA-based negotiations).
15. On 6 May 2025, Ofcom decided that it was not obliged to handle the dispute and that, accordingly, it would not do so. The disputing CPs renewed their negotiation efforts within the General Review and on 18 July 2025, BT intimated in a General Review meeting that it was prepared to make a number of concessions in respect of the disputed matters. BT has now scheduled the next meeting of the General Review to be held on 24 October 2025, and in the interim has not progressed any of the matters it said it would concede.
16. We rehearse this timeline to underscore a long-held perception amongst our members that BT, absent direct regulatory pressure, continues to assert its position within the market to its exclusive benefit by being slow to engage, slow to negotiate, intransigent and slow to deliver on its promises. Therefore, UKCTA welcome the additional Network Access obligations Ofcom proposes to impose upon BT and especially those incremental to those imposed in 2021 which go some way to addressing some of the issues previously raised by UKCTA where BT has refused or has proved slow in negotiating.
17. In particular, we are pleased that Ofcom proposes to require BT to include conditions relating to maintenance and quality within its Reference Offer, and

information relating to technical interfaces and points of interconnection.

UKCTA has been attempting since June 2023 to achieve the former, and since February 2023 with respect to the latter.

18. UKCTA also welcomes Ofcom's proposed direction that BT separate out within the BT SIPIA those elements relating to its Reference Offer and those elements that relate solely to commercial propositions, and to require BT to make it possible for CPs to contract under the SIPIA for the Reference Offer services alone. This could prove a valuable lever for CPs in negotiating away any remaining asymmetries in the BT SIPIA agreement.

#### **Proposal to Maintain WCT & MCT Charge Controls**

19. UKCTA agrees with Ofcom's proposal to not update the data within its cost models for this iteration of WCT and MCT charge controls. However, we *profoundly disagree* with Ofcom's proposed decision to change the charge controls such that they no longer allow for inflation and instead impose a single price cap for each of WCT and MCT to endure unchanged for five years. This could lead to a very real prospect that actual LRIC costs of providing WCT and MCT could be higher than the allowable charges. As an economic regulator, we expect Ofcom to take evidence-based decisions, in particular, when departing from its own precedent. In this instance, Ofcom expressed assertions that guided its proposals, yet did not validate these assertions based on analysis and evidence.

#### **Reciprocity Condition for the Termination of International Calls**

20. UKCTA note that the current Reciprocity Condition appears to have had some success in bringing down some of the previously high rates charged by providers in certain countries and is therefore broadly supportive of Ofcom's proposal to continue with the same regime.
21. Ofcom propose to bring UK roaming traffic (i.e., calls made over UK networks from non-UK mobile phones) into scope of the Reciprocity Condition. As Ofcom explains there have been concerns about whether such traffic was previously in

scope or not, and this has presented implementation issues which, for some CPs, have endured. We see Ofcom's proposal in this respect to be a clarification that better explains how the Reciprocity Condition should be implemented in respect to roaming traffic and, in doing so, resolves some historical differences in understanding and implementation difficulties across both UKCTA members and the wider industry. Of course, as the volume of roaming traffic generated within the UK utilising VoLTE increases, the relevance or need for this particular piece of guidance in respect of the reciprocity condition diminishes as the traffic does not then directly touch the UK roaming partner's call server but instead is carried over a data path and routed by the overseas provider's network.

22. UKCTA also welcomes the clarification with respect to the imposition of surcharges for minor CLI formatting errors. This has proved the subject of protracted and very costly disputes with BT in the past and we are pleased that Ofcom proposes to close the door on the possibility of such minor discrepancies being subject to financial penalties providing further significant windfalls to BT.

### **Proposal to Update Guidance about BT's Interconnect and Accommodation Charges**

23. UKCTA is broadly supportive of Ofcom's proposals and have no detailed comments to make in this regard.

### **Proposed remedies upon BT in the Provision of Interconnection, Accommodation and related Services to Access WCT**

24. UKCTA strongly supports Ofcom's proposals. As set out above, BT's behaviours over the last four years, including in recent months, demonstrate a desire to trade asymmetrically, to act opaquely, and be unconcerned about service issues, and we feel the additional proposed obligations are entirely warranted.

## **BT KPIs**

25. In setting out proposed KPIs for BT, Ofcom does not propose to set any benchmarks, nor a roadmap for establishing these, and this is a significant concern to UKCTA members.
26. In IP interconnect, the biggest ‘tails’ in term of repair mostly relate to complex faults such as call routing failures, signalling failures and individual in-service number portability failures, especially where BT is providing a transit service. Such issues can take weeks, sometimes months to fully resolve and consume an inordinate amount of management time. UKCTA would very much like to see a KPI imposed that monitors repair times for such issues.

## **Proposed BT Regulatory Reporting Requirements**

27. UKCTA broadly agree with Ofcom’s proposals although we do have one concern that predates the current Market Review. BT is currently under an obligation, which Ofcom propose to maintain, that when it self-provides WCT it does so on the basis of its Reference Offer, and that in self-providing should it vary from its Reference Offer, it makes those variances available to other providers. It is unclear to UKCTA how Ofcom has historically monitored BT’s compliance with this obligation. It is one thing to review the WCT rate BT charges to itself internally but quite another to monitor the wider aspects of providing itself with WCT, such as forecasting, ancillary charges etc. Our members have over the last 10 years faced steep increases in the charges for calls to BT’s PSAP1 facility with no transparency as to the fairness and reasonableness of those charges – which does not sit well with BT’s now monopolistic position with respect to this traffic.
28. UKCTA would very much like to see these issues addressed through the Reporting Requirements being imposed upon BT.
29. Whilst considering Regulatory Reporting we would draw Ofcom’s attention to its 2013 Statement “GC4 and the performance of emergency call handling agents”, and in particular the requirement on BT to not only audit its provision of PSAP1

for calls to the emergency authorities, but also to share the reports from those audits with CPs so that they can fulfil their regulatory obligations (which now lie in GC A3.2). BT has yet to publish any such reports, despite being reminded by UKCTA on behalf of its members repeatedly since 11 December 2023. In considering that Instrument, UKCTA would ask Ofcom to conduct a wider review of the environment in which CPs are required to provide a resilient connectivity to the emergency authorities for 999 calls. The environment is very different from that which existed in 2013 with BT now providing the sole PSAP1 facility (with no transparency in the charges it imposes). UKCTA suggest a thorough review of the obligations imposed under GC A3.2 and how these are best discharged end-to-end, factoring all the learning that has accumulated over the last decade.

### **070 Call Termination**

30. UKCTA is very supportive of Ofcom's proposal to maintain to current market definitions and charge controls. The suggestion that Ofcom could withdraw and repurpose the 070 number range has been made before, and we would suggest it is now overdue. With the controls previously put in place by Ofcom and as Ofcom notes in its consultation document, call volumes have dropped dramatically and, we would suggest, so have reported instances of Artificial Inflation of Traffic. We would suggest that the remaining legitimate use-cases fulfilled through 070 personal numbering could now be accommodated by using number ranges allocated for normal mobile use with little impact or incremental risk to calling consumers.

### **DSIT Statement of Strategic Priorities (SSP)**

31. UKCTA notes that Ofcom says it will take the forthcoming revised SSP into account in coming to its final conclusions in this market review. Should the SSP speak into any of the areas considered in this review, which we recognise is not an expected outcome, we would expect Ofcom to conduct a further round of

limited consultation rather than setting a course as a response to the SSP which is distinctly different to that set out in its proposals here.

### **Additional closing comments**

32. In closing and drawing on some of the tensions and experiences set out above, recognising the changes and additions Ofcom is proposing BT should make to the SIPIA, UKCTA would ask that Ofcom attends meetings of the BT SIPIA General Review as an observer in the same way as the OTA attends certain meetings held between Industry and Openreach. Absent such a commitment, we can foresee a further period of instability and friction should BT impose changes without consultation. One should recognise that currently, the SIPIA underpins the CP services provided to BT as much it does BT services provided to CPs. We feel that such a precautionary measure on the part of Ofcom would also help maintain currency within Ofcom on the nature of voice interconnect and the issues that arise from time to time. Given the historic infrequency of the sessions, and short duration of each, it should not prove an onerous task and could deliver value to Ofcom beyond the implementation of the current market review.
33. We would also draw Ofcom's attention to the timescales for migration to IP Voice Interconnect. As Ofcom notes, Openreach has extended the closing date of its WLR portfolio to January 2027 and, as such, there are some services consumed by CPs based on WLR that continue to be handed over on TDM (Carrier Pre-Select and Wholesale Access). This means that in some instances CPs will struggle to close the final elements of their TDM interconnect by the end of Q1 2026 as Ofcom expects. In light of this we would encourage Ofcom to temper its expectations as to the closure of TDM interconnect by BT.

End