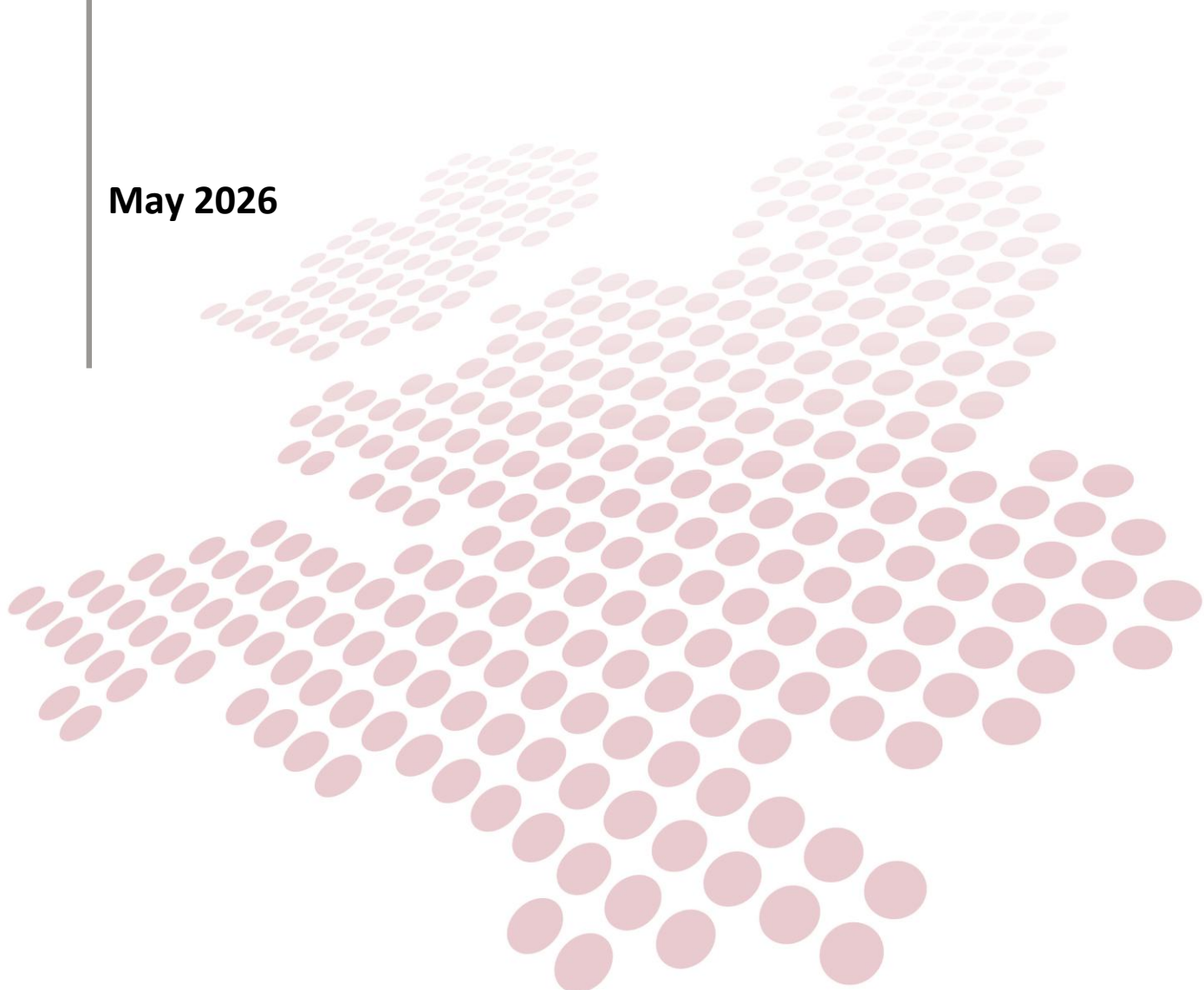


Response to Ofcom Consultation:

**Approach to the copper retirement second threshold
calculation – Telecoms Access Review 2026 - 2031**

May 2026



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. Its members serve millions of UK consumers.

Executive Summary

2. The UK Competitive Telecommunications Association (UKCTA) welcomes the opportunity to respond to Ofcom's consultation on the Approach to the copper retirement second threshold calculation.
3. Copper retirement is necessary and overdue. Running two networks is inefficient and ultimately raises costs for consumers. However, how copper retirement is completed matters as much as whether it happens. Decisions taken on the Second Threshold will shape consumer outcomes, market confidence and the credibility of the transition to full fibre.
4. UKCTA supports Ofcom's objective to progress copper retirement but cautions against decisions that are taken in isolation or that prioritise administrative simplicity over consumer fairness.
5. Copper retirement must follow a clear, end-to-end pathway. Setting a Second Threshold without clarity on the final stage risks uncertainty, repeated disruption for consumers and inefficient decision-making by providers.
6. Our preference is that availability must be judged at the premises level. Pricing flexibility or deregulation should only apply where a genuine, accessible ultrafast service is available to the individual home or business. Exchange-level averages are not sufficient.
7. Many customers have moved off legacy services in good faith onto interim products (such as SOGEA) ahead of full fibre availability. These customers should be protected from repeat disruption and punitive price signals in the medium term.

8. We would urge Ofcom to reject a Fixed Percentage exclusion model, or in the alternative materially strengthen with robust data points it to prevent arbitrary exclusion and consumer detriment.

Safeguarding Consumers

9. Copper retirement is essential. Maintaining parallel copper and fibre networks is inefficient and ultimately increases costs for consumers. However, the success of copper retirement depends on sequencing, safeguards and trust. Decisions taken on the Second Threshold will shape the final phase of the UK's transition to full fibre. If taken in isolation, they risk consumer harm, repeated disruption and loss of confidence in the migration process.
10. UKCTA supports Ofcom's objective to progress copper retirement, but believes the Second Threshold must sit within a clear, end-to-end framework that protects consumers and gives industry the certainty needed to plan effectively.
11. Copper retirement must operate as a complete pathway, not a single regulatory step. Providers and consumers need clarity on how the transition ends. Without visibility of the final stage, decisions taken today risk creating avoidable disruption later.
12. Pricing flexibility must be conditional on genuine, premises-level ultrafast availability. Exchange-level metrics are not sufficient. Consumers should not face higher prices unless a real, accessible alternative is available at their home or business.
13. Consumers who have already migrated should not be exposed to repeat disruption. Many customers have already moved off legacy copper products ahead of full fibre availability. Asking these customers to undergo further migrations or face price pressure risks confusion, dissatisfaction and loss of trust.
14. Exclusion mechanisms must prioritise fairness over administrative convenience. A framework that allows arbitrary exclusion risks leaving some consumers stranded on declining services with no clear route forward. Where a percentage is used, it must be fact based and reflect the situation on the ground.
15. UKCTA is concerned that exclusion mechanisms could be used in a way that distorts competition, particularly for business connectivity. If business premises are deliberately

excluded from copper retirement or pricing flexibility on the basis of administrative thresholds, this risks entrenching legacy wholesale leased line products where fibre alternatives could otherwise be made available. Such outcomes would undermine Ofcom's objectives of promoting effective competition and efficient investment, by allowing Openreach to continue serving captive business customers on higher-priced legacy services rather than enabling migration to FTTP-based solutions. Exclusions must therefore be tightly defined, evidence-based and premises-specific, and must not be used in a way that preserves legacy revenue streams at the expense of competitive fibre access for businesses.

Immediate Priorities

16. Confirm that pricing flexibility applies only where ultrafast services are available at the individual premises. This is essential to avoid consumer harm and ensure pricing signals are fair and proportionate.
17. Introduce safeguards for customers already migrated from legacy copper products. These customers have engaged in good faith with the transition and should not be penalised through repeat disruption or sudden pricing changes.
18. Maintain strong consumer protections as the Second Threshold is introduced. Lowering thresholds without adequate safeguards risks increasing confusion and disengagement, particularly among vulnerable consumers.

Medium-Term Reforms

19. Adopt a Defined Exclusions approach. Exclusions should be evidence-based, premises-specific and reviewable. This ensures that exclusions are genuinely exceptional and that every premise retains a credible pathway to fibre over time.
20. Set out the sequencing of the remaining stages of copper retirement. Early clarity on the final withdrawal of copper will allow providers to plan migrations efficiently and communicate clearly with customers.

Longer-Term Market Considerations

21. Wholesale deregulation, copper withdrawal and consumer protection do not operate in isolation. If poorly sequenced, they risk creating:

- repeated customer migrations
- contract instability and churn
- and reduced confidence in the fibre transition

22. This would cut across wider policy objectives on affordability, transparency and digital inclusion. Copper retirement is one of the final major infrastructure transitions in UK telecoms. A clear, sequenced and consumer-centred framework will allow the UK to complete this transition once, properly, and without leaving communities behind.

End.