☐ Found it on another website
☐ Heard about it on TV or radio
☐ Read about it in a newspaper or magazine
☐ Heard about it at an event
☐ Somebody told me or shared it with me
☐ Other (please specify)

On 1 June 2026, Openreach notified several pricing offers.

We are inviting stakeholders to provide any initial views on the offers to assist us in forming a provisional view on:

- Where the offer notified to us is a Conditional offer, whether it raises competition concerns requiring ex ante intervention; and
- Where the offer notified to us is a Geographic offer, whether it raises competition concerns such that Openreach's application for consent to implement geographic pricing where this would be otherwise prohibited should or should not be granted.

Stakeholders may also wish to provide views on whether the offers raise concerns about low pricing in relation to Openreach's requirement for charges to be fair and reasonable and/or raise more general concerns about undue discrimination that is capable of harming competition.

Stakeholders are asked to respond by **19 June 2026**.

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

Comments

Please find below the FCS's response to your Call for Input relating to Openreach new pricing offers. Our response is non-confidential, and we are happy for it to appear on the Ofcom website. It would be very helpful if you could please acknowledge receipt of this response.

The FCS represents companies which provide professional communications solutions to business users. Our members deliver telecommunications services via mobile and fixed line telephony networks, broadband, satellite, wi-fi and business radio. Our members' customers range from SMEs, home-workers and micro-businesses up to the very largest private enterprises and public sector users. FCS is the largest trade organisation in the professional communications arena, representing the interests of circa 350 businesses which supply B2B services nationwide.

The FCS welcomes Ofcom's scrutiny of Openreach's pricing offers and is pleased to see the controls put in place by the Telecoms Access Review up and working.

The FCS welcomes special offers from Openreach that stimulate the market and help economic growth. However, it is important that the whole complex supply chain can equally benefit from any special offer, and the FCS has concerns whether this is the case with the current offers.

With the withdrawal of WLR and the rise of FTTP, the way smaller CPs and resellers consume products has changed. In the main, smaller CPs and resellers no longer buy directly from Openreach, but instead purchase from a wholesaler, such as BT Wholesale (BTW), or a wholesale customer of Openreach or BTW. This change to the market means that the concept of equivalence of input (EoI) which was a cornerstone of the Undertakings and then the Commitments and led to a vibrant reseller business market, has been diluted. Smaller CPs and resellers can only compete if wholesalers pass the special offer down through the supply chain. For example, there is nothing from a regulatory perspective that requires BTW to make available the Openreach special offer to its wholesale customers and without this requirement smaller CPs and resellers could be at a significant disadvantage.

The FCS believes that there should be a regulatory requirement on BT to ensure that the concept of EoI is not lost and that customers of BTW can compete on a level playing field with BT's retail arm. At a minimum, the FCS would welcome confirmation from BTW that they intend to fully pass-on any savings to its wholesale customers.

There could also be practical reasons why wholesalers may choose not to pass time limited special offers down the complex supply chain as there may be changes required to billing and order entry systems that cannot be implemented swiftly or in a cost-efficient way. The FCS is concerned that such practical concerns could prevent smaller CPs and resellers competing and that vertically integrated business providers of Openreach, such as BT Business, Sky Business and PXC will be able to take advantage of cheaper lines that are not just available to FCS members. It is imperative that Ofcom understands what wholesalers, particularly BTW, are able to provide to ensure that such offers do not just favour large Openreach customers.

The FCS would also like to understand how any rebates will be processed, as smaller CPs and resellers are disadvantaged if rebates are provided in arrears. Smaller providers are not able to manage cash-flow issues as easily as larger providers and this again can lead to a distortion of competition.