

Consultation response form

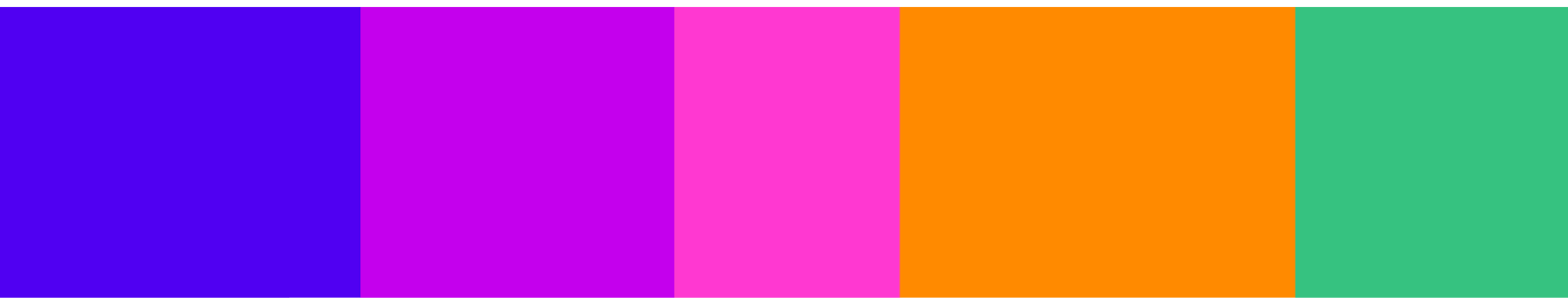
Please complete this form in full and return to tar2026consultation.responses@ofcom.org.uk

Consultation title	Further consultation on leased lines market analysis and various pricing issues - Telecoms Access Review 2026-31
Full name	
Contact phone number	
Representing (delete as appropriate)	Organisation
Organisation name	techUK
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](#).

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?	Yes



Your response

Question	Your response
<p>Question 3.1: Do you agree with our reasoning on the impact of consolidation? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – N</p> <p>Members hold differing views on the extent to which consolidation across the fibre sector should influence the assessment of competitive conditions in the leased line access market. Some members emphasise that leased lines and FTTP operate in fundamentally distinct markets with different deployment models, performance characteristics and customer requirements. They note that enterprise-grade leased lines rely on dedicated, resilient and highly interconnected networks capable of providing guaranteed bandwidth, symmetrical performance and enhanced security. On this view, consolidation among FTTP builders does not alter the dynamics of the leased-lines market and should not be considered indicative of future competitive constraint.</p> <p>Other members consider that consolidation can, in certain cases, accelerate the development of the scale, capability and service maturity needed to compete more broadly in business connectivity markets. These members point to the five-year duration of the review period, during which newly established or merged entities may expand network coverage, acquire operational capability or develop wholesale offerings that bring them closer to enterprise markets. They also note that the boundaries between delivery models are gradually evolving, including through the emergence of LL-equivalent services delivered over shared fibre platforms, and believe that the framework should retain sufficient flexibility to reflect such developments.</p> <p>We have received feedback from some members of a shared interest in ensuring that Ofcom’s approach does not pre-judge the competitive potential of the market over the full review period. If consolidation – members say - is defined too narrowly, there could a risk that the framework embeds a static view of competitive conditions and places significant weight on historic market positions that may not remain stable. Conversely, members also recognise that proximity to FTTP assets does not, in itself, equate to meaningful competition in enterprise-grade services, and that network scale, financial resilience, interconnection, service wrap and go-to-market capability will continue to play a central role in determining competitive outcomes.</p>

Question	Your response
	<p>Considering these differing perspectives, members agree that Ofcom should adopt an approach that is transparent, evidence-based and capable of reflecting material market developments over the lifecycle of the review.</p>
<p>Question 3.2: Do you agree with our revised proposals relating to the buffer distance? Do you have a view on the most appropriate value of the buffer distance? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – N</p> <p>Members hold a range of views on Ofcom’s proposal to increase the buffer distance used to determine whether competing networks are within reach of serving a given premise. While there is broad recognition that the current 50-metre threshold no longer fully reflects the role of PIA in enabling longer customer-specific network extensions, concerns remain about the extent to which a fixed distance can reliably capture the real-world drivers of build behaviour. Indeed, some members warn that reliance on distance thresholds risks overstating competition in some locations while understating it in others.</p> <p>Some members highlight that the number of leased-line network extensions has fallen materially in recent years, even as the overall market has grown and despite operators increasingly making use of both newly built duct and PIA infrastructure. These members argue that this decline suggests a reduced propensity to build out to new enterprise sites, reinforcing the view that physical proximity alone may overstate the competitive significance of nearby networks. They note that technical reach does not guarantee that a provider can or will serve an individual premise, particularly where there are constraints related to wayleaves, route complexity, build costs or limited commercial incentives.</p> <p>Other members underline that modern deployment models, including the use of shared-fibre platforms to deliver equivalent services, have expanded the feasible reach of some operators beyond what was typical in previous review periods. They also highlight evidence of operators undertaking network extensions well beyond 50 metres where commercially justified and argue that the modelling should reflect these evolving capabilities rather than relying exclusively on historic behaviours.</p> <p>Across these differing perspectives, there is agreement that an extended buffer distance should not, on its own, be treated as evidence of effective competition, nor should it replace a more holistic assessment of actual competitive conditions. Members also consider that any adjustment to the buffer dis-</p>

Question	Your response
	<p>tance must be supported by robust evidence and should be accompanied by clear visibility on how Ofcom intends to treat emerging LL-equivalent delivery models in the final framework.</p> <p>We welcome an approach that acknowledges the operational impact of PIA and evolving deployment practices, while also recognising the limits of a single-distance metric. Ensuring that the final market boundaries reflect both the practical realities of network extension behaviour and the broader commercial and technical context will be essential to producing a proportionate and accurate assessment of competition between 2026 and 2031.</p>
<p>Question 4.1: Do you agree with our revised approach to the application of discount rate when calculating the charge control for simplified lead-in duct?</p>	<p>techUK is not responding to this question.</p>
<p>Question 5.1: Do you agree with our revised proposals relating to charge controlling active LLA services in LLA Area 3 and dark fibre services in the LLA and IEC markets?</p>	<p>techUK is not responding to this question.</p>
<p>Question 6.1: Do you agree with our revised proposals relating to the estimation of Openreach sales product management costs within our dark fibre charge controls?</p>	<p>techUK is not responding to this question.</p>

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