

# Promoting competition and investment in fibre networks: Telecoms Access Review 2026–31

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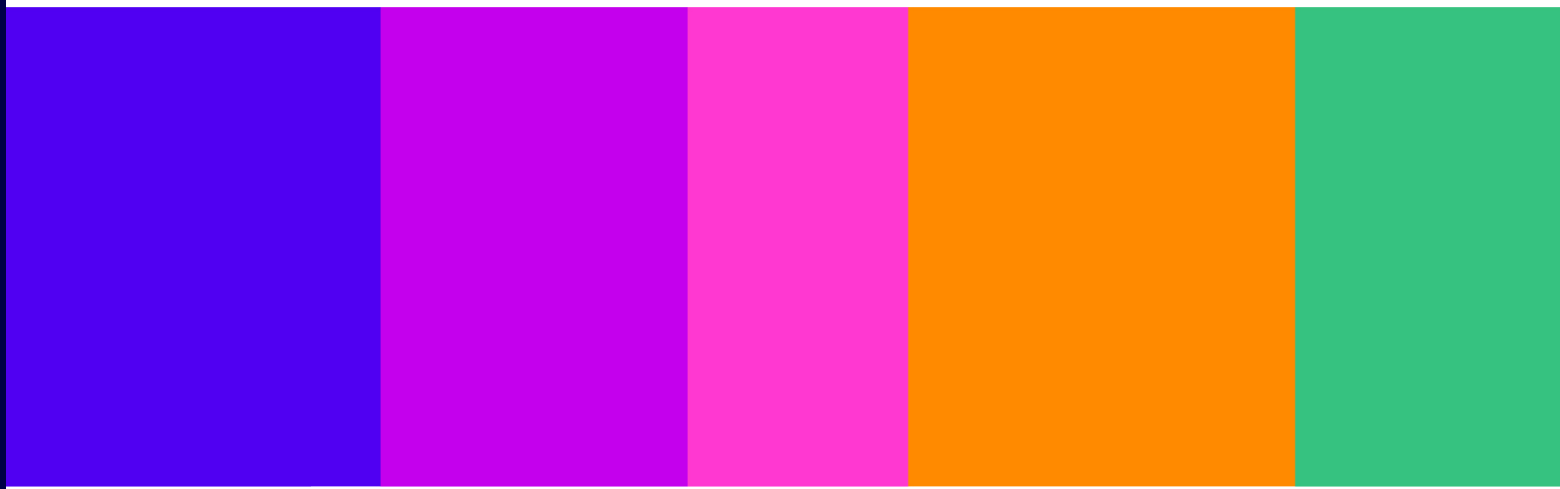
Volume 5: Quality of Service

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## Statement

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# 1. Overview

- 1.1 This volume sets out our decisions for regulating quality of service (QoS) in the physical infrastructure, wholesale local access (WLA)<sup>1</sup>, leased lines access (LLA)<sup>2</sup> and inter-exchange connectivity (IEC)<sup>3</sup> markets where we have determined BT has significant market power (SMP) as set out in Volume 2, and for a transitional period in the IEC BT+2 markets we have decided to deregulate in this review.<sup>4</sup>

## What we have decided – in brief

- To retain an SMP condition which requires BT to comply with any QoS standards, transparency and reporting requirements as Ofcom may direct in relation to each of the above markets where we have determined that BT has SMP.
- To give directions requiring BT to meet minimum QoS standards for certain network access products in WLA Area 3, WLA Area 2, LLA Area 3, LLA Area 2 and regulated IEC markets.
- To give directions requiring BT to provide specified service performance information in relation to certain network access products in WLA Area 3, WLA Area 2, LLA Area 3, LLA Area 2, HNR Area and IEC markets and to publish a subset of this information on its website.

- 1.2 In relation to minimum QoS standards for Openreach's fibre-to-the-cabinet (FTTC) and metallic path facility (MPF) network access products<sup>5</sup> in WLA Area 3 and WLA Area 2, we have decided to keep the existing obligations on Openreach to comply with minimum standards. However, over the 2026-31 review period, we expect volumes of copper-based broadband to fall as customers migrate to better and more reliable full-fibre broadband. We have therefore decided to take account of this change by no longer requiring Openreach to separately meet these standards in each of its seven management regions.<sup>6</sup> We have however decided that Openreach will still be required to report on its performance by management region as well as the UK as a whole to provide transparency of its performance.
- 1.3 We have decided to introduce new backstop minimum QoS standards on fibre-to-the-premises (FTTP) in WLA Area 3, as we do not consider that this area is likely to have the potential for material and sustainable network competition and so retail competition will remain reliant on access to Openreach's network. We have decided to use the same metrics which we have found effective for regulating legacy copper-based network access products but set at levels adjusted to the specifics of the product and past performance in the relevant geographic market (WLA Area 3). This will require Openreach's performance in

<sup>1</sup> WLA Area 2 and WLA Area 3.

<sup>2</sup> LLA Area 2, LLA Area 3 and High Network Reach Area (HNR Area).

<sup>3</sup> BT Only and BT+1 exchanges meaning those BT exchanges where there is either just one rival or no rivals present.

<sup>4</sup> i.e. excluding any BT+2 exchanges that have previously been deregulated.

<sup>5</sup> Unless expressed otherwise, in this volume references to FTTC include G.fast, SOGEA and SOGfast and references to MPF include SOTAP i.e. as defined in Direction 3 of the QoS Directions (Volume 7).

<sup>6</sup> The seven management regions are (1) East Anglia, (2) London and Southeast, (3) Northern England, (4) Northern Ireland, (5) Scotland, (6) Wales and Midlands and (7) Wessex.

installing and repairing FTTP to meet a minimum level in WLA Area 3. We have decided not to impose any QoS standards on FTTP in WLA Area 2, where we want to promote network competition. As network competition develops, it will increasingly drive QoS in WLA Area 2. We have decided to require Openreach to report on its performance in installing and repairing FTTP across both areas.

1.4 With regard to LLA Area 3, LLA Area 2 and IEC, we have decided to:

- retain existing minimum QoS standards on Openreach’s ethernet products<sup>7</sup> and dark fibre<sup>8</sup> products (with an adjustment to the upper percentile limit for provisions to reflect changing market conditions) and continue not to apply standards on WDM products<sup>9</sup>; and
- retain reporting obligations on all three product types.

1.5 We have also decided to continue to impose reporting obligations to monitor service performance in the HNR Area but not to set minimum QoS standards.

1.6 We have decided not to direct Openreach to comply with any QoS standards, transparency or reporting requirements in the physical infrastructure market. We recognise that Openreach’s performance and QoS when delivering PIA is critical. Existing voluntary metrics may need to evolve with the PIA product as it changes, or be expanded, to continue to enable effective monitoring and transparency. Were a performance issue to develop during the review period, Ofcom can consider whether to intervene by making appropriate directions.

1.7 Tables 1.1 and 1.2 below summarise the minimum QoS standards we have decided to set in each of the WLA, LLA and IEC markets.

**Table 1.1: WLA minimum QoS standards<sup>10</sup>**

Product	Region	Standard	Level
FTTC/MPF	WLA Area 2 and WLA Area 3 combined	Repair within 2 working days (SML1)	85%
		Repair within 1 working day (SML2)	
		Repair within 7 working days (SML1)	97%
		Repair within 6 working days (SML2)	
		Installations to be completed by the committed date	94%

<sup>7</sup> We define ‘relevant ethernet services’ in Direction 1 of the QoS Directions (Volume 7). In summary, these are Openreach’s products called ethernet access direct (EAD), ethernet backhaul direct (EBD) and cablelink.

<sup>8</sup> We define ‘dark fibre access’ in Direction 1 of the QoS Directions (Volume 7). In summary, this includes dark fibre network access products and cablelinks for both LLA and IEC markets; dark fibre access (DFA) and dark fibre X (DFX).

<sup>9</sup> WDM means ‘wave division multiplex’. WDM services are sometimes called optical services. See Section 4.

<sup>10</sup> SML means ‘service maintenance level’. Openreach offers a range of [SMLs](#) to its wholesale customers.

Accessed 25 February 2026.

Product	Region	Standard	Level
		Required first available date (FAD)	10 working days
		FAD offered within required FAD	89%
FTTP	WLA Area 3	Repair within 1 working day (SML2)	81%
		Repair within 11 working days (SML2)	96%
		Installations to be completed by the committed date	89%
		Required FAD	18 working days
		FAD offered within required FAD	90%

**Table 1.2 LLA Area 2 and LLA Area 3 and IEC minimum QoS standards**

Standard	Level
Mean Time To Provide (MTTP)	No more than 38 working days
Upper percentile limit for provisions	Must meet at least one of the following: (a) No more than 4.5% of orders older than 133 working days; or (b) no more than 550 orders older than 133 working days.
Certainty: Percentage of orders completed on or before the initial contractual delivery date (iCDD)	86%
Certainty cross-link: Maximum mean period for the iCDD	No more than 53 working days
Faults repaired within the service level agreement (SLA)	94%

- 1.8 In addition to these decisions, our network access obligations also include specific requirements on Openreach which are relevant to QoS, as follows:
- relevant reference offers must include specified service level agreements (SLAs) and provisions to compensate its customers where it fails to deliver to those SLAs (referred to as service level guarantees or SLGs); and
  - no undue discrimination (e.g. to favour BT brands and businesses over other wholesale customers) which includes in relation to the QoS it provides.
- 1.9 These decisions are set out in Volume 3, Section 4.

## 2. Our approach to QoS regulation

- 2.1 In this section we set out our overall approach to QoS regulation.
- 2.2 We consider the need for QoS regulation where we find SMP, the tools for regulating QoS, as well as our decision to impose a specific QoS SMP condition allowing us to direct specific standards and transparency obligations on BT.
- 2.3 We also describe the objectives we consider in deciding whether to give directions in relation to QoS.

### The need for QoS regulation

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- 2.4 We consider that the best means of delivering appropriate levels of QoS is through competition between networks. We believe that competing gigabit networks will deliver better services for UK consumers in terms of speed and reliability.
- 2.5 While network competition should drive QoS for consumers in the long term, it will take time for this competition to become established. Therefore, we need to ensure that consumers and existing models of competition are adequately protected in the short term.
- 2.6 We have also identified areas of the UK where there is not, and there is unlikely to be potential for, material and sustainable competition to Openreach in the commercial deployment of networks. In these areas, we seek to promote competition based on access to Openreach's network and protect consumers.
- 2.7 We have found that BT has SMP in several wholesale fixed telecoms markets as set out in Volume 2. One of the consequences of SMP is that absent regulation, Openreach may not receive market signals from customers switching to alternatives and thus lacks incentives to innovate and deliver the QoS customers require. The negative effects on customers of inadequate QoS delivered by Openreach could include a greater number of faults, slow resolution of those faults and frustration resulting from long delays to the installation of fixed telecoms services such as broadband and voice.
- 2.8 Inadequate QoS by Openreach can also undermine the effective functioning of the network access remedies due to the negative impacts this can have on downstream competition by, among other things, adversely affecting switching behaviour. For example, long or uncertain waiting times for an installation may discourage switching with consequent implications for retail competition. In addition, there is the potential for discrimination if Openreach were to provide BT's downstream divisions with better QoS than it provides to other telecoms providers.
- 2.9 We have decided that, to address the competition problems described above, QoS regulation is needed in the markets in which we have found BT to have SMP. Imposing QoS regulation, in conjunction with other remedies, contributes to getting and keeping UK homes and businesses connected. Access to high-quality, reliable and secure networks is central to all aspects of our digital lives and a key driver of economic growth.

## Tools for QoS regulation

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- 2.10 We have decided to continue using four tools to encourage Openreach to provide an appropriate level of QoS. These are:
- a) **QoS standards**, which provide a higher degree of certainty over the minimum aggregate level of service that Openreach will achieve.
  - b) **Transparency measures**, such as reporting on key performance indicators (KPIs), which make it easier to identify discrimination and monitor compliance with the standards and can also help us to identify emerging issues during the review period. Requiring Openreach to publish certain KPIs also provides an incentive for Openreach to avoid any reputational harm that could arise from poor service performance.
  - c) **Non-discrimination remedies**, which ensure that Openreach provides the same QoS to other wholesale customers that it delivers for BT’s downstream divisions.
  - d) **SLAs/SLGs**, which ensure that Openreach’s wholesale customers receive compensation for individual failures by Openreach to provide the service levels it contractually commits to deliver.
- 2.11 The QoS standards are a minimum service level to be met or surpassed by Openreach rather than a target to achieve.<sup>11</sup> Given that the penalties for non-compliance with minimum QoS standards can be significant, it is incumbent upon us to ensure that they are appropriate and proportionate.<sup>12</sup> However, Ofcom decides on a case-by-case basis whether to investigate instances of suspected non-compliance and can take into account all matters that we consider to be relevant. This could include the impact of uniquely difficult circumstances where appropriate, as was the case during the coronavirus pandemic.<sup>13</sup>
- 2.12 While not part of our SMP regulation, the BT and Openreach Commitments are also relevant to Openreach’s QoS. The current structure of Openreach Limited is a product of the BT and Openreach Commitments.<sup>14</sup> These Commitments were, in turn, an outcome of our 2016 Strategic Review of Digital Communications in which we sought, among other things, increased independence of Openreach from BT.<sup>15</sup> As well as commitments to treat all of its customers equally, they also include remuneration incentives on the Openreach CEO and Executive for high quality of service delivery. We monitor Openreach and BT’s compliance with its Commitments and report annually.<sup>16</sup>
- 2.13 This volume sets out our decisions for imposing QoS standards and transparency measures on BT. The other two tools (non-discrimination and SLAs/SLGs) are discussed in Volume 3, Section 4.

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<sup>11</sup> Openreach faces an asymmetric risk; that is the risk of events causing a decline in quality but not a similar possibility of external events increasing quality. Therefore, to meet minimum QoS standards, Openreach will need to, on average, maintain the QoS it delivers above the standards in normal circumstances, otherwise it runs the risk of failing to meet them.

<sup>12</sup> In 2017, [we fined BT](#) £42m for breaking our regulations by failing to pay other telecoms companies proper compensation when leased line services were not installed on time. BT also agreed to refund its customers around £300m.

<sup>13</sup> We have published new enforcement guidelines. Ofcom. 31 January 2025. [Regulatory Enforcement Guidelines for investigations](#).

<sup>14</sup> BT. 12 August 2024. [Commitments of BT Plc and Openreach Limited to Ofcom – Issue 7](#). Accessed 25 February 2026.

<sup>15</sup> Ofcom. February 2016. [Initial conclusions from the Strategic Review of Digital Communications](#).

<sup>16</sup> Through our [Openreach Monitoring Unit](#).

## Decision to retain a QoS SMP condition

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### Our proposal

- 2.14 We proposed to retain an SMP condition requiring BT to comply with any QoS standard and reporting requirement we direct in relation to network access that it provides in each of the markets in which we have found that BT has SMP i.e., relevant physical infrastructure, WLA, LLA and IEC markets.

### Stakeholder responses

- 2.15 Most stakeholders did not comment on this. This included stakeholders who commented on other aspects of our QoS proposals, and which were predicated on the retention of the above SMP condition. Those that did comment, supported the proposal.<sup>17</sup>

### Our reasoning and decisions

- 2.16 We consider that it is appropriate and proportionate to re-impose this SMP condition on BT in the above markets. This gives us the means to intervene to remedy the harms to competition and consumers that can arise from Openreach providing an inadequate level of service performance.
- 2.17 This decision includes transitional arrangements for postcode sectors which have been reclassified from LLA Area 3 to LLA Area 2 and the HNR Area. As discussed in Volume 3, Section 7, we have reclassified 950 postcode sectors from LLA Area 3 to LLA Area 2 or the HNR Area. For the reasons given in Volume 3, Section 7, we have decided to require Openreach to continue to provide existing DFA circuits in these reclassified postcode sectors for a period of five years.
- 2.18 As discussed in Volume 3, Section 8, we have also decided to reclassify some BT IEC exchanges as BT+2 and have decided to deregulate these. For the reasons given in Volume 3, Section 8 we have decided to require Openreach to continue the supply of (i) existing active leased lines for IEC from these deregulated exchanges for a transitional period of 12 months and (ii) existing DFX from these exchanges for a transitional period of 3 years.
- 2.19 We consider it is necessary for QoS requirements to be imposed for the transitional periods for these services to ensure that consumers still receive an appropriate level of QoS, and Ofcom and industry can continue to have visibility of the level of QoS being delivered, throughout the transition period. Otherwise, Openreach would, subject to its contractual obligations with telecoms providers, be able to lower the QoS provided for these circuits.
- 2.20 Whether we should exercise the power provided by the SMP condition to direct BT to comply with minimum QoS standards and / or transparency obligations is a matter of regulatory judgement. We set out below the objectives we have in mind when considering making this judgement.

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<sup>17</sup> [VodafoneThree](#) response to TAR26 March 2025 Consultation. Pages 23-25. (This response also includes comments about Ofcom's [automatic compensation scheme](#) which we cover in Volume 3, Section 1.)  
[Openreach](#) response to TAR26 March 2025 Consultation. Document 5. Paragraphs 1-2.

## Alignment with our objectives

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- 2.21 In determining an appropriate and proportionate package of QoS regulation, we have decided to exercise our discretion in favour of an approach that aligns with the TAR26 objectives set out in Volume 3, Section 1.
- 2.22 In summary, for markets downstream of physical infrastructure, we differentiate between places where material and sustainable network competition is viable, and places where such competition is unlikely to emerge:
- a) where there is, or there is likely to be the potential for, material and sustainable competition, our objective is to promote investment and competition in networks by Openreach and other telecoms providers, and to provide adequate protection to consumers and existing models of downstream competition in the short term; and
  - b) where material and sustainable network competition does not exist, or there is unlikely to be the potential for it, we aim to promote investment in gigabit-capable networks by Openreach, to promote competition based on access to Openreach's networks and to protect consumers.
- 2.23 In considering these objectives when determining whether to direct BT to comply with minimum QoS standards (and, if so, what those standards should be), we are mindful that there is a risk of regulatory interventions undermining the development of network competition, and a risk of regulatory failure.
- 2.24 Where there is potential for competition, this competition takes time to emerge. We therefore need to provide adequate protection but need to do it in a way that does not undermine the development of network competition.
- 2.25 Where we think minimum standards are required, we are mindful of the risk of setting standards too high, which would be inefficient, leading to higher prices or lower investment by Openreach.
- 2.26 In the following sections, we set out our reasoning and decisions given:
- market developments since 2021;
  - those developments we may expect over the review period; and
  - our objectives for this review.

## 3. QoS regulation in WLA markets

- 3.1 This section sets out our decisions relating specifically to QoS regulation in those WLA markets where we find that BT has SMP.<sup>18</sup>
- 3.2 For the reasons set out in Section 2 of this volume, we have decided to continue to impose an SMP condition requiring BT to comply with all such QoS requirements as we may direct in relation to network access provided by BT and to publish information about the QoS it provides as we may direct.
- 3.3 In WLA markets, the Openreach products that we are principally concerned with in relation to QoS are:<sup>19</sup>
- FTTP;
  - FTTC including G.fast, SOGEA and SOGfast; and
  - MPF including SOTAP.
- 3.4 We set minimum QoS standards and/or transparency and reporting obligations on these products in the WFTMR21.<sup>20</sup> They apply or relate to Openreach's performance in installing these products in response to orders placed by its wholesale customers and to its performance in repairing reported faults.
- 3.5 In this section, we start by setting out our review of Openreach's performance since the WFTMR21, followed by our assessment of factors which could impact QoS in these markets over the 2026-31 review period. We then set out the minimum QoS standards we have decided to impose on BT and our reasoning followed by our decision on transparency and reporting requirements.

### Review of Openreach's recent WLA service performance

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#### FTTC and MPF performance

- 3.6 In the WFTMR21, we imposed minimum QoS standards for FTTC and MPF products as set out in Table 3.1 below. This reflected our view at the time that there had been a steady improvement and stabilisation in Openreach's delivery of QoS in the period up to 2019/20, in line with the minimum QoS standards we imposed in the 2014 review and again in the 2018 review.
- 3.7 We determined that those standards should be maintained in the 2021-26 review period, other than a temporary relaxation in standards in Year 1 of the period due to the impact of the Covid-19 pandemic. We determined that increasing standards further would have been

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<sup>18</sup> Our SMP findings are set out in Volume 2.

<sup>19</sup> These being products which Openreach supplies to comply with its network access obligations.

<sup>20</sup> Ofcom. March 2021. [Promoting investment and competition in fibre networks – Wholesale Fixed Telecoms Market Review 2021-26](#). Volume 5.

disproportionately costly given the limited consumer benefit that we expected from any additional increase.<sup>21</sup>

**Table 3.1 Minimum WLA QoS standards (2021-2026)<sup>22</sup>**

Standard	Level (Year 1)	Level (Years 2-5)
Repair within 2 working days (SML1)	83%	85%
Repair within 1 working day (SML2)		
Repair within 7 working days (SML1)	96%	97%
Repair within 6 working days (SML2)		
Installations to be completed by Committed Date	91%	94%
First Available Date (FAD) for installations requiring an engineer visit - working days within which first date offered for installation appointments	12 days	10 days
Quality standards in relation to the FAD - Frequency with which regulated installation appointment date must be offered	89%	89%

- 3.8 We have assessed Openreach’s performance over the WFTMR21 period up to December 2025. For almost all of this period, Openreach has been consistently above the required standards. The main exception was the period around industrial action in the second half of 2022, where performance dipped. We investigated in 2023 and concluded that three of the minimum QoS standards had been breached. Our decision set out some observations on Openreach’s approach that it should learn from but concluded that a fine was not appropriate.<sup>23</sup>
- 3.9 More generally, performance of FTTC and MPF products across different KPIs appears to be steady over the period with minor improvements in some KPIs. We have not observed a material deviation in any KPI.<sup>24</sup>
- 3.10 More detailed information on Openreach’s FTTC and MPF QoS performance over the current period is contained in Annex 9.

<sup>21</sup> Ofcom. March 2021. [Promoting investment and competition in fibre networks – Wholesale Fixed Telecoms Market Review 2021-26](#). Volume 5. Paragraph 3.6.

<sup>22</sup> Standards had to be met individually in all of Openreach’s Management Regions, aside from the “Repair within 6/7 working days standard”, which had to be met nationally. Openreach could also exclude some repair or provisioning orders impacted by MBORC events from the calculation in up to 2 regions. Ofcom. March 2021. [Promoting investment and competition in fibre networks – Wholesale Fixed Telecoms Market Review 2021-26](#). Volume 7. Page 240.

<sup>23</sup> Ofcom. March 2024. [Confirmation Decision served on BT by the Office of Communications \(Ofcom\) for contravention of SMP Condition 10.1. Case reference: CW/01273/06/23](#).

<sup>24</sup> Openreach reports to Ofcom. Report 1152 and Ofcom Summary Sheet. December 2025.

## FTTP performance

- 3.11 In the WFTMR21, we decided not to set QoS standards for FTTP products due to the relatively small volumes and therefore the limited historical data from which an appropriate standard could be determined.<sup>25</sup> However, we did require Openreach to provide KPIs to us so we could observe trends in FTTP performance.
- 3.12 These KPIs show that FTTP performance has generally either been maintained or improved over the period. Significant improvements can be seen in repair completion and minimising missed appointments, while performance on appointment availability commitments and completion of installations have been steadier. The main exception was a material deterioration in performance during, and in the period following, the industrial action mentioned above. There was also another drop in November and December 2024, which we understand was due to the impact of inclement weather and higher than expected demand.<sup>26</sup>
- 3.13 More detailed information on Openreach’s FTTP QoS performance from 2021-2025 is contained in Annex 9.

## Comparison of FTTP and FTTC performance

### Provisioning

- 3.14 Openreach performance in provisioning FTTP is generally lower than FTTC. However, we would expect this.
- 3.15 Installing FTTP for the first time usually takes longer and can be more uncertain than FTTC because it is a more complex provisioning process.<sup>27</sup> A fibre connection needs to be made into the premises and a new optical network terminal (ONT) installed.<sup>28 29</sup> FTTC provisioning is unlikely to be as complex. In many cases an existing copper line from the premises to be served can be connected by an engineer at the street cabinet, often without requiring a visit to the premises.<sup>30</sup>
- 3.16 Figure 3.1 illustrates how [redacted] and Figure 3.2 illustrates how performance of completed installations by the committed date has been lower for FTTP than FTTC.

**Figure 3.1: FTTP and FTTC: Percentage of times Openreach provides a first appointment within 10 working days (12 working days in 2021/22)<sup>31</sup>**

[redacted]

<sup>25</sup> Ofcom. March 2021. [Promoting investment and competition in fibre networks – Wholesale Fixed Telecoms Market Review 2021-26](#). Volume 5. Paragraphs 3.102-3.105.

<sup>26</sup> [redacted].

<sup>27</sup> First time installations account for most orders for Openreach FTTP at this time, and we expect this to remain the case for some time to come. These were 77% in 2022-23. Openreach. November 2024. Openreach SD metrics overview. Slide 5.

<sup>28</sup> Either overhead from a nearby pole or buried from a nearby flex point e.g., in the pavement and then into the premises through a drilled hole. In a minority of cases, additional civil works are needed to extend the fibre network to reach the premises to be served.

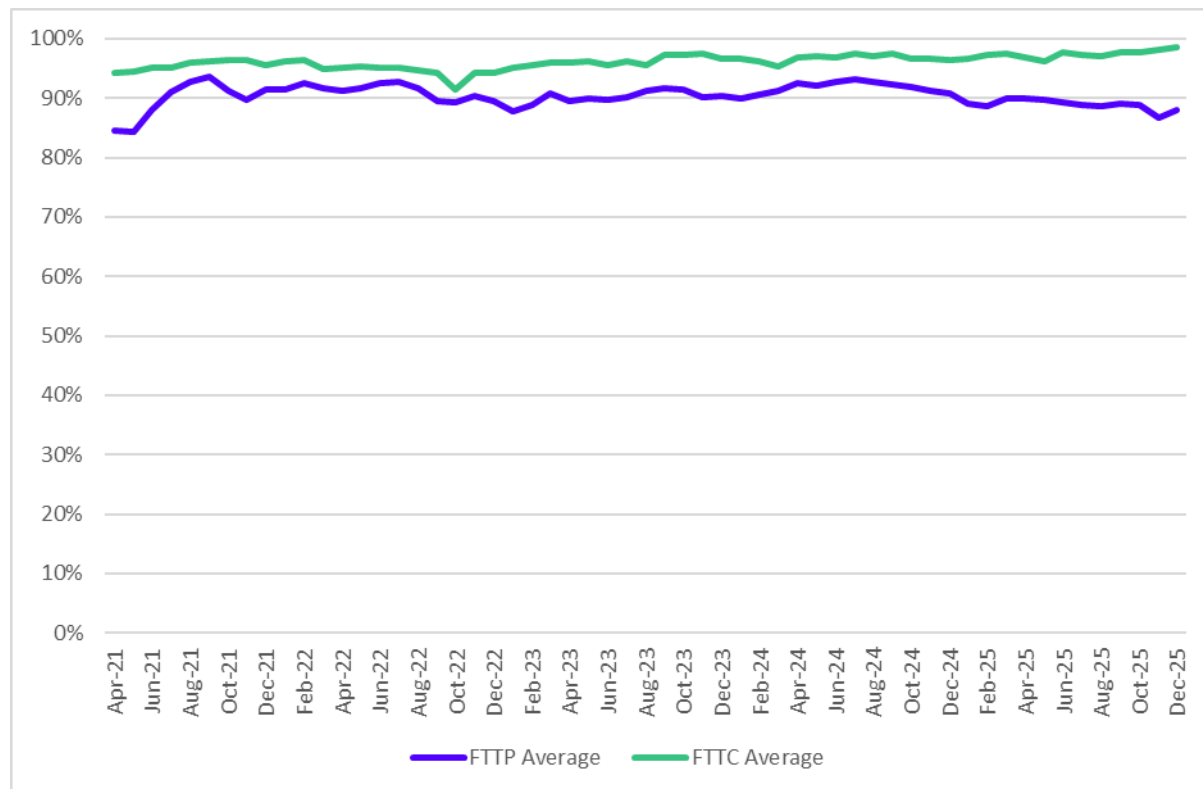
<sup>29</sup> Unlike the network termination equipment (NTE) for copper connections, the ONT for FTTP requires power.

<sup>30</sup> So, in many cases, no appointment needs to be organised with the end-user.

<sup>31</sup> KPI 1 (a). Openreach reports to Ofcom. Report 1152 and Ofcom Summary Sheet. December 2024.

Source: Ofcom analysis of Openreach reports to Ofcom. WFTMR WLA KPI Report – December 2025.

**Figure 3.2: FTTP and FTTC: Percentage installation completed by the committed date<sup>32</sup>**



Source: Ofcom analysis of Openreach reports to Ofcom. WFTMR WLA KPI Report – December 2025.

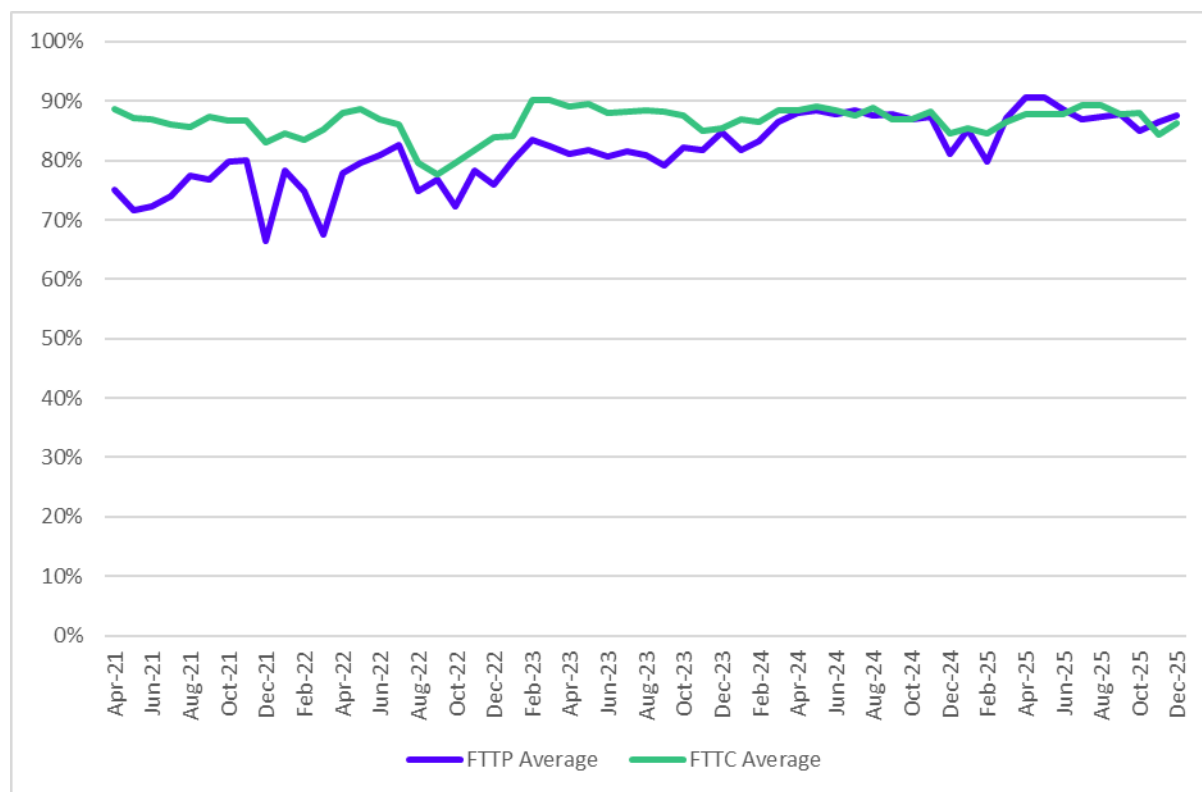
3.17 We also recognise that complex FTTP installations can, due to unforeseen issues, affect a small subset of customers who may be subject to lengthy delays. We have assessed the potential impact of these delays and how they affect certain customers. We discuss this further below.

### Repair

3.18 FTTP products have materially lower fault rates than FTTC which results in a better overall outcome for users. [32].<sup>33</sup> Repair completion rates within 1 working day (SML2) for FTTP have historically been slightly lower than for FTTC but the gap has closed in recent months. This is illustrated in Figure 3.3 below which shows monthly FTTC and FTTP repair completion performance for the period April 2021 to December 2025.

<sup>32</sup> KPI 2 (a). Openreach reports to Ofcom. Report 1152 and Ofcom Summary Sheet. October 2025. Orders completed by the committed date include those (more complex) orders where a committed date was provided after a survey (the KC12 Assure process) to allow further works to be completed.

<sup>33</sup> [32].

**Figure 3.3: FTTP and FTTC: Percentage Repair completion by SML2<sup>34</sup>**

Source: Ofcom analysis of Openreach reports to Ofcom. WFTMR WLA KPI Report – December 2025.

## Assessment of the need for QoS standards

- 3.19 In this subsection, we explain our decision to set QoS standards in WLA markets for the review period.
- 3.20 As set out in Volume 2, we have split the WLA market into separate geographic areas depending on whether there are appreciable differences in competitive conditions across postcode sectors, which are stable over time. As described above, these different characteristics lead to different objectives in WLA Area 2 and WLA Area 3.<sup>35</sup>
- 3.21 Due to the different objectives, we have separately assessed potential market developments and the appropriateness of QoS remedies for different network products in each WLA Area. We have therefore separately considered:
- FTTC and MPF in WLA Area 2;
  - FTTC and MPF in WLA Area 3;
  - FTTP in WLA Area 2; and
  - FTTP in WLA Area 3.

<sup>34</sup> Percentage Repair completion i.e., for SML2, the percentage of Faults where Openreach restored Service within the Repair Service Level timeframe. KPI 3 (b) (i). Openreach reports to Ofcom. Report 1152 and Ofcom Summary Sheet. December 2025.

<sup>35</sup> Unless stated otherwise, calculations relating to WLA Area 2 and WLA Area 3 reflect our final decision on the market boundaries as set out in Volume 2, rather than the proposed market definitions that were used in the TAR26 March 2025 Consultation.

## Legacy copper-based products

### FTTC and MPF (WLA Area 2)

#### Our proposals

- 3.22 We proposed to maintain minimum standards for FTTC and MPF in WLA Area 2 equivalent to the current levels.

#### Stakeholder responses

- 3.23 A broad range of stakeholders agreed that we should maintain minimum QoS standards for legacy copper-based products.<sup>36</sup> Reasons for this position included: the continued reliance of many consumers on legacy copper-based products during the 2026-31 review period; and because Openreach may have an even stronger incentive to reduce copper service quality in the future.
- 3.24 However, AllPoints Fibre said that if we decided not to implement minimum QoS standards in WLA Area 2 for FTTP, then we should remove them for the legacy copper-based products to ensure that Openreach are not incentivised to prioritise those products over FTTP.<sup>37</sup>

#### Our reasoning and decisions

- 3.25 We have decided to maintain minimum QoS standards for FTTC and MPF products in WLA Area 2 equivalent to the current levels. We consider the standards offer sufficient protection against potential decreases in performance for those customers who remain on FTTC/MPF for this review period and consider any risks of maintaining them are likely to be limited.
- 3.26 Customers are increasingly likely to have FTTP available as an alternative to using these products. We expect there to be increasing migration from legacy copper-based products to FTTP over the review period and a consequential decrease in volumes.<sup>38</sup>
- 3.27 We have considered whether this means that we should remove QoS standards for copper-based products in WLA Area 2. While we expect greater availability and take-up of FTTP in this review period, we think it is important that existing FTTC/MPF customers retain adequate protection as the market develops.
- 3.28 This is because, without minimum standards, Openreach may have a stronger incentive to allow FTTC and MPF repair QoS to decline, since experiencing poor service may prompt those consumers (who are able to) to switch to Openreach FTTP. Minimum FTTC/MPF QoS standards relating to fault repair are likely to become more important than provisioning minimum QoS standards in the 2026-31 review period, since demand for new provisions is expected to decline quite sharply whereas the installed customer base (and thus repairs) may decline more gradually.
- 3.29 We also consider that any risks of maintaining minimum QoS standards for copper-based products in WLA Area 2 are likely to be limited.

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<sup>36</sup> [Openreach](#) response to TAR26 March 2025 Consultation. Document 5. Paragraph 3; [Sky](#) response to TAR26 March 2025 Consultation. Paragraph 111; [PXC](#) response to TAR26 March 2025 Consultation. Paragraph 2.36; [VodafoneThree](#) response to TAR26 March 2025 Consultation. Section 2, Paragraph 17; [Which?](#) response to TAR26 March 2025 Consultation. Page 6.

<sup>37</sup> [AllPoints Fibre](#) response to TAR26 March 2025 Consultation. Paragraph 15.

<sup>38</sup> See Volume 3, Section 6.

- a) The existing minimum standards and levels have been in place since 2018 and are a relatively settled benchmark recognised by both Openreach and its customers. This suggests that keeping the standards at the same level is a relatively low risk option, which provides a safety net for FTTC/MPF customers, while also being unlikely to lead to materially poor regulatory outcomes.<sup>39</sup>
- b) We consider that maintaining FTTC/MPF standards in WLA Area 2 is unlikely to materially affect investment in FTTP networks by Openreach, VMO2 or altnets, or the development of network competition. There has been significant investment in FTTP since 2021 against the backdrop of these longstanding standards, so maintaining them should not have a material adverse impact. In addition, customers will still have a significant incentive to migrate to FTTP due to the better service it delivers.
- c) We recognise AllPoints Fibre’s concern that having minimum QoS standards on legacy copper-based products but not FTTP products could potentially provide an incentive for Openreach to focus on the service quality of the former to the detriment of the latter. However, we consider there to be stronger incentives for Openreach to maintain FTTP service performance in WLA Area 2, both to increasingly meet competitive pressure from altnets as network competition develops and to encourage FTTC customers to migrate to FTTP. We discuss this further below.

3.30 Overall, we recognise that there are some risks with continuing to set minimum QoS standards in Area 2 for legacy copper-based products but not FTTP products. However, we consider any risks are outweighed by the benefits described above.

### FTTC and MPF (WLA Area 3)

3.31 We also proposed to retain minimum QoS standards for FTTC and MPF products in WLA Area 3. We received no submissions specifically on this and we have therefore decided to proceed with our proposal.

3.32 In addition to the arguments set out above for FTTC and MPF products in WLA Area 2, we consider that material and sustainable competition is unlikely to develop in WLA Area 3. This may create a stronger incentive on Openreach to allow FTTC/MPF repair QoS to decline, as there will be limited risk that customers could migrate to a rival network, as opposed to Openreach’s FTTP network.

3.33 Below, we set out the specific level of minimum QoS standards for copper-based WLA products for the 2026-31 review period.

## FTTP

3.34 We have assessed whether it is appropriate to set QoS standards for FTTP for the first time. As with FTTC and MPF we have considered the appropriateness of introducing standards for FTTP separately in WLA Area 2 and WLA Area 3.

### FTTP (WLA Area 2)

#### Our proposals

3.35 We proposed not to introduce minimum standards for FTTP in WLA Area 2 as we considered that QoS is an important dimension of network competition. We said that there is a risk that introducing minimum QoS standards could undermine the development of

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<sup>39</sup> Poor outcomes could arise when standards are set ‘too high’, leading to significant costs incurred by Openreach for minimal benefit, or when standards are set ‘too low’, leading to ineffective regulation.

network competition because, amongst other things, it could reduce the extent to which ISPs are willing to purchase wholesale services from a competing network. We considered that supporting the development of stronger network competition was ultimately likely to be in consumers' long-term interests. We also noted that Openreach's performance (as reported against KPIs) did not suggest that the lack of minimum QoS standards was resulting in significant consumer harm.

### Stakeholder responses

- 3.36 Several stakeholders suggested that minimum FTTP standards should be set for WLA Area 2 (as well as WLA Area 3).<sup>40</sup> The main concerns with our proposal were that:
- a) Competition in WLA Area 2 is uneven and insufficiently developed to provide enough of a constraint on Openreach that would appropriately limit the risk of future performance deterioration.
  - b) Setting FTTP minimum standards in WLA Area 3 but not WLA Area 2 may create an incentive for Openreach to relocate resources away from WLA Area 2 to WLA Area 3, to the detriment of WLA Area 2 customers. UKCTA noted that this may be particularly concerning where Openreach faces 'minimal, clustered competition'.<sup>41</sup>
- 3.37 There were some differences in stakeholders' views on the existing and potential performance of Openreach relative to altnets.
- 3.38 Sky suggested that Openreach's FTTP QoS performance appeared to be inadequate when considering comparative performance statistics provided to the OTA2-chaired Service Management Forum in December 2024.<sup>42</sup> [X] mentioned that the minimum QoS standards for FTTP currently offered to [X] by [X] are better or in line with the minimum standards Ofcom proposed introducing in WLA Area 3. [X] also expect that [X] would perform significantly above these minimum standards.<sup>43</sup>
- 3.39 PXC suggested that Openreach effectively sets the de facto QoS benchmark for FTTP services across the UK including in WLA Area 2. This is because competition is still nascent in WLA Area 2, and altnets lack the experience and track record to develop service standards which vary significantly from those set by Openreach.<sup>44</sup>
- 3.40 Openreach said that if we choose to impose minimum QoS standards for FTTP, it agrees they should apply to WLA Area 3 only.<sup>45</sup>

### Our reasoning and decisions

- 3.41 We have decided not to introduce minimum standards in this review for FTTP in WLA Area 2, for the reasons set out below.

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<sup>40</sup> [FCS](#) response to TAR26 March 2025 Consultation. Pages 3-4; [Gamma](#) response to TAR26 March 2025 Consultation. Page 6; [PXC](#) response to TAR26 March 2025 Consultation. Paragraphs 2.29-2.34; [VodafoneThree](#) response to TAR26 March 2025 Consultation. Section 2, Paragraph 19-24; [AllPoints Fibre](#) response to TAR26 March 2025 Consultation. Paragraph 15; [Substantial Group Limited](#) response to TAR26 March 2025 Consultation. Page 9.

<sup>41</sup> [UKCTA](#) response to TAR26 March 2025 Consultation. Paragraph 11.

<sup>42</sup> [Sky](#) response to TAR26 March 2025 Consultation. Paragraph 121.

<sup>43</sup> [X] confidential response to TAR26 March 2025 Consultation. [X].

<sup>44</sup> [PXC](#) response to TAR26 March 2025 Consultation. Paragraph 2.29.

<sup>45</sup> [Openreach](#) response to TAR26 March 2025 Consultation. Document 5. Paragraph 38.

- 3.42 WLA Area 2 covers locations where we consider there is, or there is likely to be the potential for, material and sustainable network competition. The evidence suggests that QoS is, and will continue to be, an important dimension of network competition. [§].<sup>46</sup>
- 3.43 We expect that as network competition develops, it will increasingly drive FTTP QoS in WLA Area 2.<sup>47</sup>
- 3.44 Given this, we have considered the impact of minimum FTTP standards in WLA Area 2: (i) on the development of network competition; (ii) on the short term risk of consumer harm; (iii) given our decision to introduce minimum QoS standards in WLA Area 3 (discussed below); and (iv) in light of the other regulatory safeguards we have put in place.
- 3.45 In terms of the first issue, we consider that there is a risk that introducing minimum QoS standards could undermine the development of network competition. In particular, setting a minimum QoS standard for Openreach FTTP, could reduce the extent to which ISPs, currently reliant on Openreach’s wholesale services, choose to purchase wholesale services from a competing network.<sup>48</sup> Our concern is not limited to an ISP’s decision to contract with an altnet in the first place, but extends to the ISP’s ongoing decisions to place volumes with the altnet under that contract, given [§].<sup>49</sup>
- 3.46 We recognise that QoS is not the only factor affecting ISPs’ future decisions to use altnets. However, we consider it is a factor, particularly as some ISPs are likely to use a range of networks or potentially change the networks they use over time.
- 3.47 While the scale of any impact may depend on the level of those minimum standards, we consider that setting minimum standards at all risks setting expectations about continued QoS regulation in these areas. There is also a risk that standards are set above the competitive level and the higher costs imposed on both Openreach and competitors could lower the incentives for further investment.<sup>50</sup>
- 3.48 Stakeholders expressed concern about the level and unevenness of competition. In the light of this, we have considered the second issue, namely the risk of short-term consumer harm, as follows:
- a) Given the impact of minimum QoS standards on the future development of network competition, unless there is a significant risk of short-term consumer harm from inadequate FTTP QoS, we consider that competition should be allowed to play out rather than introduce new regulation prematurely.
  - b) The absence of minimum standards to date does not appear to be resulting in significant consumer harm. As mentioned above, KPIs covering QoS on FTTP services, have generally been steadily improving. There have been some periods where they have dropped temporarily, for example, following industrial action in 2022, and more recently in November and December 2024. However, at this stage we do not consider that there is evidence of material and persistent FTTP QoS issues that mean it would be necessary or appropriate to propose introducing minimum QoS standards.

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<sup>46</sup> [§] response dated [§] to s135 notice dated [§]. [§].

<sup>47</sup> In addition, both Openreach and altnets may also want to improve QoS more generally in order to encourage consumers and ISPs to use their new FTTP networks.

<sup>48</sup> We explain the relationship between take-up and network competition in Volume 3, Section 1.

<sup>49</sup> See Volume 2. Section 4. Paragraph 4.371.

<sup>50</sup> As set out above, PXC argued that rival networks’ QoS performance is heavily influenced by Openreach’s performance.

- c) As discussed above, we expect network competition will play an increasing role in driving QoS. We expect there to be incentives for Openreach to at least maintain if not improve FTTP service performance in WLA Area 2 over this review period, both to increasingly meet competitive pressure from altnets as network competition develops and to encourage FTTC customers to migrate to FTTP. We consider these incentives together reduce the risk of significant deteriorations in Openreach’s performance and therefore short-term consumer harm.<sup>51</sup>
- d) Comparisons between different networks are challenging as obtaining information on an exact like-for-like basis can be challenging. We have some information that suggests differences in performance between Openreach and altnets can vary by metric and over time.<sup>52</sup> However, we have not seen evidence to conclude that the existing performance of Openreach has been materially above or below altnets on a consistent basis.
- e) Openreach has been engaging and continues to engage with industry (via the OTA2 forum) to agree metrics, and work towards setting “ambitions”/targets for performance.<sup>53</sup> We understand that this is an ongoing process and agreement may not always be reached. However, we consider this approach helps lower the potential for short-term consumer harm.

3.49 Given the above, we do not consider there to be a significant risk of consumer harm from inadequate FTTP QoS if we do not impose minimum standards in WLA Area 2.

3.50 We recognise QoS issues can still occur for individual consumers. Specifically, we are aware that a minority of customers migrating to FTTP can be subject to significant delays and uncertainty when their FTTP installation encounters unforeseen engineering issues (e.g., a blocked duct).<sup>54</sup> However, we do not consider that imposing a minimum QoS standard is likely to improve outcomes for consumers in this type of scenario.

- a) We consider that setting a minimum QoS standard to reduce the installation time of more complex installations may result in negative consequences. In particular, it may discourage Openreach from making FTTP available to premises which are more likely to have complex installations. This is because, in addition to the cost of a more difficult installation, provisioning to these premises would increase the risk of a breach of quality standards. Openreach may therefore decide that it is not commercially viable to offer FTTP to premises where there is a risk of a complex installation.
- b) Openreach has rolled out changes to the installation process to limit the number of customers who are subject to a more complex installation process.<sup>55</sup> We encourage this where it provides greater certainty and improved installation times. The evidence shows that this has reduced the percentage of customers subject to longer, uncertain installations.<sup>56</sup>

3.51 In terms of the third issue, we do not consider that introducing minimum QoS standards for WLA Area 3 but not WLA Area 2 would result in a significant reallocation of resources, as

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<sup>51</sup> We also consider that this alleviates the risk identified by PXC that poor Openreach performance leads to poor QoS performance by rival networks.

<sup>52</sup> Ofcom analysis of [redacted] data and Openreach reports. [redacted] response dated [redacted] to s135 notice dated [redacted], questions [redacted]. Openreach WFTMR WLA KPI Report – December 2025.

<sup>53</sup> [redacted].

<sup>54</sup> [redacted].

<sup>55</sup> Broadly, Openreach is planning to increase the number of orders where it commits to an installation date at the point of sale, rather than wait for an engineering assessment before committing to an installation date. This is the Customer Journey Optimisation (CJO) process. See paragraph 3.138.

<sup>56</sup> Openreach response dated 4 September 2025 to s135 notice dated 13 August 2025, question 8.

suggested by some stakeholders. As described above, we expect network competition to play an increasing role in driving QoS in WLA Area 2 over this review period, which – along with the need to migrate customers from FTTC to FTTP to support its investment case – will provide an incentive on Openreach to maintain performance, even in the absence of minimum QoS standards. This incentive is likely to limit any potential reallocation of resources to WLA Area 3.

- 3.52 Fourth, we have taken into account the other regulatory safeguards we have put in place to protect FTTP customers in WLA Area 2, even in the absence of minimum QoS standards:
- a) We have decided to retain the existing FTTP reporting and SLA/SLG requirements. These will provide some protection for consumers, both via a reputational incentive and compensation for poor performance. We consider that these requirements together with the impact on QoS from developing network competition will provide adequate protection.
  - b) We will also monitor FTTP QoS performance using KPIs and, if a material issue with QoS becomes apparent during the 2026-31 period, we can consider if additional interventions are appropriate.

### FTTP (WLA Area 3)

#### Our proposals

- 3.53 In contrast to FTTP in WLA Area 2, we proposed introducing minimum QoS standards in WLA Area 3 for FTTP.

#### Stakeholder responses

- 3.54 Openreach said that FTTP minimum QoS standards are not required in WLA Area 3. It suggested that we allow the market to mature and only intervene when we find evidence that Openreach's service performance is not sufficiently high.<sup>57</sup>
- 3.55 Several other stakeholders agreed with our proposal to introduce minimum QoS standards in FTTP WLA Area 3.<sup>58</sup>

#### Our reasoning and decisions

- 3.56 We have decided to proceed with our proposal to introduce minimum QoS standards in WLA Area 3 for FTTP.
- 3.57 We consider that material and sustainable network competition is unlikely to develop in WLA Area 3. This means that without regulation, there is a greater risk of inadequate QoS delivered by Openreach (as described above), and therefore significant consumer harm.
- 3.58 Given that we do not have an objective in WLA Area 3 to promote network competition, there is not the same risk as in WLA Area 2 of minimum QoS standards undermining the development of competition. Therefore, given the risks of consumer harm for FTTP in WLA Area 3, we have decided that minimum QoS standards in WLA Area 3 are necessary.
- 3.59 We disagree with Openreach's view that we should only set standards once we identify Openreach's performance is not sufficiently high. Historical precedent makes it clear that

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<sup>57</sup> [Openreach](#) response to TAR26 March 2025 Consultation. Document 5. Paragraphs 7-8.

<sup>58</sup> [PXC](#) response to TAR26 March 2025 Consultation. Paragraphs 2.29; [Scottish Government](#) response to TAR26 March 2025 Consultation. Page 2; [VodafoneThree](#) response to TAR26 March 2025 Consultation. Section 2, Paragraph 23; [Which?](#) response to TAR26 March 2025 Consultation. Page 6.

Openreach performance could fall to lower levels for network access products.<sup>59</sup> Although QoS has improved since then, this change is likely to have been influenced to a reasonable extent by the introduction of minimum QoS standards in 2014 and the subsequent raising of those standards in 2018.<sup>60</sup>

- 3.60 The low likelihood of material and sustainable competition developing in WLA Area 3 means that we consider it is appropriate to guard against the risk of any deterioration in performance by introducing minimum QoS standards.
- 3.61 However, during a period of rollout and growing FTTP customer numbers, we consider there is a risk that setting a stretching minimum QoS standard could lead to regulatory failure. For example, this could occur if it reduced the incentive on Openreach to offer FTTP to premises where it is more difficult to install, as a refusal of Openreach to offer FTTP to a premises is likely to be more detrimental to that consumer than reduced QoS performance.
- 3.62 To reduce this risk, we have set standards to provide a backstop to ensure that the service does not drop below the level that Openreach has already shown it can achieve, to guard against the risk of any future deterioration in performance. We consider this is a proportionate approach as it limits the risk of any regulatory failure from setting standards too high (particularly while rollout and take-up is still increasing in WLA Area 3) but also provides adequate protection to consumers who are unlikely to benefit from future network competition.
- 3.63 We set out how we have set standards for FTTP in WLA Area 3 below.

## Minimum QoS standards and levels

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- 3.64 We set out below the minimum QoS standards we have decided to set for the following markets:
- a) FTTC and MPF across WLA Area 2 and WLA Area 3; and
  - b) FTTP in WLA Area 3.

## Minimum standards for FTTC and MPF

### Our proposals

- 3.65 For FTTC and MPF minimum QoS standards, we proposed to:
- a) maintain the existing standards for FTTC and MPF that were used in the 2021-26 period; and
  - b) remove the requirement that standards for installations need to be met for individual UK management regions.<sup>61</sup>

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<sup>59</sup> Ofcom. 2014. [Fixed Access Market Reviews Statement](#). Volume 1. Section 9.

<sup>60</sup> We have previously undertaken analysis that indicated improved Openreach performance was linked to minimum QoS standards. We also found that ISPs also considered improvements in Openreach performance were, in part, a result of the standards. Ofcom. 6 May 2020. [Improving broadband and landline standards. A review of how Ofcom's service quality rules have affected Openreach's service level performance](#).

<sup>61</sup> The WFTMR21 FTTC standards must all be met in 5 (out of 7) of Openreach's Management Regions, aside from the "Repair within 6/7 working days standard", which must be met nationally.

## Stakeholder responses

- 3.66 Several stakeholders, including Openreach, agreed with our proposal to maintain the existing minimum QoS standards for FTTC and MPF.<sup>62</sup>
- 3.67 Consumer Scotland and the Welsh Government had concerns about removing the requirement that standards need to be met for individual management regions and in particular how this might affect the service for customers in “less densely populated areas” and “remote and rural” areas.<sup>63 64</sup> Consumer Scotland also asked for more detail on how we would monitor any divergence of individual regions from the average national performance.
- 3.68 Openreach agreed with our decision to set standards at a national rather than regional level.<sup>65</sup> In an earlier submission, Openreach forecast an approximate [%] drop in FTTC provisions between 2021-22 and 2027-28.<sup>66</sup> It suggested the forecast lower volumes would mean it was no longer proportionate to require either repair or provision standards to be met for individual regions. Openreach also suggested that removing this requirement would help manage the upward pressure on task times that arises from having FTTC customers that are increasingly rural.<sup>67</sup>

## Our reasoning and decisions

### Maintaining existing standards

- 3.69 We have decided to maintain the existing standards for FTTC and MPF that were used in the 2021-26 period. As outlined above, we consider there are strong reasons for keeping current standards:
- They are a relatively settled benchmark recognised by Openreach and its customers.
  - We do not have any evidence or submissions from stakeholders related to performance of FTTC or MPF products that suggests a change to the current standards is needed.
  - The broad agreement from stakeholders to keep the FTTC and MPF standards at the current levels.
- 3.70 For these reasons, we consider it is proportionate to keep the existing standards over the course of the review period.

### Meeting standards for individual UK management regions and the impact of increasing rurality

- 3.71 We consider below:
- Whether the application of minimum QoS standards in each region remains appropriate.
  - Whether specific changes are needed to account for FTTC customers becoming increasingly rural on average, with a higher cost associated with provisioning and

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<sup>62</sup> [Openreach](#) response to TAR26 March 2025 Consultation. Document 5. Paragraph 3 iii. [Sky](#) response to TAR26 March 2025 Consultation. Paragraph 111. [PXC](#) response to TAR26 March 2025 Consultation. Paragraph 2.36. [VodafoneThree](#) response to TAR26 March 2025 Consultation. Section 2, Paragraph 17. [Which?](#) response to TAR26 March 2025 Consultation. Page 6.

<sup>63</sup> [Consumer Scotland](#) response to TAR26 March 2025 Consultation. Page 7.

<sup>64</sup> [Welsh Government](#) response to TAR26 March 2025 Consultation. Page 3.

<sup>65</sup> [Openreach](#) response to TAR26 March 2025 Consultation. Document 5. Paragraph 3 ii.

<sup>66</sup> Openreach. 26 July 2024. Telecoms Access Review (TAR) 2026. Openreach Submission. Non-Confidential version for publication. Paragraph 194.

<sup>67</sup> Openreach. 26 July 2024. Telecoms Access Review (TAR) 2026. Openreach Submission. Non-Confidential version for publication. Paragraph 200.

repairs, meaning that it is more difficult for Openreach to meet a UK-wide performance standard.

#### **Removing the requirement for minimum QoS standards to apply to all UK regions.**

- 3.72 We have decided to remove the requirement that minimum QoS standards should apply separately to all Openreach UK management regions for FTTC, as we consider it would provide some flexibility to manage its resourcing of FTTC and MPF repairs and provisioning as volumes decline.
- 3.73 We have decided to maintain the UK-wide minimum QoS standards so overall UK-wide performance would be maintained. We also still require KPI reporting on a management region basis and so will be able to respond if we observe consistently lower performance in individual regions.
- 3.74 Consumer Scotland and the Welsh Government disagreed with our approach and said that the removal of regional QoS standards could impact more remote consumers. However, we do not think that merging regions meaningfully changes the incentives on Openreach to manage customers in more challenging and remote locations. The existing management regions tend to be large (e.g. Scotland is one region) and have a mixture of rural and non-rural properties.<sup>68</sup> Therefore, even when regional standards are applied there may be variations in service between consumers in rural and non-rural locations.<sup>69</sup> Therefore, we do not think that removing regional standards is likely to impact the service to remote and rural consumers in the way suggested.
- 3.75 Overall, we think this change is proportionate and the KPIs would allow us to monitor future performance. We do not consider it is appropriate to provide specific details in advance on what action we might take, and when we might take it, if we saw future divergence in regional performance. This is because there are likely to be a number of contextual factors (e.g., the number of consumers on legacy copper-based products at that time) that would be relevant to our approach.

#### **Impact of increasing rurality**

- 3.76 We recognise that having an increasing proportion of customers on copper-based products in rural areas could potentially make meeting provisioning and repair minimum QoS standards more challenging for Openreach. We undertook analysis to understand how material this issue is likely to be over the 2026-31 review period.<sup>70</sup>
- 3.77 This analysis showed that:
- a) Historically the provisioning performance for FTTC has not been lower in rural areas compared to urban areas.
  - b) Historically the on-time repair performance has been slightly lower in rural areas (84%) than urban areas (88%). This four-percentage point difference in performance suggests that on average, we might expect the on-time repair performance to decrease by approximately one percentage point (e.g. from 87% to 86%) every time the proportion of rural customers increases by about 25 percentage points (e.g. from 25% to 50%).

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<sup>68</sup> See Annex 9. Table A9.6.

<sup>69</sup> Rural areas have slightly lower performance than urban areas across the UK. Annex 9. Figure A9.16.

<sup>70</sup> Annex 9. Paragraphs A9.42 to A9.53.

- 3.78 Across the UK, 18% of Openreach’s FTTC repairs are rural. Holding constant Openreach’s urban and rural repairs performance, 80% of Openreach’s repairs would have to be rural before Openreach failed on its on-time repair QoS standard.
- 3.79 Overall, we consider that there is likely to be some impact from the increasing rurality of FTTC customers, but its impact on the ability of Openreach to meet minimum FTTC QoS standards appears to be relatively small, and we have decided not to make any specific change to our regulatory approach on this basis.

### Minimum QoS standards for FTTC and MPF products

- 3.80 As set out above, we have decided to retain all minimum QoS standards for FTTC and MPF products.
- 3.81 We have decided to remove the requirement to meet minimum FTTC and MPF QoS standards in each UK management region.

**Table 3.2: Minimum QoS standards for FTTC and MPF products**

Standard	Level
Repair within 2 working days (SML1)	85%
Repair within 1 working day (SML2)	
Repair within 7 working days (SML1)	97%
Repair within 6 working days (SML2)	
Installations to be completed by Committed Date	94%
First Available Date (FAD) for installations requiring an engineer visit - working days within which first date offered for installation appointments	10 days
Quality standards in relation to the FAD - Frequency with which regulated installation appointment date must be offered	89%

### Minimum QoS standards for FTTP in WLA Area 3

- 3.82 Below we first consider how FTTP QoS in WLA Area 3 should be assessed i.e. what metrics or measures should be subject to minimum standards. We then consider the level of those minimum standards for FTTP repairs and for FTTP provisioning.
- 3.83 As discussed above, we have decided to set these QoS standards to provide a ‘backstop’ protection based on existing performance.<sup>71</sup>

### Metrics used for the minimum QoS standards

#### Our proposals

- 3.84 We proposed to set minimum QoS standards for FTTP in WLA Area 3 on the same metrics that we use for FTTC and MPF.

<sup>71</sup> See paragraph 3.62.

### Stakeholder responses

3.85 Sky proposed that we additionally set a standard on ‘Recovery of delayed provisions’, i.e. a standard on the proportion of provisions completed within 1 week of the CCD.<sup>72</sup> However, Sky did not provide information on why we should set a standard on this metric for FTTP or the level at which any standard would be set.

### Our reasoning and decisions

3.86 We have decided to set minimum QoS standards for FTTP in WLA Area 3 on the same metrics that we use for FTTC and MPF. This creates consistency with existing practice, and we think it is most appropriate to introduce minimum QoS standards that ensure Openreach customers are able to rely on the contractual expectations in their SLAs. Openreach agreed with this approach.<sup>73</sup>

3.87 We are not setting a standard on Sky’s proposed metric because we do not consider it necessary to add an additional standard, given the existing standards on provisioning provide a strong incentive for Openreach to connect customers by their CCD. We also have KPI data for the metric which Sky has proposed, so we are able to monitor for any deterioration in performance and consider whether further steps may be required in future.<sup>74</sup>

3.88 Given the above, we have decided to set minimum QoS standards on the following metrics for FTTP in Area 3:

- a) The percentage of repairs completed within 1 working day (SML2);<sup>75</sup>
- b) The percentage of repairs completed within 11 working days (SML2);<sup>76</sup>
- c) The percentage of installations completed by the Committed Date;<sup>77</sup>
- d) For installations requiring an engineer visit, the percentage of installations where the first date offered for an installation appointments was within a certain timeframe.<sup>78</sup>

3.89 Across the next subsections we set out the levels we have chosen for these standards, why we made those decisions, and how we considered the consultation responses that we received. We do this first for the repair metrics, and then for the provisioning metrics.

### FTTP on time repair (within 1 working day)

#### Our proposals

3.90 In our March 2025 Consultation, we identified three options for the methodology we could use to set FTTP minimum QoS standards:<sup>79</sup>

<sup>72</sup> Sky response to TAR26 March 2025 Consultation. Paragraph 133.

<sup>73</sup> Openreach response to TAR26 March 2025 Consultation. Document 5. Paragraph 38.

<sup>74</sup> FTTP- KPI 2d Percentage installation completion. The percentage of all Completed Orders that were completed during the relevant month by five Working Days beyond the Committed Date.

<sup>75</sup> The technical name of the standard is “Repair within 1 working day (SML2)”.

<sup>76</sup> The technical name of the standard is “Repair within 11 working days (SML2)”.

<sup>77</sup> The technical name of the standard is “Installations to be completed by Committed Date”.

<sup>78</sup> This involves setting two standards, one which sets the timeframe and one that sets the percentage level. The technical names of these standards are “First Available Date (FAD) for installations requiring an engineer visit - working days within which first date offered for installation appointments.” And “Quality standards in relation to the FAD - Frequency with which regulated installation appointment date must be offered”.

<sup>79</sup> Ofcom. March 2025. [Consultation: Promoting competition and investment in fibre networks: Telecoms Access Review 2026-31](#). Volume 5. Table 3.3. Options set out in the consultation refer to 2023/24 data. We have updated the options here to reflect the fact that we now use 2024/25 data. See Table 3.3.

- a) Option 1: Openreach's average performance over 2024/25 in WLA Area 3;
- b) Option 2: Openreach's performance in WLA Area 2 over 2024/25 with an adjustment to reflect the rurality of WLA Area 3; and
- c) Option 3: Openreach's average performance over 2024/25 nationally.

- 3.91 We proposed Option 2 as it is consistent with customers in WLA Area 3 receiving the same performance as customers in WLA Area 2 when they have the same level of rurality and because we were unaware of other factors that would imply additional performance differences between the two areas. We wanted to reduce the risk of Openreach providing a lower level of performance in WLA Area 3 due to the weaker competitive pressures from other networks than present in WLA Area 2.
- 3.92 As using Option 2 would have likely required Openreach to increase the proportion of repairs that were repaired within one working day we proposed to commence the minimum QoS standard from 2027/28 to allow Openreach time to make any performance improvement required.
- 3.93 Using Openreach's actual 2023/24 performance data would have set a minimum standard of 79% under Option 2 (which we presented in the March 2025 Consultation), however we planned to update the standard using 2024/25 data to take account of the upward trend in FTTP performance.<sup>80</sup>

#### Stakeholder responses

- 3.94 Stakeholders supported basing the standards on Openreach's performance in the most recent full year (2024/25) as a starting point.<sup>81</sup>
- 3.95 Openreach proposed that we should use Openreach's average performance in WLA Area 3 as the basis for the on-time repair standard. This is the methodology outlined in Option 1 in the consultation.<sup>82</sup>
- 3.96 Openreach suggested that differences in performance between WLA Area 2 and WLA Area 3 are due to differences in geography and network architecture not captured in the rurality data we had analysed for the purposes of Option 2. Most significantly, Openreach submitted that approximately 4 percentage points of the observed 5 percentage point difference between Option 1 and Option 2 in the March 2025 Consultation is due to a greater propensity for repairs in rural areas in WLA Area 3 to be complex compared to repairs in rural areas in WLA Area 2.<sup>83</sup>
- 3.97 Openreach also said that when setting the repair standards we need to take into account the impact of force majeure/MBORC events using either a fixed allowance or excluding MBORC events from future QoS calculations on a case-by-case basis.<sup>84 85</sup>

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<sup>80</sup> This figure was computed using the proposed WLA Area 2 and WLA Area 3 market definitions from the March 2025 Consultation. Ofcom. March 2025. [Consultation: Promoting competition and investment in fibre networks: Telecoms Access Review 2026-31](#). Schedule 2 WLA postcode sectors.

<sup>81</sup> [VodafoneThree](#) response to TAR26 March 2025 Consultation. Section 2. Paragraph 25. [Openreach](#) response to TAR26 March 2025 Consultation. Document 5. Paragraph 93 i.

<sup>82</sup> Ofcom. March 2025. [Consultation: Promoting competition and investment in fibre networks: Telecoms Access Review 2026-31](#). Volume 5. Table 3.2.

<sup>83</sup> [Openreach](#) response to TAR26 March 2025 Consultation. Document 5. Paragraph 56.

<sup>84</sup> Openreach can declare MBORC (Matters Beyond Our Reasonable Control) in specific circumstances where its normal operational abilities are affected by force majeure events.

<sup>85</sup> [Openreach](#) response to TAR26 March 2025 Consultation. Document 5. Paragraph 69.

- 3.98 Finally, Openreach suggested an additional ‘allowance’ of 2 percentage points for next-day repair and 1 percentage point for next-day plus-10-repair to account for the impact of rolling out FTTP to increasingly hard to serve premises.<sup>86</sup>
- 3.99 Sky and Consumer Scotland both proposed alternative higher levels for FTTP minimum QoS standards, though did not provide specific information on how those alternatives had been calculated.<sup>87</sup>
- 3.100 Some stakeholders also questioned our proposal to introduce minimum standards from the second year of the review because Openreach would have had another year of experience and delaying the introduction of minimum QoS standards would leave UK consumers unprotected for another year.<sup>88</sup>

### Our reasoning and decisions

#### Methodology for setting the standard for repair within 1 working day

- 3.101 We have decided to calculate FTTP minimum QoS standards using 2024/25 data. This is because:
- a) It uses the most recent Openreach performance data, which allows us to capture the increasing trend in Openreach performance.<sup>89</sup>
  - b) There does not appear to be any particular anomalies in the 2024/25 data that suggest alternative time periods would be more appropriate.
  - c) This approach is supported by stakeholders (see above).
- 3.102 We have decided to set the on-time repair standards using Openreach’s average performance over 2024-25 in WLA Area 3. This method is Option 1 set out in the March 2025 Consultation and is a change from our proposal to use Option 2.<sup>90</sup>
- 3.103 There are two reasons why we have changed our approach.
- 3.104 Firstly, we have carried out some additional analysis in response to Openreach’s submission which suggests that complex repairs are slightly more likely in WLA Area 3 than WLA Area 2. This remains the case even when differences in rurality between the two areas have been accounted for. This means it may be more difficult for Openreach to improve performance in WLA Area 3 than we had considered in the consultation. Therefore, we now consider that using average 2024/25 performance in WLA Area 3 is likely to be a more appropriate method to set the standard for this area.<sup>91</sup>
- 3.105 Secondly, as shown in Table 3.3 the different options we consulted on have a narrower range of values when we use 2024/25 data rather than 2023/24 data. In particular, the difference between Option 1 and Option 2 for next day on-time repair reduces from 5 percentage points to 2 percentage points. Our concern that Option 1 could lead to consumers in WLA Area 3 receiving a materially lower level of performance than they would receive in a WLA Area 2 location with the same geographical characteristics has therefore

<sup>86</sup> [Openreach](#) response to TAR26 March 2025 Consultation. Document 5. Paragraph 90.

<sup>87</sup> [Sky](#) response to TAR26 March 2025 Consultation. Paragraph 133. [Consumer Scotland](#) response to TAR26 March 2025 Consultation. Page 8.

<sup>88</sup> [VodafoneThree](#) response to TAR26 March 2025 Consultation. Section 2. Paragraph 26. [Sky](#) response to TAR26 March 2025 Consultation. Paragraph 133.

<sup>89</sup> See Annex 9. Table A9.7.

<sup>90</sup> Ofcom. March 2025. [Consultation: Promoting competition and investment in fibre networks: Telecoms Access Review 2026-31](#). Volume 5. Table 3.3.

<sup>91</sup> For further information on this, see Annex 9. Paragraphs A9.55 – A9.63.

been reduced. This effect in combination with the new analysis which shows any difference may be at least in part due to differences in the likelihood of complex repairs, means we consider it more appropriate to use Option 1 to set the on-time repair standards.

**Table 3.3: WLA Area 3 FTTP on-time repair options (Repair within 1 working day)**

Option	2023/24 data (the figures presented in the March 2025 Consultation)	2024/25 data
<b>Option 1 (low):</b> Openreach's average performance in WLA Area 3	74%	81%
<b>Option 2 (medium):</b> Openreach's performance in WLA Area 2 which matches the rurality of WLA Area 3	79%	83%
<b>Option 3 (high):</b> Openreach's average performance nationally	83%	87%

Source: Ofcom analysis of Openreach data. Openreach response dated 14 November 2024 to s135 notice dated 10 July 2024, questions A&B. Openreach response dated 30 May 2025 to s135 notice dated 30 April 2025, questions A&B.<sup>92</sup>

#### Treatment of MBORC events when setting the standard for repair within 1 working day

- 3.106 We have decided not to provide any additional allowance for storm-related MBORC events as suggested by Openreach.
- 3.107 Firstly, consistent with our previous view, we have decided not to exclude MBORC events on 'case-by-case' basis because:<sup>93</sup>
- this reduces the incentive for Openreach to prepare and respond to MBORC events to minimise consumer disruption; and
  - this provides an incentive for Openreach to 'over declare' MBORC, which may increase the need for regulatory oversight to try to counter this.
- 3.108 We have also considered whether Openreach's suggestion of a 'fixed allowance' to take account of MBORC events is appropriate. Our understanding of Openreach's proposed approach to calculating the next-day repair minimum standard is that the impact of two major storms (Darragh and Eowyn) that occurred in 2024/25 should be removed from the Openreach performance data which we use to set the minimum standard (these storms worsened Openreach's actual performance in 2024/25 by approximately 2 percentage points). Openreach then proposed to include a fixed allowance of 4 percentage points that is intended to cover the impact of four major storms per year. The effect of this is to reduce the overall QoS standard.

<sup>92</sup> 2023/24 figures are computed using the proposed WLA Area 2 and WLA Area 3 geographic definitions from the March 2025 Consultation, whereas 2024/25 figures are computed WLA Area 2 and WLA Area 3 geographic definitions that we have decided on in this Statement. Ofcom. March 2025. [Consultation: Promoting competition and investment in fibre networks: Telecoms Access Review 2026-31](#). Schedule 2 WLA postcode sectors. Ofcom. March 2026. Statement: Promoting competition and investment in fibre networks: Telecoms Access Review 2026-31. [Schedule 2 WLA postcode sectors](#).

<sup>93</sup> Ofcom. March 2018. [Quality of Service for WLR, MPF and GEA: Statement](#). Paragraph 5.61.

- 3.109 After reviewing the impact of regional MBORC events on Openreach’s performance over the last 4 years we have concluded that an explicit ‘fixed allowance’ for MBORC is unnecessary. Our decision to use historical Openreach performance from 2024/25 data to set minimum QoS standards means that the impact of MBORC events on performance for that year is already captured.
- 3.110 Our analysis shows that 2024/25 has a higher-than-average number of repairs affected by storm related MBORC incidents.<sup>94</sup> We have decided that using data from this period as a historical baseline (and including the impact from MBORC events) is therefore sufficient to reflect the potential for storm related MBORC events. Openreach’s proposal to assume four major storms equivalent to Darragh and Eowyn appears to be significantly higher than any historical precedent.<sup>95</sup> Although there is always risk that a particular year may have an abnormally high impact from storms, a risk of this type can never be fully eliminated while also having a sufficiently high minimum QoS standard to meaningfully affect Openreach’s performance incentives.<sup>96</sup> Therefore, we think our approach is balanced and appropriate.
- 3.111 Using observed historical performance to set the standard also means that we do not consider it is appropriate for FTTP to apply the FTTC approach of excluding the performance of repair orders in up to two regions where a regional MBORC declaration is in place.<sup>97</sup> This would weaken the performance standard to an extent that we do not consider is warranted, given the impact of MBORC are already contained in the observed 2024/25 performance.
- 3.112 Openreach did not provide any evidence that it experienced material non-storm related regional MBORC declarations. Therefore, we have also not provided an adjustment to minimum QoS standards to take account of regional MBORC declarations that were not related to storms.

[Whether to include an adjustment for hard to serve properties when setting the standard for repair within 1 working day](#)

- 3.113 We have decided not to include an additional allowance for increasing numbers of hard to serve properties.
- 3.114 We have received limited evidence on the extent to which there is an increase in the proportion of properties for which repairs are harder, the reasons why this might occur, and the materiality of any impact on performance. We have also reviewed Connected Nations data which shows that the premises covered by Openreach’s FTTP network during the next 3 years do not appear to be getting more rural.<sup>98</sup> Data from Openreach also shows that provisions and repairs have been getting slightly less rural over the WFTMR 2021-26 period.<sup>99</sup>
- 3.115 Another reason for not including an additional allowance for hard to service premises is that it would be selective. There could also be various other difficult to quantify factors that could potentially affect performance, in different directions, over the next review period.

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<sup>94</sup> See Annex 9. Paragraphs A9.68 - A9.72.

<sup>95</sup> We compared the number of days impacted by all Met Office named storms each quarter with the number of regional MBORC related repairs and found a limited correlation between the two. This implies that it is not just the number of major storms that drives MBORCs but how disruptive each individual storm is.

<sup>96</sup> We refer to the position set out in paragraph 2.11 on taking account of exceptional circumstances.

<sup>97</sup> Volume 7. Part E. Schedule 3. Direction 3. Paragraph 13 (a).

<sup>98</sup> See Annex 9. Figure A9.22.

<sup>99</sup> See Annex 9. Figure A9.21.

For example, we expect that Openreach will continue to improve its repair and provisioning performance as it continues to get more experience with operating a FTTP network.<sup>100</sup> These ‘efficiency gains’ may potentially outweigh any impact from increasingly hard to serve properties.

#### Use of higher standards

3.116 We have decided not to introduce higher standards as suggested above by Sky and Consumer Scotland. We consider that any increase in the standards that exceeds existing Openreach performance is likely to be inconsistent with our intention for these standards to act as a backstop against any future deterioration in performance.

#### Start date of minimum QoS standards

3.117 We have also decided to commence the minimum QoS standards in the year 2026/27 (i.e. from the start of the review period).

3.118 We previously proposed to commence standards from the second year of the review period to allow Openreach time to improve performance in WLA Area 3 to a level where it could meet our proposed standard.<sup>101</sup> However, this delay is no longer required because we are now setting standards based on Openreach’s existing performance in WLA Area 3.

#### Final decision on FTTP repair standard (within 1 working day)

3.119 We have therefore decided to set an FTTP repair standard in WLA Area 3 so that 81% of customer repairs are completed within one working day, this standard will start from the 2026/27 financial year.

### FTTP standard for repair within 11 working days

#### Our proposals

3.120 We proposed to set a second on-time repair standard by reference to repairs completed within 11 working days (i.e. SLA +10 days), rather than the SLA +5 day standard that we use for FTTC repairs.<sup>102</sup> We considered that using a SLA +5 day approach would leave too large a proportion of customers unprotected by any repair standard (taking into account Openreach’s existing performance of repairs within SLA +5).

3.121 We proposed to determine the percentage standard using the same approach as described above in relation to the standard for repair within 1 working day; i.e. using Openreach’s performance in WLA Area 2 to set the minimum standard but adjusted to match the rurality of WLA Area 3 (equivalent to Option 2 for repairs within 1 working day). We proposed a minimum standard (96%) on this basis using Openreach’s actual 2023/24 performance data but planned to update the standard using 2024/25 data to take account of the upward trend in FTTP performance.<sup>103</sup>

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<sup>100</sup> FTTP repair performance continues to improve. Annex 9. Figure A9.5. FTTP provisioning has generally improved but weakened in 2025. We consider this is likely to be the impact of increased storms and potentially an impact from the CJO process. Annex 9. Figure A9.7.

<sup>101</sup> Ofcom. March 2025. [Consultation: Promoting competition and investment in fibre networks: Telecoms Access Review 2026-31](#). Volume 5. Paragraph 3.74-3.75.

<sup>102</sup> In its QoS related FTTC and FTTP SLAs, Openreach targets fixing repairs by the end of the next working day. SLA +5 working days is therefore the same as within 6 working days and SLA +10 working days is the same as within 11 working days.

<sup>103</sup> The 96% figure was computed using the proposed WLA Area 2 and WLA Area 3 geographic definitions from the March 2025 Consultation. Ofcom. March 2025. [Consultation: Promoting competition and investment in fibre networks: Telecoms Access Review 2026-31](#). Schedule 2 WLA postcode sectors.

3.122 We proposed to commence this minimum QoS standard from 2027/28.

#### Stakeholder responses

- 3.123 No stakeholders responded specifically on our proposal to use an SLA +10 days standard rather than the SLA +5 days standard that we use for legacy copper-based services.
- 3.124 Most stakeholders did not respond specifically on our proposals for setting the percentage standard. However, several stakeholders made submissions more generally on our approach to on-time repair standards (including both repair within 1 working day and repair within 11 working days standards) which are described above and are also relevant here.
- 3.125 Openreach suggest a 'fixed MBORC allowance' should be made for the repair within 11 working days standard and an additional 1 percentage point allowance to account for the for the impact of rolling out FTTP to increasingly hard to serve premises.<sup>104 105</sup>

#### Our reasoning and decisions

- 3.126 We have decided that the minimum QoS standard will be based on SLA +10 days (i.e. repair within 11 working days). We have also decided to use 2024/25 data to set the standard, for the same reasons as set out in relation to the repair within 1 working day standard.
- 3.127 We have decided that it will be based on the existing performance of Openreach in WLA Area 3 (i.e. Option 1 described above). This change from the consultation is consistent with our approach above and is due to our updated view that the number of complex repairs is another factor (in addition to rurality) that is likely to result in a lower performance in WLA Area 3 compared to WLA Area 2.
- 3.128 Using this approach, a SLA +10 days standard would be met by 96% of customers.<sup>106</sup> We consider that this is an appropriate proportion of customers that would be protected by this measure, given our intention is to set a standard which covers a significant proportion of repairs that go on longer than the SLA timeframe. This ensures that there continues to be an incentive for Openreach to complete the repair as quickly as possible. Protecting 96% of customers is also consistent with the level proposed in the March 2025 Consultation and on which we did not receive any stakeholder comments.
- 3.129 Also consistent with our approach for repair within 1 day, we have not provided a fixed MBORC allowance. As described above, the 2024/25 data on which we base the standard has a higher-than-average number of repairs affected by storm related MBORC incidents and therefore we consider any additional allowance is unnecessary.
- 3.130 Similarly, we have not provided an additional allowance to take account of properties becoming harder to serve. As described above, the evidence does not suggest that properties are becoming more rural, and we have not received any other information which suggests properties are becoming more difficult to serve.
- 3.131 We have therefore decided to set an FTTP repair standard in WLA Area 3 so that 96% of customer repairs are completed within a period of SLA +10 days. Consistent with the approach outlined above, this standard will also now start from the 2026/27 financial year.

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<sup>104</sup> [Openreach](#) response to TAR26 March 2025 Consultation. Document 5. Paragraph 83.

<sup>105</sup> [Openreach](#) response to TAR26 March 2025 Consultation. Document 5. Paragraph 90.

<sup>106</sup> See Annex 9. Table A9.8

## Standards for FTTP provisioning

### Our proposals

- 3.132 We proposed to set a minimum standard for on-time FTTP provisioning in WLA Area 3 of 91% based on Openreach's existing performance across the UK using 2023/24 data. There was only a small difference between the existing performance of Openreach in WLA Area 2 and WLA Area 3.
- 3.133 We also proposed that the required FAD for installations requiring an engineer visit should be 18 working days and that this should be offered 90% of the time.

### Stakeholder responses

- 3.134 Openreach was the only stakeholder to specifically comment on the proposed level of provisioning standards. It estimated that the difference in FTTP on-time provisioning performance between WLA Area 3 to WLA Area 2 is 1.3 percentage points. It said that this is sufficiently large to warrant the use of WLA Area 3 actual performance to set the minimum standard.<sup>107</sup>
- 3.135 Openreach also proposed several other adjustments that should be included when setting the minimum on-time provisioning QoS standard:
- a) The standard should be reduced by 0.7 of a percentage point due to the impact on performance statistics of its new Customer Journey Optimisation (CJO) process.
  - b) The standard should be reduced by 0.6 of a percentage point to take account of harder to serve properties.
  - c) Any provision orders in areas in which Openreach has declared MBORC should be excluded from the QoS calculations.

### Our reasoning and decisions

- 3.136 We have decided to set a standard for on-time provisioning for WLA Area 3 based on Openreach's 2024/25 performance in WLA Area 3.<sup>108</sup> We agree that using performance in WLA Area 3 is more appropriate and there is a sufficient difference between WLA Area 2 and WLA Area 3 to take this approach. This also ensures consistency with our decision to set repair standards based on Openreach's existing performance in WLA Area 3.
- 3.137 We have also decided to adjust the observed performance in WLA Area 3 downwards to take account of Openreach's new CJO process. The CJO process was rolled out nationwide in March 2025 and so it is not fully included in the 2024/25 performance data.<sup>109</sup>
- 3.138 The CJO process increases the number of consumers who get a committed date for connection on the day that they place the order. This improves the experience for some consumers, but also slightly increases the number of provisions where the committed date is not met.<sup>110</sup>

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<sup>107</sup> [Openreach](#) response to TAR26 March 2025 Consultation. Document 5. Paragraph 97.

<sup>108</sup> i.e. Installations to be completed by Committed Date.

<sup>109</sup> Openreach response dated 4 September 2025 to s135 notice dated 13 Aug 2025, question 9.

<sup>110</sup> For example, approximately 10% of consumers are now given a committed date at the point of order under CJO, when previously they would have had to wait and go through the KCI2 Assure process. Ofcom analysis of Openreach data. Openreach response dated 4 September 2025 to s135 notice dated 13 Aug 2025, question 2.

- 3.139 Openreach estimated that the CJO process had a 1.4 percentage point impact on performance, but that about half of this is mitigated by changes made to the metric used to assess performance (“The on-time provision adjusted metric”).<sup>111</sup>
- 3.140 We think that our approach to setting the minimum QoS standard should not disincentivise future initiatives of this type or potentially incentivise Openreach to unwind some of the changes that have arisen due to the CJO process. Therefore, we have decided to make a small downwards adjustment to the level of the QoS standard to account for the slightly lower percentage of orders meeting the on-time provisioning standard and which are not captured in the revised metric.
- 3.141 As shown in Annex 9, the precise additional impact not captured by the adjusted metric is uncertain but is likely to be in the region of 1 percentage point.<sup>112</sup>
- 3.142 We have decided not to provide any additional adjustment due to MBORC effects or harder to serve properties for the same reasons given above for the repair metrics.
- 3.143 We have therefore decided to set the minimum standard for on-time provisioning at 89%. This is based on the performance of Openreach in WLA Area 3 in 2024/25 (90%) and a small downward adjustment to take account of the impact of the CJO process.<sup>113</sup>
- 3.144 We have also decided that the required FAD for installations requiring an engineer visit should be 18 working days. This is the number of working days within which a first date must be offered for an installation appointment and is based on Openreach’s existing SLAs.
- 3.145 We are aware that Openreach has agreed with ISPs to provide performance metrics based on a FAD of 15 days. However, we have decided that the minimum QoS standard should continue to be consistent with the current definition set out in the SLA.<sup>114</sup> We encourage Openreach to continuing engaging with ISPs to agree on this and other more challenging performance metrics.
- 3.146 Openreach has an internal ambition that the required FAD for installations (18 working days) should be offered 90% of the time.<sup>115</sup> We have decided that the minimum standard should be set at this level. This would be appropriate and proportionate, because it would act as a backstop to ensure performance does not decrease from current levels.

### Minimum QoS standards for FTTP in WLA Area 3

- 3.147 We have decided to set minimum FTTP QoS standards in WLA Area 3 as shown in Table 3.4.

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<sup>111</sup> Openreach Confidential response to TAR26 March 2025 Consultation. Document 5. Paragraph 109.

<sup>112</sup> Annex 9. Paragraphs A9.84-A9.91. Note that this estimate is higher than was proposed by Openreach in their consultation response, however, this estimate uses more recent data, which shows a greater impact from the CJO process.

<sup>113</sup> Openreach’s FTTP on-time provisioning performance was 90.39% in WLA Area 3 in 2024/25, we allow for a downward adjustment of 1 percentage point. This gives us a figure of 89.39%, which we round to 89%. Ofcom analysis of Openreach s135s to Ofcom. Openreach response dated 30 May 2025 to s135 notice dated 30 April 2025, questions A&B.

<sup>114</sup> Conditions for Generic Ethernet Access Service. [Schedule 4 –Service Level Agreement](#). Accessed 16 February 2026.

<sup>115</sup> Openreach service update for Ofcom. February 2025. Slide 6.

**Table 3.4: Minimum QoS standards for FTTP products in WLA Area 3**

Standard	Level
Repair within 1 working day (SML2)	81%
Repair within 11 working days (SML2)	96%
Installations to be completed by Committed Date	89%
First Available Date (FAD) for installations requiring an engineer visit - working days within which first date offered for installation appointments	18 days
Quality standards in relation to the FAD - Frequency with which regulated installation appointment date must be offered	90%

## Transparency obligations

### Our proposals

- 3.148 We proposed to retain the same transparency obligations as in WFTMR21 for FTTC and MPF products.
- 3.149 We also proposed to retain existing KPI obligations for FTTP. However, we proposed to require them to be provided separately for WLA Area 2 and WLA Area 3 and as a UK wide value.

### Stakeholder responses

- 3.150 PXC and the Scottish Government said that we should track standards in WLA Area 2 over time with the provision of separate KPIs for WLA Area 2 and WLA Area 3, and those should be published or regularly reported on by Ofcom.<sup>116</sup>
- 3.151 VodafoneThree suggested that we should set transparency metrics specifically for complex orders that mirror the KPIs in place for FTTP in general.<sup>117</sup> It said that this will provide the necessary incentives for Openreach to set realistic expectations for provisioning and enable it to track process improvements.

### Our reasoning and decisions

- 3.152 We have decided to retain the same transparency obligations as in WFTMR21 for FTTC and MPF products. We consider the existing metrics have helped us understand how Openreach performance is tracking over time. This information allows us to understand whether further regulation or removal of regulation would be appropriate.
- 3.153 For these same reasons, we have also decided to retain existing KPI obligations for FTTP. However, we have decided to require them separately for WLA Area 2 and WLA Area 3 and as a UK wide value. This is so we can evaluate any differences that could result from the difference in regulatory approach or competitive conditions in WLA Area 2 and WLA Area 3.
- 3.154 We have decided not to impose requirements on Openreach to provide additional FTTP KPIs which provide transparency of its performance in relation to more complex installations.

<sup>116</sup> [PXC](#) response to TAR26 March 2025 Consultation. Paragraph 2.35. [Scottish Government](#) response to TAR26 March 2025 Consultation. Page 3.

<sup>117</sup> [VodafoneThree](#) response to TAR26 March 2025 Consultation. Paragraph 31.

- 3.155 We recognise that some complex orders can be frustrating for consumers. As mentioned above, Openreach is also already providing additional performance metrics agreed with industry via the OTA2 forum, which go beyond any regulatory requirement.<sup>118</sup> We encourage Openreach customers to raise suggested performance metrics as part of this process in the first instance.

## Other issues raised by stakeholders

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### Updating the minimum QoS standards during the review period

#### Stakeholder views

- 3.156 There are different views on the extent to which we might update or reassess QoS standards during the review period.
- 3.157 VodafoneThree suggested there needs to be a checkpoint in April 2028 to raise the minimum standards in line with relevant performance levels and consumer expectations at that time.<sup>119</sup> Consumer Scotland suggested the Ofcom commits to a specific review process which could include an annual check on process.<sup>120</sup>
- 3.158 Conversely, VMO2 said that it is pleased that we are reviewing QoS conditions as part of the Access Review, rather than mid-period.<sup>121</sup>

#### Our view

- 3.159 We do not consider that it is necessary to specify in advance any future QoS update process during the review period and at this stage we do not expect to update standards during the review period. We will regularly receive KPIs from Openreach over the period and monitoring that information will allow us to review and intervene where necessary, as well as respond to any concerns raised by stakeholders. This flexibility will allow us to assess any QoS concerns during the review period, as and when they arise.

### Split QoS standards for business and residential consumers

#### Stakeholder views

- 3.160 FCS said that we should separate QoS minimum standards into business and residential measures. It said that as business installations are more complex, Openreach may choose to focus on residential ones at the expense of business ones.<sup>122</sup>

#### Our view

- 3.161 We do not think it is appropriate to split metrics for business and residential consumers. We recognise that there is likely to be a natural incentive to focus on easier orders over harder ones. However, a separate business metric based on existing Openreach performance would need to be set at a lower level and may not lead to an additional

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<sup>118</sup> See paragraph 3.48.

<sup>119</sup> [VodafoneThree](#) response to TAR26 March 2025 Consultation. Section 2. Paragraph 27.

<sup>120</sup> [Consumer Scotland](#) response to TAR26 March 2025 Consultation. Page 8.

<sup>121</sup> [Virgin Media O2](#) response to TAR26 March 2025 Consultation. Page 56.

<sup>122</sup> [FCS](#) response to TAR26 March 2025 Consultation. Page 3.

performance improvement. Depending on the level set, it could also lead to a focus on complex business installations over complex residential installations.

## Availability targets

### Stakeholder views

- 3.162 The Communications Consumer Panel and ACOD suggested that there should be ‘availability’ targets for VoIP and FTTP and that these should be consistent with historical targets for PSTN and copper broadband.<sup>123</sup>

### Our view

- 3.163 We have interpreted ‘availability’ to mean the probability or percentage of time a network or service is operational and capable of performing its intended function when needed. For clarity, below we instead use the term ‘network reliability’.
- 3.164 Our approach to setting QoS standards focuses on giving greater certainty to access seekers that the SLAs we require Openreach to specify in its relevant reference offer for network access, will be the levels of service that Openreach delivers for them most of the time.
- 3.165 Repair performance aside, we are not aware of any wider issue with FTTP network reliability.<sup>124</sup> Whilst overall harm from faults is a function of fault rate as well as repair time, it is not evident that there is a current concern given the rollout of new and much more reliable fibre networks and declining reliance on Openreach as the dominant provider as network competition emerges. In areas where reliance on Openreach is likely to persist, we consider that setting backstop QoS standards on its repair performance to be sufficient to address competition concerns and harm.

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<sup>123</sup> [Communications Consumer Panel and ACOD](#) response to TAR26 March 2025 Consultation. Page 2.

<sup>124</sup> We do not require Openreach to provide VoIP services.

## 4. QoS regulation in LLA and IEC markets

- 4.1 This section sets out our decisions relating specifically to QoS regulation in those LLA and IEC markets where we find that BT has SMP, including transitional arrangements for DFA in postcode sectors that have been reclassified from LLA Area 3 to other regulated LLA markets. The QoS regulation also applies for a transitional period in the IEC BT+2 markets we are deregulating in this review.<sup>125</sup>
- 4.2 For the reasons set out in Section 2 of this volume, we have decided to continue to impose an SMP condition requiring BT to comply with all such QoS requirements as we may direct in relation to network access provided by BT and to publish information about the QoS it provides as we may direct.
- 4.3 In LLA and IEC markets, the Openreach products we are principally concerned with in relation to QoS are:<sup>126</sup>
- Ethernet services – Openreach’s ethernet access direct (EAD) and ethernet backhaul direct (EBD) products;<sup>127</sup>
  - Wave division multiplex (WDM) services – Openreach’s optical spectrum access (OSA) and optical spectrum extended access (OSEA) products;<sup>128</sup>
  - Dark fibre services – Openreach’s products of the same name;<sup>129</sup> and
  - Cablelink services – Openreach’s products of the same name.<sup>130</sup>
- 4.4 We set minimum QoS standards and/or transparency and reporting obligations on these products in the WFTMR21.<sup>131</sup> They apply or relate to Openreach’s performance in installing these products in response to orders placed by its wholesale customers and to its performance in repairing reported faults.
- 4.5 We start by setting out our review of Openreach’s performance since the WFTMR21 followed by our decisions on the overarching approach to QoS regulation in these markets over the 2026-31 period. We then set out the minimum QoS standards we have decided to impose on BT and our reasoning followed by our decision on transparency and reporting requirements.

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<sup>125</sup> Volume 3. Section 8. Paragraphs 8.86-8.98.

<sup>126</sup> These being products which Openreach supplies to comply with its network access obligations.

<sup>127</sup> More detail on Openreach’s ethernet products can be found on its [website](#). Accessed 28 November 2025.

<sup>128</sup> Further detail on WDM products can be found on Openreach’s [website](#). Accessed 28 November 2025.

<sup>129</sup> Openreach’s dark fibre products can be found on its [website](#) under passive products. Accessed 28 November 2025.

<sup>130</sup> More detail on Cablelink products can be found on Openreach’s [website](#) under exchange-based products. Accessed 28 November 2025.

<sup>131</sup> Ofcom. 18 March 2021. [Promoting competition and investment in fibre networks: Wholesale Fixed Telecoms Market Review 2021-2026. Volume 7: Legal instruments](#). Notification of Directions to BT under section 49 of the Communications Act 2003 and SMP Condition 10 (Quality of Service Directions). Schedule 1, Direction 1 and Schedule 2, Direction 2.

- 4.6 Our minimum QoS standards and reporting requirements are unchanged from those we imposed in the WFTMR21 with the exception of an adjustment to the upper percentile limit (UPL).

## Review of Openreach's service performance since the WFTMR21

- 4.7 In the WFTMR21, we imposed the minimum QoS standards set out in Table 4.1 below in relation to ethernet, Cablelink and dark fibre services.<sup>132</sup> These were very similar to the standards we imposed in our previous market review (BCMR 2019). This reflected our then view that existing standards had helped bring Openreach's service quality for installing and repairing ethernet leased lines and dark fibre to a good level and that setting stricter standards was disproportionate.

**Table 4.1 WFTMR21 LLA and IEC QoS standards**

Standard	Level
MTTP (Mean Time To Provide) across orders	No more than 38 working days
Upper percentile limit for provisions (UPL)	No more than 4.5% of orders older than 133 working days
Certainty: Percentage of orders completed on or before the initial contractual delivery date (iCDD)	86%
Certainty cross-link: Maximum mean period for the iCDD	No more than 53 working days
Faults repaired within the service level agreement (SLA)	94%

- 4.8 From 2021-25, Openreach has met all the minimum QoS standards we set, except for during 2022/23 when it contravened the requirement that the MTTP be no more than 38 working days. Openreach's service performance in that year was impacted by eight days of industrial action. It narrowly missed out on meeting this standard, achieving a MTTP of 38.4 working days over the annual compliance period.
- 4.9 We investigated this in 2023 together with misses of other minimum QoS standards that happened in the same year and concluded that three of the minimum QoS standards had been breached.<sup>133</sup> Our decision set out some observations on Openreach's approach that it should learn from but concluded that a fine was not appropriate in this case.<sup>134</sup>

<sup>132</sup> Consistent with decisions in previous market reviews, we did not set minimum QoS standards on Openreach's WDM services in the WFTMR21.

<sup>133</sup> In 2022/23 Openreach also missed a WLA MPF and GEA-FTTC provisions standard in the London and the Southeast region and a WLA SML2 repair standard in the Wales and Midlands region.

<sup>134</sup> Ofcom. March 2024. [Confirmation Decision under section 96C of the Communications Act 2003. Confirmation Decision served on BT by Ofcom for the contravention of SMP Condition 10.1.](#)

- 4.10 We require Openreach to submit monthly KPIs and a biannual report on orders which take more than 133 working days to complete. This information allows us to monitor Openreach’s service performance in some detail and is not limited to just checking performance against our minimum QoS standards. We also require Openreach to publish a subset of its KPIs on its website quarterly.<sup>135</sup>
- 4.11 In Annex 9, we set out our assessment of Openreach’s performance over the period August 2021 to December 2025. During this period overall demand for ethernet provisions has dropped by around [3<]%.<sup>136</sup>
- 4.12 In summary, since the period impacted by industrial action, Openreach performance has been generally improving relative to our minimum QoS standards. Openreach’s performance in the first three quarters of 2025/26 shows that it is meeting the QoS standard for MTTP, Certainty cross-link and Faults repaired within the SLA. Both the Certainty and UPL performance standards fell during the first half of 2025/26, and improved in October, November and December 2025. For the Certainty performance this improvement was significant and the average performance in the period April – December 2025 was just above the required minimum annual level. However, the UPL standard improvement was less significant and the average performance across the same period does not meet the annual standard. Openreach has also told us that it anticipates missing the UPL standard for the 2025/26 financial year and has made an additional submission on the issue.<sup>137</sup> This is discussed later in this section.
- 4.13 In 2023, we consulted on a proposal to change the current on-time fault repair standard to a mean time to repair (MTTR) metric but decided not to proceed after having considered consultation responses.<sup>138</sup> We said we would consider what fault repair standard is appropriate in this review and we discuss this below.

## Overarching approach to QoS regulation

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### Our proposals

- 4.14 In the March 2025 Consultation, we proposed retaining minimum QoS standards on Openreach in LLA Area 2 as well as LLA Area 3 and not introducing minimum QoS standards in the HNR Area. We also proposed to retain minimum QoS standards for IEC services in BT Only and BT+1 exchanges. We did not propose to introduce stricter standards than in the WFTMR21. These proposals took into account the impact of exchange exit and the planned introduction of EAD2.0.

### Stakeholder responses

- 4.15 We did not receive stakeholder responses questioning our overall approach. Responses focussed on the specific remedies which we discuss further below.

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<sup>135</sup> See Openreach. [Our Key Performance Indicators](#) (larger businesses). Accessed 20 January 2026.

<sup>136</sup> The monthly number of LLA orders received has fallen from just over [3<] at the end of 2021 to just below [3<] at the end of 2025. Ofcom analysis of Openreach reports to Ofcom. WFTMR Leased Line KPI Report – December 2025. KPI (j).

<sup>137</sup> [Openreach](#) further response to TAR26 March 2025 Consultation. Ethernet Tails QoS. Page 2.

<sup>138</sup> Ofcom. October 2023. [Quality of Service for Ethernet and Dark Fibre. Statement on proposed modifications to Quality of Service Directions and related Key Performance Indicators for Ethernet and Dark Fibre repairs.](#)

- 4.16 PXC and VodafoneThree said that they saw no reason to change the minimum QoS standards.<sup>139</sup> They said that Openreach still has SMP in these markets and minimum QoS standards are needed to ensure it does not have an incentive to reduce service quality.

## Decisions and reasoning

- 4.17 In this subsection, we consider whether any changes are appropriate to the existing arrangements for regulating QoS in LLA and IEC markets, given our assessment of the WFTMR21 review period.

### Whether to set minimum QoS standards

- 4.18 We have separated the LLA market into separate geographic areas depending on the extent to which there is the potential for material and sustainable network competition.<sup>140</sup> Our regulatory objectives differ in each area.
- 4.19 In recent reviews, including the WFTMR21, we have reflected these geographic distinctions in competitive conditions through the exercise of our regulatory judgement in maintaining QoS standards in LLA Area 2 as well as LLA Area 3 but not in the HNR Area.<sup>141</sup>
- 4.20 Looking ahead for this review period, we continue to consider that it is appropriate and proportionate to retain minimum QoS standards on Openreach in LLA Area 2 as well as LLA Area 3:
- a) While we think there is, or there is the potential for, material and sustainable competition to develop in LLA Area 2, we think it is necessary to provide protection for customers and existing models of competition from poor QoS while that develops.
  - b) We do not consider that LLA Area 3 is likely to have the potential for material and sustainable network competition to emerge, and so minimum QoS standards are necessary to promote competition based on access to Openreach's network and to protect leased line customers.
- 4.21 To ensure that Openreach maintains adequate levels of QoS performance going forward, we have decided to retain a full package of QoS remedies across its main network access products. We discuss the details of these remedies below.
- 4.22 In the WFTMR21, we decided to continue not to impose QoS standards in the HNR Area despite finding that BT has SMP in this market.<sup>142</sup> We reasoned that there was less need for QoS regulation given the more competitive market conditions in the HNR Area than in LLA Area 2 and LLA Area 3.<sup>143</sup>
- 4.23 We have decided to continue not imposing minimum QoS standards in the HNR Area for the same reasons as we have taken in previous reviews. Given the market conditions, Openreach has less incentive to allow its QoS to deteriorate significantly as its wholesale customers have more opportunities to switch to other networks which are present in this area.

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<sup>139</sup> [PXC](#) response to TAR26 March 2025 Consultation. Paragraph 3.15; [VodafoneThree](#) response to TAR26 March 2025 Consultation. Paragraphs 33-37.

<sup>140</sup> Volume 2, Section 5.

<sup>141</sup> All other QoS remedies apply in both markets.

<sup>142</sup> A decision we first made in the [2019 BCMR Statement](#).

<sup>143</sup> Ofcom. 28 February 2020. [Promoting competition and investment in fibre networks: Wholesale Fixed Telecoms Market Review 2021-26. Volume 3: Non-pricing remedies](#). Paragraph 7.43.

- 4.24 Our overall objectives for the HNR Area are the same as in LLA Area 2, but we are taking a lighter approach to remedies as a whole in the HNR Area. This reflects the fact that network competition is stronger in the HNR Area, and so although there is still a role for regulation as competition develops, the extent of protection necessary for leased line customers and existing models of downstream competition while that develops is lower than in LLA Area 2.
- 4.25 We consider that our competition concerns in this market are adequately addressed by continued monitoring of Openreach service performance in the HNR Area over the 2026-31 period. We have decided to do this by keeping in place the existing reporting obligations. These are additional to the SLA/SLG reference offer obligations and measures addressing discriminatory conduct.
- 4.26 In IEC at BT Only and BT+1 exchanges we want to promote competition based on access to Openreach’s networks and protect consumers. We continue to consider that QoS regulation, including requiring Openreach to comply with minimum QoS standards, is appropriate and proportionate to support this model of competition in these markets.<sup>144</sup>

### Impact of exchange exit

- 4.27 In Volume 3, Section 3, we discuss the impact of exchange exit on the continued provision of network access.
- 4.28 Exchange closure carries the risk of temporary disruption for end-users. In some cases, Openreach will be migrating customers over to new lines to enable exchange exit. At the point of switch over, there may be a risk that there is some downtime for the end-user. This could particularly be impactful for critical national infrastructure, vulnerable consumers or for those who require round the clock connectivity. However, providers and Openreach have incentives to minimise such disruption.
- 4.29 The OTA2 will monitor this aspect of the programme and keep this under review.
- 4.30 We are not altering the QoS standards to reflect exchange exit. Our QoS regulations, including minimum QoS standards, should help maintain incentives on Openreach to ensure that service performance remains at adequate levels as network changes are managed through the exchange exit programme and that its customers are treated equally throughout.

### EAD2.0

- 4.31 Openreach is developing a new ethernet leased line product, currently known as EAD2.0. Since the March 2025 Consultation, Openreach has confirmed that EAD2.0 has been delayed, and the current expected launch is set for December 2026.<sup>145</sup>
- 4.32 We understand that, under current plans, EAD2.0 is intended to be a development of the existing EAD product which has been in service for many years.<sup>146</sup> If this is the case, the new product will be subject to QoS regulation. This is because we define ‘relevant ethernet

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<sup>144</sup> Thereby addressing the competition problems arising from BT’s SMP described in Section 2 of this volume.

<sup>145</sup> [Openreach](#) response to TAR26 March 2025 Consultation. Document 3. Paragraph 416.

<sup>146</sup> Openreach. 26 July 2024. Telecoms Access Review (TAR) 2026. Openreach Submission. Non-Confidential version for publication. Paragraph 219.

services' as inclusive of any new product which is introduced to wholly or substantially replace any of the current EAD, EBD or Cablelink products.<sup>147 148</sup>

- 4.33 As EAD2.0 is currently under development, we do not know what, if any, impact its possible introduction may have on Openreach's service performance over the review period. Whilst we would expect the product to perform better than its predecessor, this does not necessarily mean that our QoS regulations will remain appropriate.
- 4.34 Should evidence be submitted to us in the future which supported the need to modify any QoS directions we have made (whether this relates to the introduction of EAD2.0 or some other factor), then we would consider this carefully and, if appropriate, consult on proposed changes as we have done previously.<sup>149</sup>

## Conclusions

- 4.35 As previously mentioned, apart from the UPL and Certainty standards, Openreach's performance has been improving. MTTP has been reducing i.e., installation orders have taken less time, on average, to complete and repairs completed within the timeframe specified in Openreach's SLA have both been rising. Lastly, the average time it takes Openreach to provide its customers with its iCDD has been reducing.
- 4.36 We recognise that various factors may have led to these better performance outcomes.<sup>150</sup> However, we do not consider that imposing stricter standards for this review period is appropriate or proportionate against a backdrop of broadly rising service quality for customers.
- 4.37 Our view is that there is no evidence that changes are necessary to the way we regulate Openreach's service performance for installing and repairing its main network access products – ethernet and dark fibre. Our decisions on the specific form that this regulation should take are set out in the remainder of this section.

## QoS regulation

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### Minimum QoS standards

#### Our proposals

- 4.38 In our March 2025 Consultation, we proposed to retain the same minimum QoS standards, both the metrics and levels, set in the WFTMR21 for LLA Area 2, LLA Area 3 and the IEC markets.

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<sup>147</sup> Paragraph 9 a (xii) of Direction 1 of the [QoS Directions](#).

<sup>148</sup> See Volume 4, Section 6, Footnote 511, for a description of how we have decided to treat a new EAD 2.0 product for the purpose of the Ethernet Baskets specified in our charge controls.

<sup>149</sup> For example, having imposed minimum QoS standards in 2014, there was a change in the mix of wholesale services purchased from Openreach, which would have reduced the effectiveness of the existing standards. So, in 2016, we used our direction making powers to address this. Ofcom. 19 October 2016. [Quality of Service for WLR and MPF. Directions and Consents relating to the minimum standards and KPIs imposed in the 2014 Fixed Access Market Reviews](#).

<sup>150</sup> For example, operational changes, changes in the mix of job complexity, more manageable and/or predictable demand.

## Stakeholder responses

- 4.39 PXC and VodafoneThree said that they saw no reason to change the minimum QoS standards.<sup>151</sup>
- 4.40 CityFibre said the QoS performance reported could be subject to manipulation by Openreach since it is based on “aggregated service level monitoring.”<sup>152</sup> CityFibre said this could mean that Openreach could provide certain services at lower or higher performance levels. In particular [§<]. It said that setting minimum QoS standards for individual services would better guard against exclusionary behaviour.
- 4.41 Openreach said that it was broadly supportive of our proposal to retain minimum QoS standards for provisioning.<sup>153</sup> An exception was the UPL, which it said is no longer appropriate due to recent market changes (these are discussed in more detail below).<sup>154</sup>
- 4.42 Openreach said that it continues to have concerns with the sensitivity of its performance against the minimum QoS standard for the on-time repair metric and referred to its previous submissions which proposed a change to a MTTR standard and the removal of MBORC repairs from the performance calculation.<sup>155</sup>

## Decisions and reasoning

- 4.43 Openreach’s performance metrics in installing leased lines have generally improved or been maintained since our last review in 2021.<sup>156</sup>
- 4.44 We consider that keeping the same minimum QoS standards, both the metrics and levels, set in WFTMR21 remains an appropriate and proportionate remedy for our competition concerns in relevant LLA and IEC markets for this review period. The only exception is an adjustment to the UPL as explained below.
- 4.45 Table 4.2 below summarises our decisions on minimum QoS standards in LLA and IEC markets for the review period 2026-31.

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<sup>151</sup> [PXC](#) response to TAR26 March 2025 Consultation. Paragraph 3.15; [VodafoneThree](#) response to TAR26 March 2025 Consultation. Paragraphs 33-37.

<sup>152</sup> [CityFibre](#) response to TAR26 March 2025 Consultation. Annex 5. Question 5.3.

<sup>153</sup> [Openreach](#) response to TAR26 March 2025 Consultation. Document 5. Paragraph 139.

<sup>154</sup> [Openreach](#) further response to TAR26 March 2025 Consultation. Ethernet Tails QoS. Page 2-3.

<sup>155</sup> [Openreach](#) response to TAR26 March 2025 Consultation. Document 5. Paragraph 142.

<sup>156</sup> Annex 9. Figures A9.11 - A9.15

**Table 4.2 LLA and IEC minimum QoS standards for 2026-2031**

Standard	Level
Mean Time To Provide (MTTP) across orders	No more than 38 working days
Upper percentile limit for provisions (UPL)	The volume of open orders, which are older than 133 working days, must be no more than the higher of: a) 4.5% of open orders; or b) 550
Certainty: Percentage of orders completed on or before the initial contractual delivery date (iCDD)	86%
Certainty cross-link: Maximum mean period for the iCDD	No more than 53 working days
Faults repaired within the service level agreement (SLA)	94%

#### Use of aggregated rather than product specific standards

- 4.46 We have decided to continue applying an aggregate performance standard for LLA/IEC that covers EAD, EBD and Cablelink services. We do not agree with CityFibre that we should set minimum QoS standards for individual Openreach products.
- 4.47 As with all our standards based on industry-wide averages, there is always a risk that individual or sub-groups of consumers will be subject to lower performance than the average. However, we consider that an aggregate approach is appropriate.
- 4.48 We think the risk of underperformance for the individual products is relatively low, because any underperformance for one product would need to be compensated by a higher performance for another product. We are also able to monitor the performance of individual products as we require Openreach to submit KPIs which show performance by specific products (e.g. Cablelink) including those which are excluded from QoS standards (e.g. WDM). This has allowed us to monitor and investigate performance related to specific products when necessary. [redacted].<sup>157</sup>
- 4.49 The volume of individual products also means that using disaggregated performance for minimum QoS standards could be too volatile. For example, the annual volume of [redacted] provisions is consistently significantly smaller than annual EAD provisions, with [redacted] making up around [redacted]% of all ethernet provisions, compared to EAD making up around [redacted]% of

<sup>157</sup> Ofcom analysis of Openreach reports to Ofcom. WFTMR Leased Line KPI Report – December 2025. Cablelink is the second most prevalent category of leased lines/IEC subject to a minimum QoS standard.

all ethernet provisions.<sup>158 159</sup> These low volumes mean that applying a minimum QoS standard to [X] alone could lead to volatility in performance data and make it harder to understand Openreach's performance. An aggregate approach ensures there are sufficient volumes of provisions and repairs in the calculation so that the year-to-year performance is not at risk of becoming too volatile. We consider that setting a minimum QoS standard on a performance measure that is too volatile is unlikely to be proportionate.

### Repairs

- 4.50 We considered whether it is appropriate to change the standard for Openreach's performance in repairing the services it provides. The existing standard requires Openreach to clear faults in accordance with its contractual service level commitments 94% of the time over an annual compliance period.
- 4.51 In July 2023 we consulted on modifying the minimum QoS standard for repair of ethernet and dark fibre products and associated transparency requirements.<sup>160</sup> This was based on evidence from Openreach that there had been a change in the underlying fault mix. Openreach argued that a decrease in easier to fix faults resulted in more complex faults making up a greater proportion of overall faults, making the existing on-time repair (OTR) standard more challenging and no longer fit for purpose.
- 4.52 Openreach proposed replacing the existing standard with a MTTR metric and that faults caused by MBORC and customer faults should be removed from this standard.
- 4.53 In our subsequent statement, we decided not to make changes to the existing repair standard at that time and said that a more appropriate time to consider this issue would be in this current review.<sup>161</sup>
- 4.54 As we recognised at the time, the merit of an alternative metric of MTTR is to provide some incentive on Openreach to deliver all repairs including the most complex repairs which take longer than the relevant SLAs. However, we also acknowledge concerns from other stakeholders that an MTTR approach may not maintain the same level of incentive to deliver timely repairs as the current OTR standard. It will also be difficult to set the level of a new MTTR metric, particularly knowing whether it is consistent with an equivalent OTR standard. This difficulty increases the risk of us setting an inappropriate standard compared to maintaining the existing standard.
- 4.55 We have reviewed whether the existing OTR metric and level remains a proportionate and appropriate way of ensuring that Openreach performs to the repair service level which we require it to include in its relevant network access reference offer.
- 4.56 We have decided that it is proportionate and appropriate for the following reasons.

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<sup>158</sup> There were around [X] provisions a year for the financial years 2022/23 to 2024/25, whereas there were around [X] EAD provisions and around [X] total ethernet provisions a year over the same time period. Ofcom analysis of Openreach reports to Ofcom. WFTMR Leased Line KPI Report – December 2025.

<sup>159</sup> We recognise that, in principle, this does also mean that any reduction in Openreach's performance in relation to [X] does not have much of an impact on its overall performance against our aggregate metrics.

<sup>160</sup> Ofcom. 14 July 2023. [Quality of Service for Ethernet and Dark Fibre. Proposed modifications to Quality of Service Directions and related Key Performance Indicators for Ethernet and Dark Fibre repairs.](#)

<sup>161</sup> Ofcom. 30 October 2023. [Quality of Service for Ethernet and Dark Fibre. Statement on proposed modifications to Quality of Service Directions and related Key Performance Indicators for Ethernet and Dark Fibre repairs.](#)

Complementing the SLA/SLGs

4.57 Our approach to defining QoS metrics for minimum standards, since we first introduced them a decade or so ago, has been to give greater certainty to access seekers that the SLAs we require Openreach to specify in its relevant reference offer for network access, will be the levels of service that Openreach delivers for them most of the time. Relying on SLGs to provide this certainty had not proved sufficient.

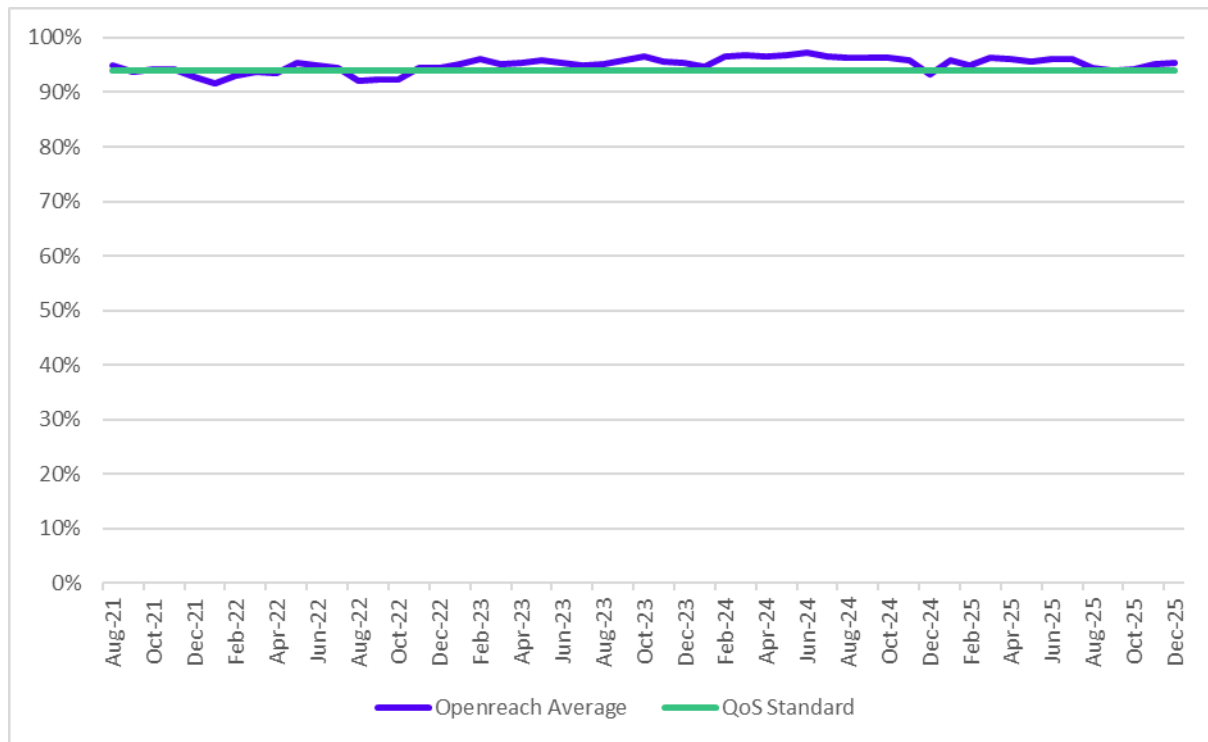
4.58 So, we imposed minimum QoS standards requiring Openreach to perform to its SLAs for key aspects of service performance by setting minimum levels which must be met in aggregate annually. The minimum QoS standards therefore complement our reference offer obligations by covering an OTR metric rather than an MTTR metric.<sup>162</sup>

4.59 We continue to believe this to be an appropriate way of defining QoS metrics.

Actual repair performance

4.60 We set out below in Figure 4.1 Openreach’s performance against the existing repair standard since the WFTMR21. This evidence shows that, since the periods of industrial action in the summer/autumn of 2022, Openreach’s performance has exceeded the monthly equivalent of OTR minimum QoS standard every month apart December 2024.

Figure 4.1: LLA Faults repaired within the service level agreement (SLA)



Source: Ofcom analysis of Openreach reports to Ofcom. WFTMR Leased Line KPI Report – December 2025.

<sup>162</sup> There are a few instances where we have had to deviate from this approach. For example, in setting leased line provisioning standards for the first time in 2016, we found only a small proportion of orders were delivered within the SLA. So, we decided to use MTTP with upper and, initially, lower percentile metrics instead. We also decided that other measures were also appropriate and proportionate to address the then practice whereby Openreach, in many cases, repeatedly changed the contracted date for delivering circuits. Ofcom. April 2016. [Business Connectivity Market Review – Volume I. Review of competition in the provision of leased lines](#). Paragraphs 13.52-13.55 and Table 13.10.

- 4.61 Openreach's performance on this metric improved from the end of industrial action through to the end of 2024. One reason for this improvement was that the percentage of customer faults (i.e., easier to fix faults) had [§<] as of summer 2024.<sup>163</sup>
- 4.62 While we recognise that there is some variation in the type of faults that are included in the metric, we do not consider the impact of this variation is sufficiently material to conclude that the current OTR standard is not appropriate.

#### Customer faults

- 4.63 Removing customer faults would mean that significantly fewer faults would be captured by the repair incentive and could lead to increasing volatility in the output values. We would also need to set the level of a new metric that excludes customer faults. It could be challenging to set this in a way that is consistent with an equivalent standard that includes these faults.

#### MBORC

- 4.64 We also do not think excluding MBORC repairs from the minimum QoS standard, and the subsequent reduction in the risk to Openreach of not meeting the standard, outweighs the benefits of including these repairs. Inclusion of MBORC faults incentivises Openreach to repair these faults in a timely manner, and ensures this category is not used to improve performance by incorrectly categorising faults as MBORC.<sup>164</sup>
- 4.65 In response to Openreach's submission on this, we recognise that inclusion of MBORC repairs in performance metrics mean that Openreach's risk of non-compliance may be impacted to some extent by the frequency of MBORC events in any particular year. However, we consider Openreach is best placed to manage or absorb that risk. Removing MBORC repairs from the QoS performance metric would therefore be inappropriate when considered against the benefits of including them, as outlined previously in Section 3.

#### Conclusion

- 4.66 We consider that the existing OTR standard remains appropriate and proportionate for the purposes of setting a minimum QoS standard for LLA/IEC fault repair and provides the best outcome for consumers.<sup>165</sup>

#### WDM

- 4.67 Consistent with decisions in previous market reviews, we did not set minimum QoS standards on Openreach's WDM services in the WFTMR21.
- 4.68 Our reason then for not doing so was because WDM circuits were quite low in volume and because we did not consider it likely that Openreach would degrade service quality on products which it was actively promoting as having features comparable to dark fibre.<sup>166</sup>

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<sup>163</sup> Openreach. 26 July 2024. Confidential Telecoms Access Review (TAR) 2026 Openreach pre-consultation submission. Page 79. [§<].

<sup>164</sup> We previously identified these benefits in 2023. Ofcom. 30 October 2023. [Quality of Service for Ethernet and Dark Fibre. Statement on proposed modifications to Quality of Service Directions and related Key Performance Indicators for Ethernet and Dark Fibre repairs](#). Paragraph 3.7.

<sup>165</sup> This is not to say that an MTTR metric is not a useful measure of performance.

<sup>166</sup> Ofcom. 28 June 2019. [Promoting competition and investment in fibre networks: review of the physical infrastructure and business connectivity markets. Volume 2: market analysis, SMP findings, and remedies for the Business Connectivity Market Review \(BCMR\)](#). Paragraph 15.146.

- 4.69 Openreach's latest KPIs indicate that the installed base of WDM circuits has increased since WFTMR21. However, the number of WDM circuits remains small compared to the installed base of leased lines circuits and, as a proportion, has not changed much since 2021.<sup>167</sup>
- 4.70 We therefore have decided not to set QoS standards on Openreach's WDM services in this review for the same reasons as before.

## Upper percentile limit (UPL)

- 4.71 We closely monitor Openreach's performance against QoS standards, including its performance against the UPL which has appeared to worsen over recent quarters.<sup>168 169</sup> This standard is intended to protect customers with complex orders, by attempting to limit the number of orders experiencing excessively long lead times. In the March 2025 Consultation, we proposed that the UPL standard should be maintained at the level we set in the WFTMR21 (i.e. no more than 4.5% of orders older than 133 working days).
- 4.72 In October 2025 Openreach made an additional submission stating that, due to recent market changes, the UPL was no longer suitable as a standard for the 2026-31 review period (noting that it forecast missing the UPL in the 2025/26 financial year).<sup>170</sup>
- 4.73 We have assessed the appropriateness of the UPL for the review period and decided to retain the existing QoS minimum standard, but with an adjustment to the way the standard is measured in light of Openreach's submission to account for recent market developments.

## Openreach's recent UPL performance

- 4.74 Historically, Openreach has met the UPL standard, with less than 4.5% of open orders being older than 133 working days old (also known as tail orders) at the end of each month.<sup>171</sup> However, from mid-2024 the percentage of open orders that were tails increased, and between July 2025 to November 2025 the monthly percentage was above the annual limit. This percentage then fell and was at 4.37% in December 2025.<sup>172</sup>

## Stakeholder response

- 4.75 Openreach requested that we adjust the UPL standard to include an alternative measure comprising an absolute limit of open orders.<sup>173 174</sup>

<sup>167</sup> [3.2%] in April 2021 rising to [3.2%] in December 2025. Ofcom analysis of Openreach reports to Ofcom. WFTMR Leased Line KPI Report – December 2025. KPI (r).

<sup>168</sup> 3.2% in July 2024 rising to 4.4% in December 2025. Ofcom analysis of Openreach reports to Ofcom. WFTMR Leased Line KPI Report – December 2025. KPI (H1).

<sup>169</sup> The UPL measure as defined in the WFTMR21 said: The Dominant Provider must ensure that the mean Monthly Upper Percentile Open Orders is no more than 4.5% in each Relevant year.

Where: 'Monthly Upper Percentile Open Orders' means in relation to all Orders that were Accepted Orders but not Completed Orders by the end of the relevant month, the percentage of orders that had they become Completed Orders on the last day of the relevant month, would have had a Time to Provide of more than 133 Working Days. Ofcom. March 2021. [Promoting investment and competition in fibre networks – Wholesale Fixed Telecoms Market Review 2021-26](#). Volume 7. Pages 221 and 224.

<sup>170</sup> [Openreach](#) further response to TAR26 March 2025 Consultation. Ethernet Tails QoS.

<sup>171</sup> Annex 9. Figure A9.12.

<sup>172</sup> Ofcom analysis of Openreach reports to Ofcom. WFTMR Leased Line KPI Report – December 2025. KPI (H1).

<sup>173</sup> Openreach's performance against this standard would still be calculated by averaging end of month figures over the course of each financial year.

<sup>174</sup> [Openreach](#) further response to TAR26 March 2025 Consultation. Ethernet Tails QoS. Page 34.

**Openreach's reasoning**

- 4.76 Openreach highlighted that the UPL standard is composed of two components, the level of the open workstack (the denominator) and the volume of open tail orders (the numerator).<sup>175 176</sup>
- 4.77 Openreach said that since June 2024, due to a combination of circumstances largely outside of its control, and its improved provisioning performance, tail orders (the numerator) had stayed largely constant while the workstack (the denominator) had fallen.<sup>177</sup> Openreach suggested that this is the reason why its performance has decreased and why the existing UPL standard is no longer suitable.<sup>178</sup>
- 4.78 Openreach said that the level of the total QoS applicable open workstack has consistently fallen since mid-2024 and now sits at its lowest point since at least July 2019.<sup>179</sup> The total open QoS applicable workstack was at approximately 16,000 in mid-2024 and sat just under 11,000 in December 2025.<sup>180</sup>
- 4.79 Openreach suggested that its open workstack had fallen because:
- a) it had recently experienced a drop in ethernet demand, particularly on 'easier-to-provide' orders;<sup>181</sup> and
  - b) it had increased the speed at which it delivers some orders meaning that more orders are completed in the same month that they are placed. As the UPL measure is taken at the end of every month, these completed orders are not counted in the end of month UPL calculation.<sup>182</sup>
- 4.80 Openreach also said that demand falling more for 'easier-to-provide' orders, and provisioning times falling especially for less complex orders has meant the number of tail orders has not been falling with overall demand.<sup>183</sup>
- 4.81 Openreach also suggested that it is less able to influence tail orders because 92% of tail orders are impacted by civil works, wayleaves or traffic management problems which it considered to be largely out of its control.<sup>184</sup>

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<sup>175</sup> Openreach's "QoS workstack", "workstack", and "open workstack" all refer to the number of open orders that Openreach has received and are in the process of delivering. Orders are only counted for the products and geographies where QoS regulatory standards apply. [Openreach](#) further response to TAR26 March 2025 Consultation. Leased lines forecasts and trends. Paragraph 3.1.

<sup>176</sup> [Openreach](#) further response to TAR26 March 2025 Consultation. Ethernet Tails QoS. Page 6.

<sup>177</sup> [Openreach](#) further response to TAR26 March 2025 Consultation. Ethernet Tails QoS. Page 2.

<sup>178</sup> [Openreach](#) further response to TAR26 March 2025 Consultation. Ethernet Tails QoS. Page 3.

<sup>179</sup> Openreach's total workstack also includes orders where QoS regulation does not apply (e.g. those in the CLA).

<sup>180</sup> Ofcom analysis of Openreach reports to Ofcom. WFTMR Leased Line KPI Report – December 2025. KPI (H1).

<sup>181</sup> Openreach suggested that this drop was due to increased altnet presence; a weak macroeconomy; and increased substitution to FTTP. [Openreach](#) further response to TAR26 March 2025 Consultation. Ethernet Tails QoS. Paragraph 3.6.

<sup>182</sup> [Openreach](#) further response to TAR26 March 2025 Consultation. Ethernet Tails QoS. Paragraph 3.24.

<sup>183</sup> [Openreach](#) further response to TAR26 March 2025 Consultation. Ethernet Tails QoS. Paragraph 3.22 and

4.2.

<sup>184</sup> [Openreach](#) further response to TAR26 March 2025 Consultation. Ethernet Tails QoS. Table 1.

### Openreach's proposed alternative

- 4.82 Openreach's preferred alternative to the current UPL metric is that the volume of open orders which are older than 133 working days of age at the end of each month must, on average over a year, be no more than the higher of:
- a) 4.5% of open orders; or
  - b) 600 open orders.<sup>185</sup>
- 4.83 Openreach said that this alternative approach would maintain a QoS standard at a level consistent with the WTFMR21 approach.<sup>186</sup>

### Our reasoning and decisions

- 4.84 The UPL standard continues to provide an important protection from excessively long lead times for businesses with complex leased line orders. We have therefore decided to maintain the UPL standard but adjust it to include an additional absolute limit of no more than 550 open orders.
- 4.85 The following subsections provide more detail on our view of these issues.

### Demand and order mix

- 4.86 Overall demand for Openreach's ethernet services decreased by around [X]% from June 2024 to August 2025.<sup>187</sup> Other than some potential short-term effects, a drop in demand by itself would not necessarily mean that Openreach's provisioning performance would be significantly impacted, if the drop in demand affected all types of orders including tail orders. However, as explained below, Openreach's performance in terms of provisions also appears to be changing.
- 4.87 Figure 4.2 shows how the MTTP for Openreach's QoS related ethernet provisions changed between August 2021 and December 2025. This highlights how the MTTP has fallen since Q3 2024/25.

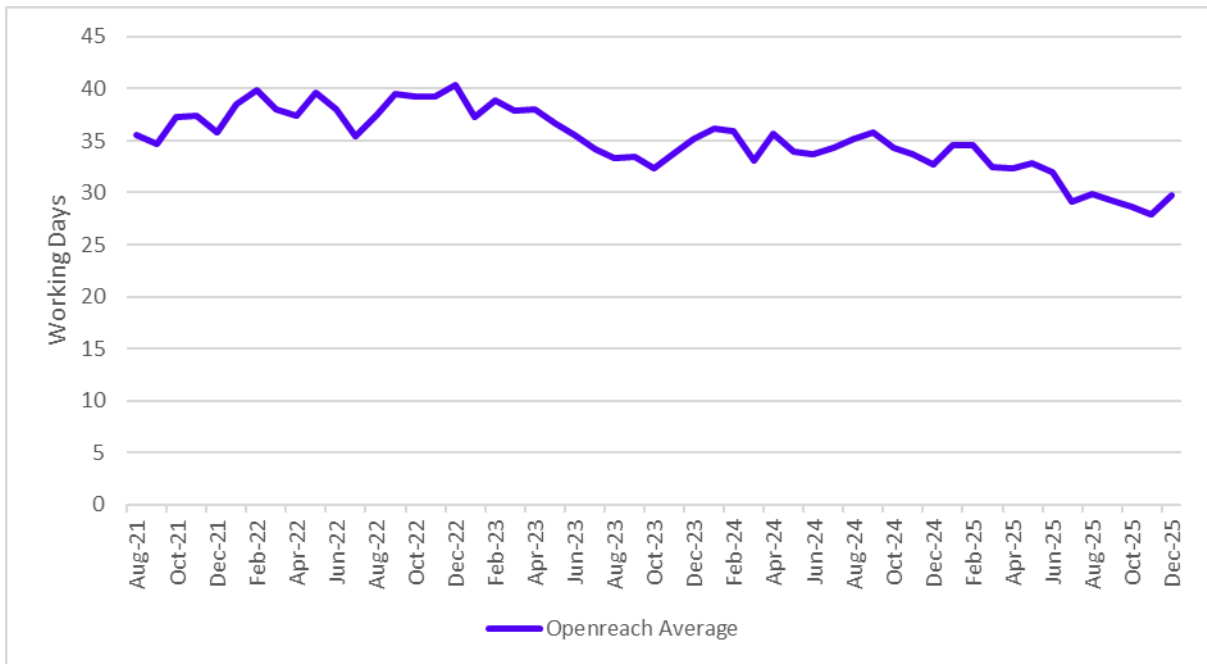
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<sup>185</sup> [Openreach](#) further response to TAR26 March 2025 Consultation. Ethernet Tails QoS. Page 34.

<sup>186</sup> [Openreach](#) further response to TAR26 March 2025 Consultation. Ethernet Tails QoS. Paragraph 5.13.

<sup>187</sup> Openreach further response to TAR26 March 2025 Consultation. Ethernet Tails QoS. Figure 2.

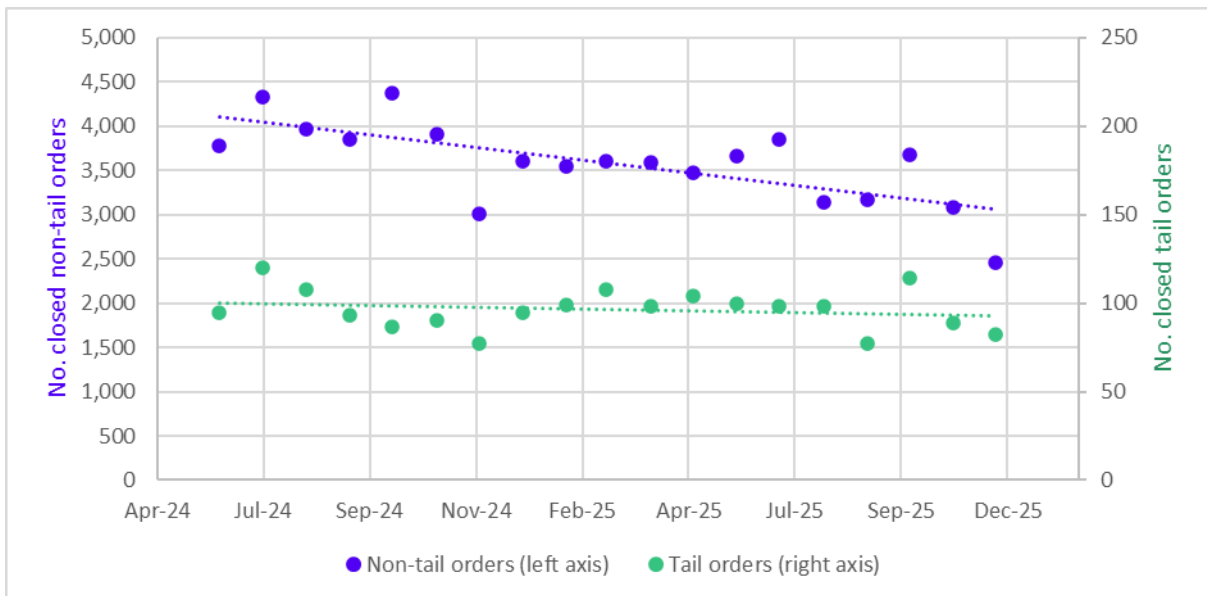
**Figure 4.2: The Mean Time To Provide of relevant Openreach ethernet provisions**



Source: Openreach reports to Ofcom. WFTMR Leased Line KPI Report – December 2025.

4.88 Figure 4.3 shows the number of LLA orders closed by Openreach each month, split by how many working days the order was open for. This shows that orders taking more than 133 working days to close has roughly stayed constant since June 2024, but the number of orders closed in 133 or less working days has decreased by around 25%.

**Figure 4.3: Number of closed ethernet orders by time taken to provide the order**



Source: Openreach reports to Ofcom. WFTMR Leased Line KPI Report – December 2025.

4.89 Our view is that the greater drop in less complex orders in Figure 4.3 means that improvements in the MTTP are likely to be due to improved Openreach performance in delivering provisions, rather than because orders on average are becoming less complex.

- 4.90 More explicitly, if orders were becoming less complex on average, then we would expect the number of completed tail orders to fall at a quicker rate than the number of completed non-tail orders. As we have observed the opposite of this, it seems unlikely that orders are becoming less complex.
- 4.91 However, it is unclear whether this increase in performance is due to changes to Openreach's processes or whether it is the result of more resources being available as a result of reduced demand, or a combination of these two factors.

#### Stability of tail orders

- 4.92 Openreach also said that there is limited scope for speeding up more complex tail orders due to the high propensity of those orders to be affected by delays that are subject to third party factors like wayleave applications or traffic management.<sup>188</sup>
- 4.93 We consider that being subject to these types of delay does not by itself mean there are no significant process improvements that Openreach could undertake to improve performance.<sup>189</sup> Openreach also recently provided us with information that several initiatives had helped reduce the absolute number of tails in October and November 2025.<sup>190</sup>
- 4.94 However, we recognise that the extent to which these types of delays may reduce further is uncertain, given there will be constraints on Openreach's ability to affect these orders. Specifically, we recognise that:
- a) some of the recent fall is likely to be from initiatives which have one off impacts;
  - b) it is not clear that a continued reduction in tails will be sustainable; and
  - c) the denominator (total open orders) may continue to fall, putting additional upwards pressure on the %.
- 4.95 Given this context, we think a sufficient improvement in tails performance in absolute terms that would be needed to meet the minimum QoS standard proposed in the March 2025 Consultation is likely to be very challenging for Openreach to achieve going forward.
- 4.96 We consider that for the proposed standard to be a reasonable target for Openreach it would require a reversing of the changes in the composition of orders. We think this is unlikely as it is likely to require a reversing of recent demand changes, which is uncertain, particularly in the short term, and also require a reversing of any recent changes to Openreach's processes, which both is unlikely and also undesirable if changes have led to performance improvements for some orders.
- 4.97 Given this, we consider that the minimum QoS standard for the UPL proposed in the consultation, i.e. unadjusted, would not be proportionate for the 2026-2031 review period. We have therefore decided to adjust the existing QoS standard to account for these changes that affected the overall workstack and number of open tails.

#### Adjusting the minimum QoS standard

- 4.98 We have decided to introduce an additional limit to the QoS standard covering the absolute number of tail orders in the workstack, when the volume of open orders is low.<sup>191</sup> We consider that this provides a more consistent incentive on Openreach to maintain

<sup>188</sup> [Openreach](#) further response to TAR26 March 2025 Consultation. Ethernet Tails QoS. Paragraph 4.3.

<sup>189</sup> For example, improve times in getting applications completed and sent to third parties.

<sup>190</sup> Openreach response dated 13 February 2025 to s135 notice dated 3 February 2026, question 1.

<sup>191</sup> This QoS minimum standard is described in Table 4.2 above.

performance and is reasonable and proportionate at lower order volume levels and less likely to lead to unintended consequences.<sup>192</sup>

- 4.99 However, we disagree that this additional element should be set at 600 as proposed by Openreach. This appears to be materially higher than the number of tail orders in the existing workstack.<sup>193</sup> We thus do not think this level is likely to provide an adequate incentive on Openreach over the 2026-31 review period.
- 4.100 We have set the level for the absolute numbers of tail orders at 550 because we consider that is a reasonable and proportionate performance level for setting minimum QoS standards for the 2026-31 review period. The average number of monthly open tail orders across 2025 was 550.<sup>194</sup>
- 4.101 We consider that setting this at 550 provides an appropriate backstop that ensures the absolute number of open orders is unable to increase significantly above its current level. This is consistent with our approach that minimum QoS standards should provide a backstop level of performance to limit any incentive on Openreach for performance to deteriorate.
- 4.102 The additional element is also only relevant when the volume of open orders is low. More specifically, when there are at least 12,222 open ethernet orders in Openreach's workstack, the QoS minimum standard is unchanged from its existing level under this approach. Therefore, if some of the recent demand changes are reversed, the standard would operate in the same way as it did in the 2021-2026 period.
- 4.103 For the purposes of assessing compliance with the UPL standard on an annual basis from 2026/27 onwards, we will take annual averages of the monthly figures for LLA KPI H1 (the percentage of open orders that are over 133 working days old) and of the numerator of the same KPI (the number of open orders older than 133 working days old). From these we will determine whether Openreach has met one or more of these two requirements and has therefore complied or not.
- 4.104 We consider that this combined approach is appropriate and means that consumers are still protected from there becoming an excessive amount of tails orders. We also consider that this approach is proportionate given the recent changes in demand and the provisioning mix described above.
- 4.105 We will also continue to monitor Openreach's provisioning performance, alongside market conditions, to ensure that the adjusted UPL continues to sufficiently protect customers from excessive tail orders, both in quantity and duration. We may consult on further adjustments to the standard within the TAR review period if we judge that this is necessary.

## Transparency obligations

- 4.106 We have an existing reporting framework which broadly covers:

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<sup>192</sup> For example, we would not want Openreach to slow down or reduce its focus on speeding up, 'easy to install' orders, in order to decrease the percentage of tails in the open workstack in order to meet the UPL.

<sup>193</sup> Across the second half of 2025 there were around 530 monthly tails on average. Ofcom analysis of Openreach reports to Ofcom. Openreach reports to Ofcom. WFTMR Leased Line KPI Report – December 2025. KPI (H1).

<sup>194</sup> Ofcom analysis of Openreach reports to Ofcom. Openreach reports to Ofcom. WFTMR Leased Line KPI Report – December 2025. KPI (H1).

- the time it takes Openreach to complete installation orders;
- fault repair performance,
- Openreach's ability to meet its committed delivery date (and the timing of this date); and
- monitoring of more complex and delayed orders (including specific in-depth reporting on a less frequent basis).

4.107 Openreach is required to provide this information to Ofcom on a regular basis and publish a subset of this data on its website.

4.108 We consider that this framework had been successful, providing information on key QoS metrics which informs our analysis and ongoing monitoring.

4.109 We had no specific response from stakeholders on this and have therefore decided to continue to require BT to provide the comprehensive set of QoS performance statistics in LLA and IEC markets in which we find BT to have SMP.

# 5. QoS regulation in the physical infrastructure market

## Our proposals

- 5.1 We proposed not to impose QoS standards in the physical infrastructure market. We also proposed not to impose transparency requirements on Openreach in relation to QoS in the physical infrastructure market. These proposals would maintain the current regulatory position from WFTMR 2021.

## Stakeholder responses

- 5.2 Openreach said it was supportive of our approach and reasoning.<sup>195</sup>
- 5.3 CityFibre said it was concerned that Openreach does not face regulatory obligations to provide PIA to an acceptable standard.<sup>196</sup> It argued that PIA is now sufficiently mature that QoS obligations should be imposed, and that a decision not to do so is not reasonable. CityFibre noted that Ofcom proposed to maintain QoS standards in WLA, LLA and IEC markets, and said that this ensures greater specificity to the obligations Openreach is under in those markets and provided confidence to users that Ofcom can monitor and enforce its requirements effectively.
- 5.4 CityFibre argued that QoS was particularly necessary for PIA, given our proposal not to impose an equivalence of inputs (EOI) obligation in the physical infrastructure market. It argued that we had imposed QoS in other markets that are delivered on an EOI basis, despite that higher non-discrimination standard. It also contended that Openreach did not face the same internal pressure to deliver QoS in PIA, as it does in other markets where downstream BT businesses are consuming the products.<sup>197</sup>
- 5.5 CityFibre also said it did not believe that the current voluntary KPIs were sufficient to monitor NUD compliance and enforce the PIA remedy. It said these only focussed on one aspect of PIA operational performance (NA delivery) and that the comparator data used was problematic as it relates to a different product (Ethernet).<sup>198</sup>
- 5.6 Fibrus argued that there was a strong case for Ofcom to introduce regulatory metrics for Openreach to work within for NAs.<sup>199</sup> It said this would benefit PIA users' ability to plan their network changes and customer communications effectively, particularly in storm recovery scenarios.
- 5.7 INCA said it was disappointed that QoS measures had not been introduced for PIA in the TAR.<sup>200</sup>

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<sup>195</sup> [Openreach](#) response to TAR26 March 2025 Consultation. Document 5. Page 42.

<sup>196</sup> [CityFibre](#) additional response to TAR26 March 2025 Consultation. PIA Implementation Issues. Page 7.

<sup>197</sup> [CityFibre](#) additional response to TAR26 March 2025 Consultation. PIA Implementation Issues. Page 7.

<sup>198</sup> [CityFibre](#) additional response to TAR26 March 2025 Consultation. PIA Implementation Issues. Page 7.

<sup>199</sup> [Fibrus](#) response to TAR26 March 2025 Consultation. Page 11.

<sup>200</sup> [INCA](#) response to TAR26 March 2025 Consultation. Page 22. Paragraph 75.

## Our reasoning and decisions

- 5.8 We have decided not to impose QoS standards or transparency requirements in the physical infrastructure market.
- 5.9 In Volume 3, Section 5, we set out our decision to maintain the requirement on Openreach to provide PIA. We recognise that Openreach performance and QoS when delivering PIA is critical to the effectiveness of the remedy.
- 5.10 There is a need for metrics that provide transparency of performance to PIA users, OTA2 and Ofcom. Such metrics allow all parties to identify any emerging performance issues, and potential discrimination issues can be identified with corresponding comparator metrics.
- 5.11 To date, Ofcom has pushed for these metrics to be agreed by industry. This is because continued development of the product – which in practice comprises a range of services, systems and processes – and changing take-up made it difficult to assess whether QoS standards or transparency requirements are necessary, or what the appropriate metrics or standards should be.<sup>201</sup> We considered that industry was best placed to identify and agree the most important metrics for PIA.
- 5.12 Industry has defined and implemented a set of KPIs to provide transparency to PIA users, the OTA2 and Ofcom. Openreach publishes these KPIs on a quarterly basis. These KPIs continue to be discussed at an industry level, and we expect there to be some ongoing development as to the exact KPIs/metrics reported. Over the last review period, Ofcom has both monitored and assisted in the development of these metrics and closely tracked Openreach’s performance against them.
- 5.13 Currently, we do not consider that it is necessary to reflect existing KPIs in regulation. This is because there is not strong evidence of a performance related issue in relation to these metrics. If a performance issue were to develop during the review period, Ofcom can consider whether to use the QoS SMP condition to intervene.
- 5.14 Moreover, while we recognise that PIA has developed significantly in recent years, it continues to evolve and adapt to the needs of users.<sup>202</sup> The existing voluntary metrics may need to evolve with a changing product and new metrics might be required to monitor performance and non-discrimination during the next review period. The ongoing development of PIA makes it difficult for us to assess what QoS standards or transparency requirements would be necessary (should we consider it appropriate and necessary to make such interventions) and what the appropriate levels for QoS standards should be, increasing the risk of regulatory failure and unintended consequences.
- 5.15 Given the above, we remain of the view that, currently, industry is best placed to identify and agree performance metrics for PIA. We consider that this approach allows industry to

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<sup>201</sup> For example, the PIA product includes giving PIA users access to a specific mapping tool and requires PIA users to go through a process whenever network adjustments are required. Openreach and PIA users work together to continually improve and develop the PIA product including through trials like the recent underground proof of concept that aims to enable faster network adjustments for PIA users.

<sup>202</sup> We discuss product developments, including the OTA2’s ‘Beyond the Build’ programme of work, in Volume 3, Section 5.

define the issues it considers critical and provides flexibility for measures to be refined and developed as necessary over time.<sup>203</sup>

- 5.16 We encourage industry to consider where new or refined metrics are warranted, including taking into account changing use of or priorities for the product. Industry should work with the OTA2 to identify where these may be necessary and engage with Ofcom and Openreach where there is agreement, so they can be assessed appropriately. Openreach must act on reasonable requests for transparency data, and we will monitor the handling of requests to ensure that this is the case. We would consider making use of our direction making powers, should reasonable requests, on which there was consensus amongst PIA users, be frustrated.
- 5.17 Regarding the comparisons drawn by CityFibre to other markets in which we have previously imposed QoS alongside EOI requirements, we note that in every case, a decision to impose QoS standards results from evidence of a QoS issue in the relevant market. Overall, there is no strong evidence that there is a QoS issue in the physical infrastructure market at present.
- 5.18 A lack of evidence for a QoS issue is also relevant when considering Fibrus' proposal for Ofcom to introduce NA focussed regulatory targets for Openreach. We do not consider this necessary at the current time, as industry already receives a range of metrics from Openreach regarding NAs. These include time-based metrics like 'Mean Time to Provide' which can be scrutinised against comparable internal Openreach activities to assess for potential undue discrimination. Over the lifetime of the product, these metrics have not raised concerns about NA performance.<sup>204</sup>
- 5.19 We note that part of Fibrus' concern appears to be that Openreach is not sufficiently incentivised to prioritise PIA customer recovery in the aftermath of incidents like extreme weather. We note that Openreach is subject to NUD obligations and these will continue to apply when making decisions that affect the level playing field, including in recovery from extreme weather events. We encourage PIA users to pursue new NUD KPIs where there is a desire for more specificity, and we expect Openreach to engage constructively with any requests. We also note work led by the OTA2 that is ongoing related to recovery of assets in such circumstances.
- 5.20 In response to CityFibre's comments that the current voluntary KPIs are an insufficient means to monitor NUD compliance, we first note that these KPIs form part of a wider set of tools that Ofcom employs to monitor compliance. We set out our broader approach to PIA implementation and compliance in Volume 3, Section 5. We do not consider that the lack of QoS requirements hinders our ability to monitor and take enforcement action should we receive evidence of a breach of Openreach's obligations in the physical infrastructure market. We also note, in response to concerns about comparisons to ethernet, that whilst ethernet products are relied upon for a small number of verification-based NUD KPI comparators, the majority of NUD KPI comparators are based on equivalent measures from Openreach fibre build activities.
- 5.21 We will continue to monitor Openreach's performance as part of our PIA Supervision work, which we discuss in Volume 3, Section 5. If we were to encounter concerns during the

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<sup>203</sup> We note that putting the existing metrics in regulation when there is no strong case to do so could make it harder for these existing metrics to be developed further.

<sup>204</sup> Ofcom. September 2025. [Openreach Monitoring Report 2025](#). Page 12.

review period which led us to consider that imposing interventions pursuant to the QoS SMP condition was proportionate and necessary, then we could at that point exercise our direction making powers.

## 6. Legal tests

- 6.1 Our regulatory framework for undertaking market reviews and setting SMP conditions is set out in Annex 1.
- 6.2 In this volume we set out our decision to require BT to comply with any QoS standard and reporting requirement we may direct in relation to network access it provides in each of the following product markets – physical infrastructure, WLA (Area 2 and 3), LL Access (HNR, Area 2 and 3) and IEC (BT Only exchanges, BT+1 exchanges, and for a transitional period newly reclassified BT+2 exchanges).
- 6.3 In order to give regulatory effect to our decision we have decided to set SMP Condition 10 set out in Volume 7. Section 87(3) of the Act authorises the setting of SMP services conditions in relation to the provision of network access. Section 87(5) of the Act provides that such conditions may include provision for securing fairness and reasonableness in the way in which requests for network access are made and responded to and for securing that the obligations contained in the conditions are complied with within the periods and at the times required by or under the conditions. Section 87(6)(b) of the Act also specifically authorises the setting of SMP services conditions which require a dominant provider to publish, in such a manner as Ofcom may direct, all such information for the purposes of securing transparency.
- 6.4 We also set out in this volume our decision to set QoS Directions pursuant to SMP Condition 10 in the markets for WLA (Areas 2 and 3), LLA (Areas 2 and 3) and IEC (BT Only and BT+1 exchanges, and for a transitional period newly reclassified BT+2 exchanges).

### Section 47 tests

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- 6.5 We consider that SMP Condition 10 satisfies the tests set out in section 47 of the Act, namely that the obligation is:
- objectively justifiable in relation to the networks, services or facilities to which it relates;
  - not such as to discriminate unduly against particular persons or against a particular description of persons;
  - proportionate to what the condition or modification is intended to achieve; and
  - transparent in relation to what it is intended to achieve.

### Objectively justified

- 6.6 We consider that SMP Condition 10 is objectively justifiable. It is designed to address the competition concerns that we have identified in our market analysis (see Volume 2). As explained in Section 2 above, our market analysis has found, among other things, that BT has the ability and incentive to not maintain an adequate level of service quality in the installation and repair of wholesale services or to discriminate in the quality of provision.
- 6.7 Therefore, in the absence of a requirement to comply with any QoS standards and transparency requirements directed, BT could degrade its QoS below an adequate level, or it could provide access seekers a worse QoS compared to that obtained by its own downstream businesses.

- 6.8 We explain above why we consider that obligation is objectively justified in the context of the markets we have reviewed.

## Not such as to discriminate unduly

- 6.9 We consider that SMP Condition 10 does not discriminate unduly against BT. We have decided that it is the only telecoms provider to hold SMP in the markets that we have identified (or can be treated as such under section 46(8A) of the Act regarding the IEC BT+2 markets) and the SMP condition seeks to address that market position.

## Proportionate

- 6.10 We consider that SMP Condition 10 is proportionate to what it is intended to achieve. We have decided to impose an obligation on BT that: is effective to achieve our aim; is no more onerous than is required to achieve that aim; and does not produce adverse effects which are disproportionate to our aim. We explain above why we consider it is proportionate in the context of the markets we are reviewing.

## Transparent

- 6.11 We consider that SMP Condition 10 is transparent in relation to what is intended to be achieved. The text of the SMP condition is published in Volume 7 and the operation of the SMP condition is aided by our explanations in this statement, which sets out our analysis of responses to the consultation and the basis for the final decision.

## Section 46 tests

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- 6.12 In Sections 2 and 4, we are imposing SMP Condition 10, and QoS Directions pursuant to that Condition, to apply to deregulated BT exchanges for a transitional period of 12 months in relation to active leased lines and a transitional period of three years in relation to DFX (we are also imposing transparency requirements which will apply for a further 30 working days after each transitional period).
- 6.13 Section 46(8A) of the Act provides that we can continue to treat a person (here BT) previously determined as having SMP in a given market, who we determine no longer has SMP in that market, as continuing to have SMP in that market for so long as we consider necessary to ensure a sustainable transition for those benefitting from the obligations imposed as a result of the previous SMP determination.
- 6.14 For the reasons set out in Section 2 and 4, we consider that the 12 month period for active IEC services and the three year period for DFX (and further 30 working days for the transparency requirements in respect of each) is necessary for a sustainable transition for telecoms providers from Openreach's active leased lines and DFX to alternative services. We consider that each transitional period is no longer than necessary to achieve this aim. We therefore consider our decision to be consistent with section 46(8A) of the Act.

## Section 49 tests

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- 6.15 We consider that the QoS Directions satisfy the tests set out in section 49(2) of the Act, namely that in each case the Direction is:
- objectively justifiable in relation to the networks, services or facilities to which it relates;

- not such as to discriminate unduly against particular persons or against a particular description of persons;
- proportionate to what it is intended to achieve; and
- transparent in relation to what it is intended to achieve.

6.16 In particular, the QoS Directions are:

- a) Objectively justifiable, in that they aim to ensure that BT provides adequate levels of QoS in relation to the installation and maintenance of the network access on which telecoms providers and their customers rely. For the reasons set out above, we consider that, to achieve this level of QoS, it is appropriate to continue imposing quality standards at the levels we have decided to set and to impose new QoS standards for FTTP in WLA Area 3 at the levels we have decided to set. We are imposing transparency KPIs on the delivery of specified services to provide transparency around QoS.
- b) Not unduly discriminatory, in that the Directions would apply only to BT, which is the only operator we have found to have SMP in the markets (or can be treated as such under section 46(8A) of the Act regarding the IEC BT+2 markets in which the Directions would apply).
- c) Proportionate, in that the Directions are targeted specifically to those areas and services for which regulation is required. We consider that the Directions are a proportionate means of achieving our objective of protecting consumers by ensuring an appropriate level of service in the delivery of key aspects of network access, taking into account our assessment of BT's operational capabilities and potential costs to customers and telecoms providers. Further, the requirements are structured to take into account the impact of events outside BT's control on its ability to meet the standards. The transparency Directions are targeted at only those services where we consider that transparency is necessary. We also consider that the Directions are no more onerous than is required to achieve our aim; and do not produce adverse effects which are disproportionate to our aim.
- d) Transparent, in that it is clear in its requirements and intention, as explained above. The text of the Directions is set out at Volume 7.

## Ofcom's duties

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6.17 As set out in Volume 1, we consider the package of SMP conditions and related Directions both individually and together meet our duties in sections 3 and 4 of the Act.