

Reference: 02094846

Information Requests
information.requests@ofcom.org.uk

12 December 2025

Dear,

Freedom of Information request: Right to know request

Thank you for your request for information concerning PSA and Virtual Network Operators.

We received this request on 21 October 2025 and we have considered your request under the Freedom of Information Act 2000 (“the FOI Act”). On 11 November 2025 we asked you to clarify the scope of your request. On 14 November 2025 we received your response.

Your request

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Therefore, the specific information I am requesting is: Any correspondence, internal notes, emails, briefings, or advice held by PSA/Ofcom regarding:

- *The definition or interpretation of “Virtual Carrier” or “Virtual Network Operator” in the context of levy allocation;*
- *PSA/Ofcom’s view or consideration of levy responsibility where VCs/VNOs hosted number ranges Telecom2;*
- *Any advice or guidance provided to, from, or involving on this topic.*
- *Any information, analysis, or communications relating to PSA/Ofcom’s handling of the above dispute or enquiries from Telecom2.*

To assist with any search strategy, suggested keywords include:

Virtual Network Operator

Virtual Carrier

Levy

Telecom2

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Our response

It would take us a substantial amount of time to read through the records that may contain the information to determine if, and what, we hold relating to the specific information you have requested.

We therefore consider that Section 12 of the FOI Act applies to your request as a considerable amount of time would be needed to locate, retrieve, identify and extract any relevant information. Section 12 of the FOI Act provides that a public authority is not obliged to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the

“appropriate limit”. The appropriate limit is set out in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004, and is, for Ofcom, £450. That sum is intended to cover the estimated costs involved in determining whether Ofcom holds the information requested, identifying, locating, retrieving and extracting the information from any document containing it. The Regulations provide that costs are to be estimated at a rate of £25 per person per hour.

There are at least 93 documents we shall need to read through, and we estimate that it would take at least 18 hours to identify, locate and extract the information you require and as such the cost of complying with your request will exceed the appropriate limit. We will therefore not be able to provide any information in connection to your request however you are welcome to submit a narrower request.

Please note that other exemptions under the FOI Act may still apply to the information above if held. For example, as we are prohibited from disclosing information related to a business under section 393 of the Communications Act 2003, [section 44 of the FOI Act](#) may apply to a request about information we hold about a business. Additionally, the FOI Act contains disclosure exemptions such as [Legal professional privilege information \(section 42\)](#) and [Prejudice to the effective conduct of public affairs \(section 36\)](#) that might also be relevant.

Yours sincerely,

Information Requests

Request an internal review

If you are unhappy with the response you have received to your request for information, or think that your request was refused without a reason valid under the law, you may ask for an internal review. If you do, it will be subject to an independent review within Ofcom. We will either uphold the original decision, or reverse or modify it.

If you would like to ask us to carry out an internal review, you should get in touch within two months of the date of this letter. There is no statutory deadline for us to complete our internal review, and the time it takes will depend on the complexity of the request. But we will try to complete the review within 20 working days (or no more than 40 working days in exceptional cases) and keep you informed of our progress.

Please email the Information Requests team (information.requests@ofcom.org.uk) to request an internal review.

Taking it further

If you are unhappy with the outcome of our internal review, then you have the right to [complain to the Information Commissioner's Office](#).