

Consultation response form

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

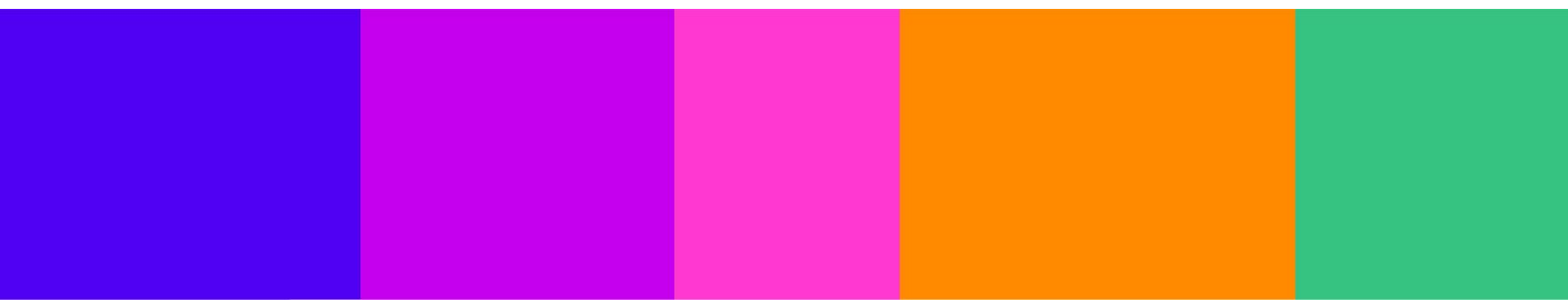
Consultation title	Consultation: Promoting competition and investment in fibre networks: Telecoms Access Review 2026-31
Full name	
Contact phone number	
Representing (delete as appropriate)	Organisation
Organisation name	BBC
Email address	

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Your name / Whole response
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	Whole response
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes

Your response



The BBC will provide a short narrative response rather than answering the detailed questions in the response form. We are not a direct stakeholder in the UK telecoms market. However, the BBC's position at the UK's leading media organisation means we have an indirect but growing stake in the success of the UK telecoms sector to serve UK citizens, as our audiences increasingly shift their engagement with BBC output to IP distribution methods for video and audio, from legacy distribution methods of broadcast digital terrestrial television (DTT) and satellite.

Ofcom's own 2024 [Future of TV Distribution](#) report set out the drivers clearly, and Ofcom will be aware that DCMS is midway through their [Future of TV Distribution Stakeholder Forum](#) process to assess the three approaches to the future of TV distribution that Ofcom laid out last year. In that Forum, and our other engagements, we are encouraging policy makers to consider the positive spillover effects of carefully coordinating and sequencing between the DCMS future of TV distribution process, the DSIT [Digital Inclusion Action Plan](#) process around digital inclusion, DWP's [Get Britain Working](#) plans and ambitions around Government to increase the penetration and use of digital routes to delivering public services, for example [Patients to receive reminders and test results via the NHS App](#).

Therefore, this is a short response to highlight the potential inter-dependencies with this Telecoms Access Review (TAR) process and positive spillover opportunities to generate inclusive economic growth that are available if policy making is carefully sequenced and coordinated across a number of agendas. We encourage Ofcom to consider and discuss this potential with Government as appropriate.

We are supportive of Ofcom's view that *'gigabit-capable networks are beneficial to consumers of communications services (including both consumers and businesses) and citizens in general'*, for the reasons set out in Volume 1 of Ofcom's publications, that compared to copper, gigabit-capable networks:

- offer higher speed and capacity,
- do not suffer deterioration over distance,
- have lower fault rates as they are not susceptible to water ingress or corrosion,
- offer a better viewing experience for video and
- can be more easily upgraded to higher speed services as needed.

It is now essential for UK households to have good quality, reliable and affordable IP connectivity, as it increasingly underpins getting and finding paid work, managing finances through online banking, accessing the NHS and ongoing health and or social care support, as well as watching TV or listening to audio services from the BBC and other audio-visual providers.

Therefore, we are generally supportive of the direction of travel Ofcom proposes in this TAR consultation to continue to *'promote competition and investment in gigabit capable networks – bringing faster, better broadband to people across the UK'*.

Our views are concentrated in two areas:

First, the opportunity to coordinate efforts on retiring legacy services and offering suitable support to households that need it to transition, driving better cumulative outcomes (question 3.1). In telecoms this would be PSTN switch off and copper networks retirement, in TV's case switch over from DTT and, perhaps, satellite distribution.

And second in quality-of-service requirements (QoS, question 5) into the future and the need to have minimum common standards for reliability and repair for all IP connectivity providers as it becomes an ever more essential service to households.

Q3.1 Do you agree with our proposed approach to supporting copper retirement? Please set out your reasons and supporting evidence for your response.

Broadly speaking, yes we do.

We encourage Ofcom to consider how via the TAR process, or in parallel or subsequent to it, regulatory and policy approaches can be coordinated to not just encourage but, when appropriate, support full migration away from copper and to gigabit capable services.

We believe this should be coordinated with DSIT's ambitions stated in their February 2025 Digital Inclusion Action Plan First Steps to ensure: *'everyone has the access, skills, support and confidence to engage in our modern digital society and economy, whatever their circumstances'*.

And we encourage Ofcom to explore with DSIT how copper retirement could be coordinated with potential updates to the telecoms universal service obligation (USO) following its forthcoming review by Government.

In both processes we encourage policy makers to assess what minimum standards for last mile connectivity should be required to support video viewing over IP eventually replacing legacy digital terrestrial transmission (DTT) or satellite distribution for TV. We suggest that policy makers should consider how many concurrent video streams at what quality definition should be a minimum comparable to the standard use case 'normal' service delivered via DTT today.

Coordinating copper retirement with suitable support on devices, skills and confidence for reluctant households and with moving to an updated USO in due course, are obvious ways to make progress on both retirement of legacy infrastructure and digital inclusion.

If DCMS decides to pursue 'Approach 3' for TV distribution – a planned switchover from legacy distribution to IP distribution for TV, there could be additional benefits in carefully sequencing both the infrastructure transitions in telecoms and TV distribution and support programmes offered to households in need, to make them both more cost and more outcomes effective.

The BBC recently commissioned a socioeconomic study from PWC to size the opportunities here using pink book methods. The key findings here are:

- £4.9 – 9.4bn net gains to the Exchequer
- £21.2 – 30.8bn potential increase in GVA
- £26.6 – 31.4bn non-market impact

Questions 5 (grouped answer) do you agree with our proposals for QoS?

Generally, we are supportive of Ofcom's view that competition between networks is the best means of delivering appropriate levels of Quality of Service (QoS).

However, we encourage Ofcom to consider going further in two aspects:

First, to consider and start a process to establish what future minimum level of QoS and service level agreements (SLA) may be required and by when, for all UK internet providers to drive baseline improvements in reliability and resilience, while also encouraging competition above this minimum threshold.

Given a reliable internet connection is increasingly an essential requirement for:

- healthcare access and delivery, as with digital wards;
- getting and doing paid work, as more and more work opportunities are only advertised online and as more and more roles can be partially or wholly done from home;
- banking, as local bank branches close,
- TV viewing where an end to broadcast DTT in the 2030s is under consideration by the Government, and DCMS's own research forecasts that in the 2030s 95% of households will be viewing TV over IP at least some of the time, whatever path forward the Government pursues on TV distribution¹.

The BBC believes that UK households are likely to need, and expect, reliability of their IP service, and repairs and restoration of service to clearly defined expectations whichever provider or type of IP service they are with, in the 2030s, if not before that.

Second, to compare how broadband reliability and reach compares to DTT reliability and reach today, and into the future.

While very different services, there are permanent not spot issues with DTT coverage, for example for some coastal and rural areas. And there are also seasonal issues with reliable reception caused by high pressure or storm damage in some areas. And lastly occasional catastrophic events like the Bilsdale transmitter fire².

Ofcom coordination on these issues would be a valuable contribution to the Government's current deliberations on the way forward for TV distribution.

Lastly, the BBC believes that greater consideration needs to be given to the interconnected questions of resilience of IP networks with power network resilience. Both now and into the future given the ever-increasing reliance of UK households on IP connectivity to meet multiple needs making this not just a useful, but essential, service underpinning UK economic activity.

Question	Your response
Question 2.1: Do you agree with our provisional conclusion on physical infrastructure product market definition? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N

¹ [FUTURE OF TV DISTRIBUTION](#)

² [Bilsdale Transmitter Fire: Incident Review](#)

Question	Your response
Question 2.2: Do you agree with our provisional conclusion on physical infrastructure geographic market definition? Please set out your reasons and supporting evidence.	Confidential? – Y / N
Question 2.3: Do you agree with our provisional conclusion on the application of the three criteria test to the physical infrastructure market? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 2.4: Do you agree with our provisional finding on SMP in the physical infrastructure market? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 2.5: Do you agree with our provisional conclusions on geographic market definition for the wholesale local access market? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 2.6: Do you agree with our provisional conclusions on geographic market definition for the wholesale local access market? Please set out your reasons and supporting evidence.	Confidential? – Y / N
Question 2.7: Do you agree with our provisional conclusion on the application of the three criteria test to the wholesale local access market? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 2.8: Do you agree with our provisional findings on SMP in the wholesale local access market? Please	Confidential? – Y / N

Question	Your response
set out your reasons and supporting evidence for your response.	
Question 2.9: Do you agree with our provisional conclusions on product market definition for leased lines? Please set out your reasons and supporting evidence.	Confidential? – Y / N
Question 2.10: Do you agree with our provisional conclusions on geographic market definition for the leased line access market? Please set out your reasons and supporting evidence.	Confidential? – Y / N
Question 2.11: Do you agree with our provisional conclusion on the application of the three criteria test to the leased line access market? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 2.12: Do you agree with our provisional findings on SMP in the leased line access market? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 2.13: Do you agree with our provisional conclusions on product market definition for the inter-exchange connectivity market? Please set out your reasons and supporting evidence.	Confidential? – Y / N
Question 2.14: Do you agree with our provisional conclusions on geographic market definition for the inter-exchange connectivity market? Please set out your reasons and supporting evidence.	Confidential? – Y / N

Question	Your response
Question 2.15: Do you agree with our provisional conclusion on the application of the three criteria test to the wholesale inter-exchange connectivity market? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 2.16: Do you agree with our provisional conclusions that BT has SMP at BT Only exchanges and BT+1 exchanges, but not at BT+2 exchanges for the wholesale IEC market? Please set out your reasons and supporting evidence.	Confidential? – Y / N
Question 3.1: Do you agree with our proposed approach to supporting copper retirement? Please set out your reasons and supporting evidence for your response.	Confidential? – Y Please see our narrative answer above
Question 3.2: What are your views in relation to our initial thinking on how we might identify excluded premises? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 3.3: Do you agree with our proposed approach to exchange exit? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 3.4: Do you agree with our proposed general remedies? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 3.5: Do you agree with our proposed specific remedies in the PIA market? Please set out your	Confidential? – Y / N

Question	Your response
reasons and supporting evidence for your response.	
Question 3.6: Do you agree with our proposed specific remedies in the WLA markets? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 3.7: Do you agree with our proposed specific remedies in the LLA markets? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 3.8: Do you agree with our proposed specific remedies in the IEC markets? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 3.9: Do you agree with our proposed approach to geographic discounts and other commercial terms? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 4.1: Do you agree with our proposed approach in WLA Area 2? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 4.2: Do you agree with our proposed approach in WLA Area 3? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 4.3: Do you agree with our proposals for charge controlling LLA services in LLA Area 2 and LLA Area 3 and not introducing a charge control on LLA services in the HNR Area?	Confidential? – Y / N

Question	Your response
Please set out your reasons and supporting evidence for your response.	
Question 4.4: Do you agree with our proposals for charge controlling in the IEC markets? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 4.5: Do you agree with our proposals for charge controlling in the PIA market? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 4.6: Do you agree with our proposed approach for ancillaries? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 4.7: Do you agree with our proposals on charge control design? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 4.8: Do you have any comments on the drafting (non substantive) amendments to the charge control conditions described above and set out in Volume 7?	Confidential? – Y / N
Question 5.1: Do you agree with our proposal to retain a QoS SMP condition in all wholesale fixed telecoms markets in which we provisionally determine that BT has SMP and where we propose to apply transitional arrangements? Please set out your reasons and supporting evidence for your response.	Confidential? – Y Please see our narrative response above

Question	Your response
Question 5.2: Do you agree with our proposals for QoS regulation in WLA markets for this review period? Please set out your reasons and supporting evidence for your response.	Confidential? – Y Please see our narrative response above
Question 5.3: Do you agree with our proposal to keep the same QoS regulations in place for LLA and IEC markets for this review period? Please set out your reasons and supporting evidence for your response.	Confidential? – Y Please see our narrative response above
Question 5.4: Do you agree with our proposal not to impose specific QoS standards or transparency requirements in the physical infrastructure market? Please set out your reasons and supporting evidence for your response.	Confidential? – Y Please see our narrative response above
Question 6.1: Do you agree with our proposal to retain the accounting separation and cost accounting remedies on each of the proposed SMP markets? Please set your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 6.2: Do you agree with our proposals in relation to the published performance schedules set out in Section 4? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question 6.3: Do you agree with our proposals in relation to the preparation and assurance of the RFS set out	Confidential? – Y / N

Question	Your response
in Section 5? Please set out your reasons and supporting evidence for your response.	
Question 6.4: To what extent do you think it is necessary to require BT to publish in the reconciliation report the impact on current year figures of each methodology change reported in the CCN (which includes the impact of each change on prior year figures)?	Confidential? – Y / N
Question 6.5: Do you agree with our proposals in relation to information provided to Ofcom set out in Section 6? Please set out your reasons and supporting evidence for your response.	Confidential? – Y / N
Question A21.1: Do you agree with our assessment of the potential impacts on specific groups of persons? Please provide reasons for your response, with any supporting evidence.	Confidential? – Y / N
Question A21.2: Do you agree with our assessment of the potential impacts on Welsh language? Please provide reasons for your response, with any supporting evidence.	Confidential? – Y / N

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