



UKCTA's Response to Ofcom's Consultation:

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

June 2025

Executive Summary

- UKCTA broadly welcomes the regulatory continuity proposed by Ofcom, believing it is essential for market investors as we progress towards a full fibre future.
- Business connectivity differs from broadband in several respects and therefore requires a targeted business connectivity approach.
- Quality of service is critical, and FTTP is now mature enough to necessitate basic QoS safeguards for all geographic areas served by Openreach. Openreach should not seek to avoid minimum safeguards and should always aim to exceed them.
- PIA users require long-term certainty, and five-year rolling cycles of market reviews do not provide this. UKCTA members are eager to obtain PIA commercial certainty over an extended time horizon.
- Action is needed to address Openreach shrinkflation. The scope of regulated services must be specified in greater detail to prevent service degradation and cost transfer to retailers.
- Remedies need to be meaningful and impactful, and existing commercial or contractual barriers should not hinder communication providers from taking advantage of any new remedies proposed by Ofcom.
- Openreach Exchange Exit should ensure that other communication providers are not financially disadvantaged. Openreach must cover all fair costs arising from the programme, regardless of whether these costs are within BT or an external CP.
- The withdrawal of the copper network is a crucial issue, and its accompanying regulatory framework cannot be delayed until after 2031. A targeted consultation is needed in 2026 to provide clear guidance to the industry and consumers.



Introduction

1. This submission is made by the UK Competitive Telecommunications Association (UKCTA). UKCTA is a trade association promoting the interests of fixed line telecommunications and broadband companies competing against BT as well as each other, in the residential and business markets. Its role is to develop and promote the interest of its members to Ofcom and the Government. Details of membership can be found at www.ukcta.org.uk. Its members serve millions of UK consumers and businesses.

UKCTA broadly welcomes the regulated continuity that Ofcom are proposing

1. Ofcom's 10-year plan from 2021 aims for fibre infrastructure competition. As we near the halfway mark, maintaining continuity is essential for investors, market players, and consumers. While the overall direction remains, tweaks are needed when initial assumptions fail. This submission addresses necessary adjustments and key issues like exchange exit and copper withdrawal omitted in full or in part from the 2021 plan.

Distinguishing Business Connectivity from Consumer Broadband

2. UKCTA welcomes Ofcom's decision in the Telecoms Access Review 2026-31 to maintain separate market definitions for Wholesale Local Access (WLA) and Leased Line Access (LLA). This reflects the distinct nature of business connectivity and is vital to ensuring proportionate, evidence-based regulation.
3. While combining the review of residential and business services into one process may offer administrative efficiency, the material differences between these markets must be fully accounted for in both evidence gathering and the design of remedies.
4. Business connectivity includes enterprise-grade services such as leased lines, dark fibre, and Ethernet, typically used by public bodies, data centres, MNOs, and large enterprises. These services are uncontended, symmetrical, contractually bespoke, and come with stringent SLAs and SLGs, including repair times measured in hours. Their pricing, provisioning, and resilience requirements, often underpinned by legal obligations like the NIS Regulations, differ significantly from consumer broadband. In contrast, broadband services are



standardised, best-effort, and increasingly delivered at scale through FTTP networks focused on residential and SME markets. Competition is broader and price-driven, supported in part by government subsidies in harder-to-reach areas.

5. Importantly, Ofcom's 2021 expectation that altnets would evolve into "multi-service networks" with enterprise-grade wholesale capability has not materialised. UKCTA members observe that altnets remain largely focused on the residential market¹, and have not yet connected large business premises or begun wholesaling at scale. Business connectivity remains structurally distinct and less competitive, particularly outside CLA and HNR areas.
6. The "basket control" mechanism for lease line pricing provides flexibility for Openreach to offset price changes across multiple services. This has a disproportionate negative impact on alternative CPs that do not purchase the full suite of services. We believe stricter controls are necessary to ensure fair and proportionate pricing.
7. The continuation of annual CPI-based increases requires careful reassessment, particularly in light of recent network developments (e.g. exchange closures, availability of new real estate, and other cost-saving measures for Openreach).
8. We support Ofcom's targeted remedies for business services, such as continued dark fibre obligations and price controls in Area 3. However, the regulatory framework must continue to reflect the increased complexity, and criticality nature of business connectivity in the form of targeted remedies and obligations that support UK business. Failing to do so risks distorting competition, deterring investment, and undermining services that support the UK's digital infrastructure.

Quality of Service

¹ UKCTA member Vorboss is a dedicated business provider in London



9. Ofcom accepts that Openreach will retain significant market power (SMP) in Area 2 through the next market review period. UKCTA considers that, in the absence of appropriate regulatory protections, there is a material risk that Openreach will exercise that SMP to continue to deliver substandard quality of service (QoS). Although Ofcom expects that growing network competition in Area 2 will drive improvements in Openreach's QoS, this competitive constraint will remain uneven and uncertain across much of the area. Openreach is still the only gigabit-capable provider in a large share of its FTTP footprint and, even where altnets are present, many lack the scale or commercial maturity to exert real pressure.
10. Quality of service concerns are not limited to FTTP in Area 2; it equally applies to leased lines in these areas. In the absence of adequate QoS protections, many CPs will inevitably need to pass additional costs and service risks onto their customers. It is therefore important to maintain sufficient QoS safeguards in the leased lines market.
11. Ofcom's decision to impose minimum QoS standards in Area 3, while declining to do so in Area 2, risks creating unintended distortions. By only introducing QoS standards in Area 3, Openreach may be incentivised to reallocate resources away from Area 2 to comply with obligations where they exist, further degrading service quality in unregulated areas. This is particularly concerning in parts of Area 2 where Openreach faces minimal, clustered competition, and in the context of a broader trend of cost-saving from Openreach which has resulted in 'shrinkflation' in other areas (see below).
12. Reliance on performance reporting and existing SLA/SLG frameworks in Area 2 is also insufficient. These obligations have been in place throughout the last market review period, and yet Openreach's quality of service has remained well below competitive benchmarks. Recent industry efforts to negotiate binding FTTP service levels have made little progress, with Openreach declining to agree to minimum performance thresholds and continuing to withhold service-level guarantees in key areas such as delayed provisioning. This further demonstrates that, even in Area 2, the market has not reached the level of competition that will drive commercial outcomes on quality of service.
13. To mitigate these risks and ensure a level playing field, Ofcom should introduce minimum QoS standards in Area 2, [set at Openreach's current performance levels or at least in line



with those proposed for Area 3]. Introducing new MSLs would better balance Ofcom's objectives to protect consumers and retail competition while promoting investment and network competition; it would protect consumers from poor quality while having little or no impact on Openreach's incentives to invest further in FTTP.

14. These standards would act as a regulatory backstop – not a ceiling – to prevent service deterioration, and help industry negotiate higher-quality commitments. Minimum standards are, by definition, the lowest acceptable threshold of performance; contractual commitments between Openreach and its customers should be set meaningfully above this baseline to ensure adequate service levels and consumer protection. Introducing such a regime would protect consumers and retail competition, while having a negligible impact on investment incentives given that both Openreach and its rivals already exceed these thresholds in many areas.
15. Openreach's wholesale inputs do not just impact the business model of the retail ISPs – they have a clear link to the end customer's experience. A perfect example is automatic compensation, where Openreach's decision to stop increasing the wholesale payment to ISPs at the same time as the payment to customers has been increasing with CPI. Retailers are now funding 31% of the payment for Openreach-caused delayed repair and provision – up from 15% in 2019 when the initiative was introduced. This is unsustainable. We recognise that this is beyond the scope of the TAR, but we recommend that Ofcom considers this asymmetry in a consultation next year.

Promoting greater long-term certainty - PIA five-year cycle

16. UKCTA welcomes Ofcom's draft finding that BT continues to hold national SMP (exc. Hull) in the Physical Infrastructure market. BT's dominant position in the Physical Infrastructure market has clearly strengthened during the WFTMR review period and appears likely to strengthen still further during the upcoming TAR review period, as PIA plays a vital role in many rival networks.
17. As a result, we welcome Ofcom's proposal to continue to require Openreach to provide PIA for unrestricted use, nationwide, and charged controlled at cost. This form of remedy has been critical for attracting significant network investment to date and has the potential to



provide substantial benefits to end users in the long-term, addressing BT's unique role in the UK telcoms market.

18. We welcome Ofcom's observation² that Openreach is considering the introduction of contract lengths longer than five years. While we were not aware that this was under active consideration by Openreach, it is a positive development. However, this does serve to highlight an inherent limitation of the five-year market review cycle, and the impact this limited time horizon could have on investor and customer longer-term certainty.
19. In its launch documentation and in the consultation itself, Ofcom has recognised the considerable challenges new entrants face in overcoming Openreach's incumbency advantage.³
20. In the case of the PIA product, it is clear that Openreach has asymmetric certainty about its de facto perpetual access to own physical infrastructure in a way that PIA access seekers do not. This is especially problematic given the specific nature of the PIA remedy.
21. Openreach's own investment decision can be made in full confidence that its infrastructure will be available to it indefinitely. Even in the event of some, as yet unforeseen, future regulatory change, this might only amount to an adjustment to internal transfer payments recognised in the RFS, within BT Group.
22. In contrast, PIA access seekers do not have this same assurance. Current or potential investors in PIA access seekers only have five years of clarity that access conditions, charge controlled costs, unrestricted use, geographic availability, and national uniformity of terms, will remain unchanged.
23. Likewise, current or potential wholesale customers of PIA access seekers will face similar uncertainty when considering striking long-term strategic partnership. Ofcom recognises that *"New networks need to build customer bases and achieve scale in order to become*

² Vol.3, 5.59

³ E.g. [Launch Doc](#), 3.6, TAR, Vol.1, 1.7



*sustainable competitors over the longer term.”*⁴ Long-term certainty about PIA access conditions and pricing will likely be key to enabling long-term strategic planning, which will be necessarily for material and sustainable network competition to take hold.

24. We recognise that Ofcom cannot unduly fetter its discretion in future market reviews, and decisions or statements made during TAR cannot bind reviews conducted across, say, future decades that are relevant for investment decision made in today. Nevertheless, Ofcom has sought to articulate its intended approach to regulation beyond 2031 in various aspects of TAR.⁵

25. We encourage Ofcom to provide similar clear guidance about its view on its future approach to PIA and the role it plays in its wider framework for regulating the Physical Infrastructure, as well as downstream markets. This could include:

- how its approach to date has been intended to foster longer-term certainty, to encourage investment in long-lived network assets, including those dependent on PIA;
- that PIA has been, and likely will continue to be, the cornerstone of Ofcom’s ex ante strategy for these relevant markets;
- that Ofcom recognises use of PIA entails investment decisions in long-term assets with useful lives that span decades, and that Ofcom is cognisant of this in how it will approach future regulatory decisions;
- that Ofcom’s intended trajectory, “[...] *a path to even greater deregulation in the future, allowing competition to replace regulation permanently*”⁶, is predicated on material and sustainable competition emerging and sustaining, and that PIA plays an essential role in that intended transition; and
- that Ofcom recognises changes to the availability of PIA, or the form of remedy, (e.g. unrestricted use, nationwide and uniform terms, and charge controlled at cost, inter

⁴ Vol.1, 1.7

⁵ Examples such as Vol.1, page 7-8, Vol.1, 2.58-2.62, Vol.4, 1.95-1.104

⁶ Vol.1, 2.59



alia), could be disruptive to long-term strategic planning for investors, access seekers, and wholesale customers alike.

Combatting Shrinkflation

26. UKCTA urges Ofcom to address the persistent issue of shrinkflation in regulated services, where the scope and quality of service delivery are reduced over time while charges remain unchanged or increase. This trend has led to communications providers (CPs) absorbing more operational burden and cost, without any corresponding reduction in wholesale prices or improvement in service outcomes.
27. To ensure the effectiveness of the regulatory framework and maintain competitive neutrality, Ofcom must incorporate specific anti-shrinkflation safeguards into the final Telecoms Access Review (TAR) remedies. In particular:
- **Enhance the legal instrument with greater product specificity:** The legal text underpinning Ofcom's remedies should include a more detailed definition of regulated services. This should clarify that the product is expected to be delivered as a fully managed service, with defined provisioning support, service wrap, and performance standards. Such clarity would reduce ambiguity, limit the scope for unilateral service erosion, and ensure that the intended benefits of regulation are preserved throughout the review period.
 - **Define a minimum service wrap** that must accompany regulated services, including provisioning support, equipment interfaces, and fault management.
 - **Require formal consultation and review** for any changes to service scope or delivery models.
 - **Mandate cost pass-through obligations**, ensuring that operational savings are reflected in lower prices or improved service levels for CPs.
 - **Introduce transparency and monitoring mechanisms** to allow CPs and Ofcom to track service changes and challenge shrinkflationary trends.



28. By embedding these protections into both the remedies and the legal framework, Ofcom can provide greater certainty to the market, protect CPs from incremental service degradation, and uphold the principles of fair competition and consumer benefit.

Remedies need to be meaningful and impactful

29. We are concerned about the effectiveness of Ofcom's proposed new remedies in the LLA market. OSA/10G EAD current purchases need a regulatory approach if CPs are trapped in long term contracts taken out before DFA/X regulated options are enabled and where Early Termination Charges are a barrier to change.
30. These legacy contracts, often entered into at a time when passive remedies were unavailable or unregulated, continue to constrain CPs' ability to migrate to more efficient and cost-effective solutions. In practice, this means that even where DFA or DFX become available, CPs may be unable to take advantage of these remedies due to the financial penalties associated with early termination. This undermines the effectiveness of Ofcom's regulatory strategy and risks entrenching BT/Openreach's market power by locking CPs into outdated commercial arrangements.
31. Ofcom must therefore consider not only the availability of new remedies but also the commercial and contractual environment in which they are to be adopted. Remedies that exist only in theory but are inaccessible in practice due to legacy contract structures, cannot deliver the intended pro-competitive outcomes. In-situ OSA and 10G EAD services have been procured under long-term agreements prior to the introduction of dark fibre remedies, and the associated ETCs will act as a deterrent to switching, even where a regulated alternative is available.
32. To address this, Ofcom should consider introducing transitional protections or targeted charge controls for in-situ active services where switching is constrained. This would ensure that CPs are not penalised for historical infrastructure constraints and that the benefits of new remedies are realised in full. Alternatively, Ofcom should require BT/Openreach to waive ETCs for CPs migrating to DFA or DFX within newly regulated areas. This would



remove a key barrier to switching and ensure that the remedy is not only available in theory but also accessible in practice.

33. With respect to remedies that are being continued from the Wholesale Fixed Telecoms Market Review (WFTMR), we consider that work is required to ensure that the efficacy of remedies is not constrained by contractual terms between Openreach and CPs or other commercial practices. Ofcom should consider Openreach's current and past contracting approaches and their often-negative impact on competition.
34. In its 2021 WFTMR, Ofcom describes Physical Infrastructure Access ("PIA") PIA remedy as a significant part of its strategy "as it secures the access to Openreach's physical infrastructure that will help support other telecoms providers in deploying competing fibre networks at scale."⁷ In the TAR, Ofcom goes further to highlight that PIA remains its "primary remedy for promoting network competition and investment in WLA and LLA networks."⁸
35. Given that this is not a new remedy, Ofcom should satisfy itself that the remedy will have genuine market impact. The success of the PIA remedy must be underpinned through well-thought out long-term implementation strategies which are sufficiently specific, stretching and timely to have the desired impact on competition.
36. In addition, Ofcom must ensure that the product is being developed by Openreach as proactively as possible. With the awareness of their SMP, it can be said that Openreach has not sufficiently progressed the PIA product in a way which truly encourages competition. By way of example some concerns with Openreach's current contracting approach are:
- a) Limited contract terms – Openreach offers a very limited range of contract durations (a single option of 5 years currently exists for PIA spine build) which has an adverse impact on the CPs when seeking investment and/or bidding for projects, as greater wholesale security of supply is often demanded. While Ofcom notes in the TAR that Openreach is

⁷ WFTMR final statement, 18 March 2021, Volume 3, Para 4.2.

⁸ TAR Volume 3 para 5.2



‘considering’ whether to offer a greater range of contract duration options, there is uncertainty about whether this will actually come to pass or when.

- b) Lack of Information – Openreach does not currently provide sufficient information about its wayleave data in a manner that is efficient for CPs to consume, such as a look-up database, that would enable the full benefits of the greater sharing rights under the Electronic Communications Code introduced in 2024 to be realised. We consider that Openreach should be required to offer such a look-up feature – particularly as this could be viewed as an ancillary service as proposed by Ofcom in the TAR (in particular, an element of the already-required PIA Database Access).
- c) Reference Offer Breaches – Prior to 2024, the only remedies for breaches of the Reference Offer (no matter how minor) were termination or suspension. After being requested by industry, Openreach eventually introduced a “graduated response process”, offering a more flexible, diverse and appropriate range of response options to different kinds of CP breach. Although this is a welcome development, there would be benefit in requiring its application to be extended further to cover an even broader range of breach types.

37. In addition, there are other improvements that we believe could be made to PIA, including:

- a. Improvements to the PIA Internal Reference Offer (IRO): Requiring Openreach to include more detail in the IRO about the differences that exist in how Openreach uses its network and how PIA CPs are permitted to do so, would be helpful. Extra detail and clarity are required because it is currently difficult for a reader to ascertain whether the differences are compatible with Openreach’s No Undue Discrimination (NUD) obligations. Expanding the text to help a reader better understand why the Openreach-CP changes exist would make the IRO a more useful tool.
- b. Recognising the limitations of the IRO and designing broader solutions in response: While improvements to the IRO would be beneficial and welcome, the nature of an



IRO document itself has fundamental limitations in helping to gauge Openreach's compliance with its NUD obligations. Ofcom should recognise this and consider what additional steps should be taken in response. Chief among these in our view would be greater and more proactive monitoring of Openreach's infrastructure use and requiring Openreach to justify why Openreach-CP differences exist.

- c. Equivalence of Inputs (EOI) for new systems and processes is welcome but must be actively and effectively enforced: While Ofcom's proposal to require EOI for new PIA services and systems is welcome, current practice often falls far short of this aspiration. Openreach often fails to treat PIA customer needs as a priority when developing new systems and apps and doesn't consult industry early in the design process — as seen with the Tungsten finance system and safety monitoring apps. To fix this, we would encourage Ofcom to actively monitor compliance and establish formal requirements for Openreach to engage with industry from the outset.
- d. Require Openreach to improve the PIA billing system: To address a range of current issues faced by PIA CPs, Ofcom should consider taking steps to require Openreach to improve the labelling of charges on invoices and ensure that correct reference numbers are always included. It should also be an explicit requirement for Openreach to stop billing for PIA usage in pence and instead move to the much more appropriate unit of pounds. Measures should also be aimed at ensuring any billing errors that do occur are fixed by Openreach promptly and effectively.
- e. Require Openreach to get on top of problems with 'missing inventory': Openreach imposes strict rules requiring PIA customers to fix their own record-keeping errors at their own expense but faces no equivalent accountability for its own poor records — particularly in relation to 'missing inventory' infrastructure records. This creates an unfair burden where CPs are often held up in their build activity when they discovered Openreach data errors that must be reported to Openreach and corrected, while Openreach faces no adverse consequence for the poor state of their network records. A good solution we have heard suggested would be for Ofcom to impose an arrangement, like the existing Network Adjustment regime for



physical problems, requiring Openreach to either fix its data errors promptly or compensate CPs for doing the work by submitting corrected records to Openreach.

Exchange Exit

38. BT Openreach's exchange exit strategy is a vital step towards shifting the UK's communications infrastructure. While it will provide significant benefits in terms of efficiency and service quality, its success will be contingent on effective collaboration among Openreach, telecom providers, and Ofcom.
39. From a strategic and technological standpoint, we broadly support Ofcom's proposal to reflect BT's exchange exit policy in the Telecoms Market Review 2026-31. However, due to the lack of transparency in terms of the precise scope and timescales involved, we see a need for a flexible and dynamic set of regulatory remedies during the control period to mitigate the adverse implications of the numerous risks, which include:
- **Market Disruption Risk:** While larger telcos may be able to respond to exchange exit effectively, smaller or regional operators may face financial or logistical issues. Moving equipment and rethinking access strategies are neither cheap nor straightforward.
 - **Service Continuity:** Even with extensive notice periods, transferring old services (such as some PSTN or business-critical connections) may cause disruption, especially if customers are not properly notified or parallel infrastructure is not available in time.
 - **Regulatory Ambiguity:** Ofcom is now depending on a light touch approach and hoping for collaboration. If Openreach tightens access to remaining exchanges—Ofcom may need to intervene more forcefully, and it isn't yet clear how agile it will be in doing so.
40. The financial burden of the exchange exit programme should rest primarily with Openreach. As the owner of the physical infrastructure being decommissioned—including copper cabling, exchange buildings, and legacy equipment—BT/Openreach must absorb the capital expenditure required to dismantle outdated systems and reinvest in modern alternatives. To mitigate this cost, BT/Openreach will be able to resell the useable elements such as copper



cabling. While this process will result in long-term operational savings, such as lower maintenance and energy expenses, the initial cost of decommissioning and asset write-downs is uncertain. Given its age, removal of legacy equipment, which is likely to be fully depreciated in accounting terms, will be unlikely to materially affect BT's balance sheet and we propose that Ofcom should confirm this in advance so as to prevent a repetition of the impact on interconnection pricing that we saw some years ago when BT decided to revalue its infrastructure estate.

41. In addition to physical decommissioning, Openreach must be responsible for the relocation of services that now use these exchanges. Wholesale products such as LLU and backhaul will need to be modified or relocated to permanent exchanges. While downstream providers are responsible for their own adaptation expenses, Openreach is expected to assist with the technical and logistical shift by offering tools, portals, and planning resources to minimise interruption.
42. Another important aspect of financial responsibility is overseeing the overall programme. Coordinating the exit is a significant undertaking that necessitates dedicated programme management teams, stakeholder involvement, and regulatory compliance measures. Openreach must maintain communication with Ofcom, ISPs, and other stakeholders throughout the process to ensure clarity, transparency, and consistency.
43. Moreover, during the transition phase, Openreach must bear the cost of operating duplicative infrastructure. Legacy copper-based systems must remain operational until the full migration of services is completed, even if the new fibre-based infrastructure is already in place. This includes costs related to site power, security, and system monitoring, all of which create a temporary financial overlap that Openreach must self-fund. We understand that Openreach currently operates a 90-day parallel running period to enable CPs a satisfactory window in which to effect the transfer of their own infrastructure and it would assist us if Ofcom would determine that this minimum period be mandated for the duration of the control period (2026-31).



44. Openreach's ability to pass on migration-related expenses to the market is further restricted by regulations. According to Ofcom's Equivalence of Inputs (EOI) guidelines, Openreach cannot unjustly pass financial responsibilities to wholesale customers. This means that pricing for long-term exchange access must remain cost-based and non-discriminatory, and in some situations, Openreach may need to waive or cut costs to minimise market distortion—particularly for smaller providers who may be disproportionately affected by the changeover.
45. It is essential that the exchange exit programme is designed and delivered in an end-customer-centric manner. Openreach's obligations extend beyond internal group interests and must reflect the needs of the entire UK communications market, particularly those of downstream providers and their end users.
46. Moreover, true customer-centricity involves consideration of the downstream impact on end users. This means Openreach must ensure that no consumer or business loses connectivity or suffers degraded service quality due to poor coordination or lack of foresight in the programme. Any mass migration of infrastructure carries a risk of service gaps, particularly where fibre coverage is not yet fully available. Openreach must therefore work proactively with both CPs and infrastructure partners to ensure that viable alternatives are in place. By ensuring that all stakeholders are treated fairly and that no provider is left behind during the transition, Openreach can help enable a smooth, inclusive transition to a fibre-based future that benefits the broader digital economy rather than favouring internal group performance targets.
47. While the financial burden for Openreach may be significant, it is consistent with their strategic goal of shifting to a contemporary, fibre-first network. This investment helps to ensure long-term competitiveness, operational efficiency, and regulatory compliance. Given the extent and magnitude of the exchange exit project, Openreach's financial responsibility is both rational and necessary.

Copper Withdrawal



48. UKCTA urges Ofcom to define the third threshold for copper withdrawal well before 2031. Deciding on the terms for the threshold requires a dedicated and focused consultation process—distinct from the broader Telecoms Access Review. Given the complexity and breadth of that review, there is a real risk that this issue could be overlooked. A separate process would allow for input from across Ofcom’s economic, policy, and consumer teams, ensuring a well-rounded and robust approach.
49. The goal must be to establish a clear and practical pathway for withdrawing copper services at premises, but only once a series of safeguarding conditions have been met. It would not be in the interests of UK consumers for the regulator to remain silent on this issue until after 2031. This cannot be addressed in isolation. Ofcom must bring together its cross-functional expertise to define a disconnection threshold that provides clear guidance to both retailers and wholesalers—particularly on how to manage disengaged or vulnerable customers. The industry needs a consistent and transparent rulebook to ensure no consumer is left behind.
50. While both Ofcom and Government may be well-intentioned, continued deferral of this issue due to its complexity is harmful. Policy inaction risks undermining consumer outcomes. A full, exchange-by-exchange copper switch-off is inevitable, and valuable lessons will emerge from each phase of implementation.
51. Ultimately, we need a transparent, step-by-step framework that supports consumers in transitioning to fibre services that meet their future connectivity needs—culminating in the safe and fair withdrawal of copper.
52. UKCTA would ask Ofcom to initiate a focused consultation in late 2026 to define the parameters of the third threshold and provide clear, actionable guidance to communication providers on safeguarding and engaging with non-responsive customers and clearing the way for the network to be turned off. Leaving a minority of customers on a legacy platform longer than necessary will trigger economic consequences for all consumers and puts those customers at risk of service interruptions in a network that is harder and harder to maintain with each passing year.



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