



**Openreach's response to Ofcom's**  
"Ofcom's proposed plan of work  
2024/25 Making communications work  
for everyone"

8 February 2024

## Introduction

On 15 December 2023, Ofcom published its consultation document entitled "*Ofcom's Proposed Plan of Work 2024/25*" ("the Consultation").

This response is provided by Openreach Limited - a wholly owned subsidiary of BT Group plc.

We are the UK's largest wholesale broadband network provider. We build and maintain an open network that is used by more than 680 Communications Providers (CPs), so they can offer broadband, phone, and TV packages to homes and businesses all over the UK.

Our network is made up of more than 254 million kilometres of fibre optic cables and copper wires. To maintain and grow a network of this scale requires an exceptional team, and our 29,000 field engineers work around the clock, in all kinds of weather and in every community. Last year they completed 10.4 million engineering jobs, installing and maintaining the equipment that provides fast, reliable broadband to millions of people. Our work often involves liaising closely with local councils, highways agencies, energy suppliers and landowners, to solve complex engineering and logistical problems.

## Openreach's comments on Ofcom's proposals

1. Openreach welcomes the opportunity to comment on Ofcom's proposed Plan of Work for 2024/25. It is helpful that Ofcom publishes its goals and priorities for the year ahead together with the key projects so that stakeholders are able to comment and influence the Plan of Work.
2. Openreach similarly is transparent about its strategic priorities and goals, which broadly align to Ofcom's expectations as per its plan. This document highlights those areas of synergy and the role that Openreach plays in supporting Ofcom's aims.
3. Our plans support the Government's ambition of making Gigabit capable broadband available to consumers and businesses and, in doing so, we are determined to be as open and transparent about our build programme as we can be. By the end of 2026, we will have built past 25 million premises with fibre including 3.2 million homes and businesses in harder to reach areas.
4. At Openreach, we are investing £15 billion into building full fibre. A full fibre network that stretches throughout the UK can give rural communities the chance to attract investment, which in turn provides job opportunities, and supports the provision of essential services like education and healthcare.
5. Openreach will be retiring the PSTN network by the end of 2025 and we have been working to withdraw any Openreach products that work over it. We have already made lots of progress in getting CPs to encourage their customers to 'go digital' in this way, and more than 500 of our exchange areas – covering some 4.6m premises – are now in this 'stop sell' phase.
6. As Ofcom begins work to re-assess the fixed telecoms markets, the current WFTMR21 framework remains instrumental in promoting competition between networks and driving full fibre rollout. The framework, which ends in March 2026, gave the industry stability to make decisions and invest in full fibre.
7. The wholesale fixed telecoms sector in the UK is a success story. Millions of households and businesses are getting access to ultrafast and ultra-reliable full fibre broadband services as industry rolls out new optical fibre networks at a world-leading pace, largely on the back of massive private sector investment.

8. This investment has only happened because of the stable public policy and regulatory framework that has given long-term certainty and set a level-playing field on which Openreach and its competitors can compete fairly.
9. But the investment needed to upgrade the UK's telecoms infrastructure is not yet complete and it is important that the public and regulatory policy framework is maintained to ensure incentives to invest are protected and that the good outcomes for the UK's consumers, businesses, economy, public services and society can continue to be delivered.

Ofcom is right to recognise the importance of access to a high-quality network. Ensuring continued investment in these networks and services will remain a priority, as will ensuring they are safer, more secure and resilient.

10. Openreach has a highly important role to play in the roll out of fibre. Our aim is to connect 25 million homes and businesses to full fibre broadband by 2026, and more than six million of those are in the hardest-to-reach and most remote communities in the UK. We have built out to over 12.5 million premises whilst also ensuring we are balancing build in the hardest to reach rural communities. The new network will provide a future proof, more reliable and dependable broadband service that will support the UK for decades to come.
11. Once we have rolled out full fibre into an area, it does not make sense for us to keep lots of different old technologies running – it will be very expensive, replacement parts are no longer being made, and it will not allow us to push forward with our plans to give the UK world class connectivity as quickly as we would like. We stopped selling Wholesale Line Rental (WLR) to new customers across the UK on 5 September 2023. And as we continue our full fibre roll out, we are also winding down the range of copper-based services we supply.

Openreach is committed to providing a secure and resilient telecoms infrastructure

12. Openreach appreciates Ofcom's and the DSIT's collaborative approach of enabling compliance with the Telecommunications (Security) Act 2021. Openreach is keen to play its part and is contributing to the reporting and monitoring requirements to ensure compliance with the new security framework.

## Information gathering – managing the impact on stakeholders

13. Openreach provides a wealth of information to Ofcom as part of its required monitoring and analysis of the telecommunications industry – for example in relation to Connected Nations report, investigations and market reviews. Openreach works closely with Ofcom’s Information Registry Team and very much values its role in coordinating formal and informal information requests and working with stakeholders on the timing of requests and feedback on information gathering. Given the breadth of Openreach activities such planning is key to ensure the business provides accurate, complete and timely responses. Openreach would be interested in participating in any review of Ofcom’s information gathering approach.

## Strengthening our technology capability: Openreach supports Ofcom’s understanding of how technology is changing networks, services and a range of technologies.

14. Bringing full fibre broadband to 25 million homes and businesses is an enormous and complex infrastructure project, one of the biggest in the UK. We need to balance it with delivering great service across all of our existing networks. We are always looking for ways to evolve and innovate, so we can be faster, more efficient and more effective for our customers.

## Openreach supports Ofcom’s emphasis on sustainability and climate change

15. Building and maintaining our network sustainably is one of our driving principles. It shapes our operations and demands that we constantly challenge ourselves and others to develop new and better ways of working so that we look after the environment.
16. Our mission – to build full fibre – will create a more sustainable communications network: more energy efficient, more reliable, an integral part of a greener economy that is fit for the future.
17. We know that the work of transforming our network will have an impact on the environment. So we have set ourselves three specific objectives: reduce our carbon footprint; use fewer materials and reducing our waste; and protect the natural habitats we encounter. Taken together, they represent the holistic approach we need to fulfil our ambition to build sustainably.

18. We are very conscious of our carbon emissions and we are determined to limit them. We will be a Net Zero business by 2031. The electricity that powers our network and operations is already 100% renewable. We use innovative route and task planning to reduce the miles our engineers' vans must cover. And those vans are changing too: we have over 4000 electric vehicles and our fleet will be fully converted to zero emissions by 2031.
19. As we build, we are using less, wasting less, and keeping tools and materials in use for longer. We are recycling materials which previously went to landfill. We are continually exploring new ways of re-using or re-purposing materials that cannot simply be recycled. And we are demanding change from our partners, too, requiring our suppliers to minimise packaging and convert all that remains to recycled, recyclable, or reusable materials wherever possible. That said, we cannot avoid all waste, so, where materials cannot be reused or repurposed, we are ISO14001 certified on environmental management.
20. Few businesses range as far and as wide as we do, and everywhere we work we engage with nature. From creating special build plans for protected areas, to training our engineers to check sites for wildlife, to installing birdboxes, we aim to protect and enhance the natural habitats we encounter.
21. Our mission is to build the best possible full fibre network. Building it sustainably is the right thing to do for our business, the communities we serve, and the environment we all share.

Openreach supports the ambitions to strengthen Ofcom for the future with a focus on diversity and inclusion

22. We are part of the fabric of the UK with over 37,000 colleagues and we believe it is important and right for us to fairly represent the diverse and inclusive communities that we serve.
23. We have created a strong community of allies, with over 2,300+ of our colleagues on board, across every part of the business. They are committed to acting as inclusion allies in everything they do.
24. We have 6 core People Networks in Openreach; Ethnic Diversity, Pride, Gender Equality, Neurodiversity, Allies and Able2. They advocate on behalf of the people they represent and champion their voices.

Improving safety is a big priority at Openreach, we want to help make sure that our future – both online and offline – is a secure and sustainable one.

25. Openreach is enhancing our safety culture. We have invested in a multi-year programme called “everyone home safe and well”, which is helping us embed 12 lifesaving rules and four ‘everyday safety’ behaviours right across our business. Almost all employees have now taken part in our dedicated safety culture training, called ‘Hearts & Minds’.
26. We are really proud to have won three awards from the Royal Society for the Prevention of Accidents: The Information and Communication Industry Sector award, a Fleet Safety Gold award and the ‘Best New Entry’ award.
27. We also continue to work with the Institute of Customer Service and share our work across the industry to promote better support for public servants. The ‘Service with Respect’ campaign has been calling for a change in the law to protect customer-facing workers from abuse – including tougher sentencing for people who commit assaults against people providing a public service.
28. We also launched an internal campaign called ‘Your Right to Feel Safe’, which focused on supporting our people in a better way when they experience harassment or abuse while they are doing their jobs.

## Project Work for 2024/25

The following focuses on some of the key areas in Ofcom’s work plan for 2024/25 as set out in Annex 2 of the Consultation document. Openreach provides its comments in these areas and would be happy to follow up with Ofcom or other interested parties as required.

<p><b>Telecoms Access Review 2026-2031.</b> We will start our review of wholesale fixed telecoms markets which will set regulation from April 2026 to March 2031 and will publish our consultation in Q4 2024/25. This will cover the markets for physical infrastructure access, wholesale local access, leased line access and other relevant markets</p>	<p>Consultation Q4 2024/25</p>
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- Ofcom has stated that it expects its WFTMR framework to endure for at least ten years, reflecting that the decision to invest in full fibre is a long-term one with a payback of more than a decade. It respects the ‘fair bet’ principle, which allows investors to earn a fair return on their whole investment over that investment cycle. It has also allowed wholesale prices to grow modestly in line with inflation to support the investment required.
- Ofcom has also facilitated alternative network builders to invest by mandating regulated access to Openreach’s physical infrastructure (telegraph poles and underground ducts). This has allowed them to deploy their own fibre, where otherwise it would not have been economically viable.
- But the investment needed to upgrade the UK’s telecoms infrastructure is not yet complete and it is important that the public and regulatory policy framework is maintained to ensure incentives to invest are protected and that the good outcomes for the UK’s consumers, businesses, economy, public services and society can continue to be delivered.
- The one area in which the 2021 WFTMR framework was not fully developed was in relation to the withdrawal of Openreach’s copper services, where Ofcom did not reach firm conclusions. We think there is a need to provide further clarity here since, in some regions, we are already at very high levels of coverage, take-up is rising quickly, and decommissioning is rapidly moving up the agenda. Switching off legacy platforms will enable the industry to save cost and achieve its environmental commitments. We expect that Ofcom will want to consider this as part of its review of the regulatory framework in 2026.

<p><b>Network security and resilience.</b></p> <p><b>Security:</b> Using our powers introduced by the Telecoms Security Act, we will monitor compliance with the new security framework and submit our first report to the Secretary of State on telecoms security in Q3 2024/25. We will continue to engage with industry to carry out our threat intelligence-led penetration testing scheme (TBEST) and engage with security standardisation bodies to ensure the requisite visibility.</p>	<p>Report Q3 2024/25</p>
<p><b>Resilience:</b> We are consulting on revised guidance for communications providers on the resilience of their networks and services and will publish a statement on this next year. We continue to support the UK Government’s thinking on the future requirements for resilience of digital infrastructure.</p>	<p>Statement Q2 2024/25</p>
<p><b>Telecoms vendor diversification.</b> We will continue to enable newer vendors’ ability to test technology in a commercially neutral environment through the SONIC (SmartRAN Open Network Interoperability Centre) Labs open radio access network testbed. We will also continue to share our insight and expertise with the UK Government across diversification issues.</p>	<p>Ongoing</p>

- Openreach is committed to driving network security, resilience and vendor diversification in the UK and we understand the requirements of the Telecommunications Security Act, Code of Practice and Designated Vendor Direction. We also understand that security standards will evolve and that Openreach plays a pivotal role in ensuring the continued resilience of the UK’s telecom networks.
- Openreach has met our obligation to reduce the current FTTP footprint of Huawei to below 35%. We are continuing to build our FTTP network at significant pace with other vendors such as Nokia and Adtran and this along with interworking of ONTs, which will further reduce the percentage of Huawei footprint.
- Openreach engages with Ofcom on TBEST compliance and improvement processes whilst our products and services undergo independent IT health checking in lieu of CAS-T testing.
- We share the goal of network diversification and are committed to meeting all our legal obligations. We look forward to working with Ofcom to implement the security framework requirements over the coming year and beyond.

<p><b>PSTN Switch Off.</b> We will continue to work with communication providers to ensure issues raised by their migration to voice-over-IP services, including the potential future switch-off of the public switched telephone network (PSTN), are identified and addressed with the aim of protecting consumers from harm and minimising disruption.</p>	<p><b>Ongoing</b></p>
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- We are pleased that Ofcom has recognised the importance of migration to voice-over IP services and has therefore included this in its Plan of Work. We would encourage Ofcom to recognise the wide range of important issues that these subject raises, including:
  - Working with CPs on how we tackle edge use cases as we get closer to the 2025 closure date, for example, taking learning from our trials around non- responding customers
  - Working with CPs to deliver a new vulnerable customer migration process, supporting the OTA and industry work to have a consistent on the day migration experience for telecare users
  - Raising awareness of the 2025 closure date and Openreach facilitating dialogue across industry through engagement with government, telecare industry, trade bodies, charities and local authorities
- Openreach will continue to lead industry fora alongside the support of the OTA2 and Ofcom to share progress and work on migration best practice. This includes regular working groups with CPs and wider industry stakeholders that regularly attract over 200 attendees and a more focused steering group with key CPs. We would urge Ofcom to consider the future regulation required to enable exchange exit and copper withdrawal.

<p><b>Implementation of One Touch Switch.</b> We will continue to work with industry after its planned launch of One Touch Switch in March 2024 to ensure the new switching process is working well for broadband and landline customers</p>	<p>Ongoing</p>
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- We note that it is anticipated that OTS will not launch on 14 March 2024. However, Openreach continues to support industry in implementing the new OTS processes; this will allow CPs to develop their solutions in confidence of compatibility with Openreach. The Openreach systems changes comprise the removal of Cancel Other from migrations and changes to Minimum Lead

Times. To find out more please visit our dedicated portal [page One Touch Switch \(openreach.co.uk\)](https://openreach.co.uk).

- We continue to deploy our required functionality, as per the roadmap shared with industry, in a 'switched off' state until such time as industry confirms that it is ready to go live with One Touch Switch processes including having the Hub up and running to ensure consumer authentication and other measures are in place.

<p><b>Affordability of communication services.</b> Our quarterly Affordability Tracker will monitor and report on the extent to which households have difficulty paying for communications services, accompanied by our Pricing Trends publication in Q1 2024/25. We monitor the awareness and take-up of social tariffs as well as promotion of these services by providers.</p>	<p>Publication Q1 2024/25</p>
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- Openreach has an important role to play in the rollout of full fibre including making commitments to speeding up adoption and educating people about the benefits of full fibre. Openreach works closely with CPs to raise awareness, stimulate demand and make sure upgrades are smooth and affordable. Openreach will continue to work with government, Ofcom and industry on this important topic. Meanwhile we have introduced significant discounts on full fibre to encourage people onto our fastest, most reliable services.

<p><b>Supporting vulnerable customers.</b> We will continue to monitor whether providers are treating customers in vulnerable circumstances fairly and giving them the support, and services they need. This will include working with the UK Regulators Network to improve outcomes for vulnerable consumers</p>	<p>Ongoing</p>
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- Openreach strives to deliver decent, reliable and affordable broadband to all communities. In doing so, we provide our services to CPs, who are best placed to identify and support vulnerable customers.

<p><b>Connected Nations.</b> We will continue to report on the availability and use of broadband and mobile networks in this annual update, which also features a version for each of the nations of the UK.</p>	<p>Updates Q1 &amp; Q2 2024/25 Publication Q3 2024/25</p>
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- The large detailed Openreach data sets used for the Connected Nations report remain challenging to produce. This is because the core base data for UK properties and postcodes continually changes, and as we build new network and reconfigure our existing network then our connectivity, coverage and performance data also changes. We strongly support the positive and proactive way in which the Ofcom Connected Nations team engages with us to investigate and understand our data should any queries arise, and look forward to continuing to work with the Ofcom team to produce timely and accurate statistics for the UK.