

Ofcom's proposed Plan of Work 2025/26 *CCUK response – January 2025*

About CCUK

1. Comms Council UK is a membership-led organisation that both represents and supports telecommunications companies that provide services to business and residential customers in the UK. We keep Britain talking in its various guises by providing or reselling voice services over data networks (VoIP) as well as other “over the top” applications including instant messaging and video.
2. The membership is a mixture of network operators, service providers, resellers, suppliers and consultants involved in a sector that is diversifying rapidly. CCUK represents its members at a policy level, builds coalitions to collaborate on industry initiatives and provides a platform to help members prepare for change, learn about new trends and develop new business relationships.
3. We welcome the opportunity to respond to Ofcom's Plan of Work 2024/25 (the “Consultation”) published in December 2023. Our response, below, begins with general points, and then continues on an issue-by-issue basis. We trust our response will be of assistance, and we welcome any comments or questions that Ofcom has.

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General points

4. As was the case last year, Ofcom appears to place focus on the internet connectivity and spectrum aspects of the UK's telecommunications industry. While these are two essential elements of the industry, CCUK's members are concerned that this pays too little attention to voice services – an essential part of our critical national infrastructure – in favour of more publicly-visible outcomes, such as gigabit connectivity.
5. For several years, CCUK and some of its members directly have asked Ofcom to appoint a 'business champion'. This would be an individual or working panel of experts that would spend time speaking to business networks and service providers, to understand the structure of the industry, and then attend Ofcom meetings to provide that insight during policy formation. We firmly believe that such a role would significantly improve the decision making, and by extension the policy outcomes, from the regulator. We would like to see this concept return for consideration.

Gaining Provider Led Switching and Number Portability

6. CCUK is concerned that there is no mention in the draft plan for the ongoing project that began with the introduction of One Touch Switch. There continues to be reluctance across the sector and an initiative by some parts of industry to adopt OTS for business customers is likely to generate unforeseen challenges in the near future. CCUK is actively engaged in the Gaining Provider Led Business Steering Group (GPLB-SC) and we would welcome increased Ofcom support and engagement whilst the industry groups develop solutions in this space.
7. The current number portability process is not fit for purpose in the context of OTS and despite our call for an overhaul for at least a decade, there remains no driver for change. CCUK members believe that, to reach the desired outcomes for OTS, Ofcom need to initiate a review of the current porting process and the relationship with switching activities.

Fraud, nuisance calls, and scams

8. CCUK supports Ofcom's commitment to work with industry to make scams harder to perpetrate, and also to help consumers avoid scams by raising awareness and improving information. As a membership-led industry association for telecommunications companies, tackling fraud is one of our key priorities.
9. CCUK would like to see Ofcom commit to forming an industry engagement group which would acknowledge the multi-faceted nature of this complex problem and demonstrate a commitment to working with industry in a proactive and positive way to combat fraud and scams.
10. Our members dedicate a great deal of resource to tackling these challenges and CCUK are hosting a Fraud Summit in March 2025 in an effort to kick-start a more joined-up approach between the industry, the Home Office, Ofcom, national security and law enforcement agencies, as well as international organisations and regulators. We have invited Ofcom to engage at this event.
11. It is our view that review of technical advancements that may further assist in the prevention, detection and reporting of fraud should also form part of Ofcom's plan of work.

PSTN switch-off

12. CCUK welcomes Ofcom's commitment to work with communication providers to ensure that the switch-off of the PSTN will be addressed with the aim of protecting consumers from harm and minimising disruption. We are, however, still concerned that the project is not progressing with sufficient public awareness being made by independent and authoritative sources.
13. CCUK remains of the opinion that there needs to be an independent campaign – in the same vein as the terrestrial television switch-off – to inform society. It is unclear why a change to the delivery of television programmes merited a major public awareness campaign, but a change that could render telecare and lift alarms inoperable does not. In saying this, we remain conscious that Ofcom is constrained by its statutory remit, and that this is almost certainly a matter for the Government to address, but equally, Government should place significant weight on the recommendation of the specialist regulator.

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