

As Ofcom noted, the application of the current EU framework relevant to termination rates will end with the transition period on 31 December 2020.

The effect of the Eurorates proposal appears to be confined to how it will apply to EU countries when dealing with the termination of non-EU calls when certain conditions are met, requiring EU CPs to charge TRs aligned to intra-EU TRs.

Ofcom has confirmed that its proposal to introduce a reciprocity condition for international call termination remains unaffected, and it would appear that the existence of the Eurorates proposal would mean that rates between UK and the EU would be likely to remain low / at the level of domestic TRs. Our comments made in response to the consultation do not change as we still have concerns over the practicalities of implementing variable termination rates, which could impact on the overall fairness of the proposals, and we look forward to Ofcom's further analysis and consideration of this issue.