

BT Group's response to Ofcom's proposed Plan of Work

2025/26

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1 Executive Summary

We welcome the opportunity to comment on Ofcom's proposed plan of work. We agree with Ofcom that the current regulatory regime has been delivering good market outcomes for consumers on take up of fixed broadband and 5G, while providing ever faster speeds and greater coverage. We agree with Ofcom's prioritisation in the following areas, including:

- **Telecoms Access Review 2026 & Wholesale Voice Markets Review:** The current regulatory framework is working well and delivering good market outcomes — it is imperative that the regulatory environment remains stable to underpin telecoms as an attractive sector for investors overall, whilst recognising the progress that has been made in the fibre rollout and moving towards retirement of legacy networks.
- **Telecoms and Digital Infrastructure security:** following the implementation of the Telecommunications (Security) Act 2021 monitoring and reporting has been functioning well indicating operators of essential services are managing security risks effectively and we appreciate Ofcom's continual engagement with vendors and technical standards bodies to maintain broad understandings of the area.
- **Mobile coverage:** accuracy and consistency of available coverage as well as performance information is important for consumers now more than ever as the demand for services increases. BT continue to engage with and support Ofcom in exploring how consumers are provided with information relating to mobile services in a way that they can use most effectively.

We propose the following changes to Ofcom's plan:

- **Spectrum:** we propose a more open position is taken on hybrid sharing in the U6 GHz band given initial indications that managing interference adds disproportionate complexity.



2 We agree with Ofcom's prioritisation in the following areas:

2.1 Telecoms Access Review 2026 & Wholesale Voice Markets Review

We agree with the importance of reviewing the fixed telecoms market paying particular focus to the outcomes of consumers. Following the current regulatory regime provided via the Wholesale Fixed Telecoms Market Review 2021, there has been a record of delivering good market outcomes for consumers on both broadband and 5G, whilst providing faster speeds and greater overall coverage. As an example, over 30m (69%) of UK homes are now able to get full fibre, while 99% of the UK population have good 4G coverage and 95% of UK premises have a high confidence level of outdoor 5G availability.

BT agree with Ofcom's prioritisation of promoting fibre rollout, improving mobile coverage and resilience of communications networks and would encourage Ofcom to consider this through the lens of now providing regulatory conditions in which greater foster economic growth, provide capacity for innovation and align with approaches seen in European countries who have made huge progress with their fibre rollout and retirement of legacy networks.

As BT mentioned in the previous response to Ofcom's proposed plan of work for 2024/25, there have been substantive developments in voice markets since 2021, with the emergence of sustainable competition from number independent interpersonal communications services (NIICS) and substantial migration of customers to all-IP services. As we come to the end of the period covered under the Wholesale Fixed Telecoms Market Review (WFTMR) in which was delivered with the aim of prioritising world-class digital infrastructure, furthering the interests of telecoms consumers and secure and resilient telecoms infrastructure, the Telecoms Access Review 2026 & Wholesale Voice Markets Review should continue to enable the industry to deliver these outcomes, and will provide the much-needed regulatory certainty for the five years from April 2026 to March 2031.

2.2 Telecoms and Digital Infrastructure security: security & resilience policy development

BT agree that access to fast and reliable networks and services is of paramount importance, and that the security and resilience of networks to meet the demands of citizens ought to be a focus.

BT would emphasise the need to continue working with vendors and technical standards bodies to ensure a broad understanding of the evolving ecosystem to allow for appropriate guidance and support to be put in place to underpin compliance with security and resilience requirements. We would also highlight the importance of underpinning growth via pro-innovation via publishing clear, robust compliance guidance in emerging areas, such as telecoms security and resilience, which would provide greater certainty for industry and aid compliance.¹

¹ Department for Business & Trade, *Growth Duty: Statutory Guidance – Refresh* (Department for Business & Trade, 21 May 2024) p. 24

2.3 Mobile Coverage

BT continue to engage with Ofcom to improve the accuracy and consistency of the coverage and performance information that is currently available. BT support the exploration of additional and alternative measures of mobile coverage as well as the performance they can expect to receive from their mobile service. We would encourage Ofcom to ensure that any adjustments to mobile coverage reporting and performance measures be implemented in a way that is of most beneficial use to the consumer, minimises confusion and providing a real-world view whilst minimising the burden on providers.



3 We propose the following changes to Ofcom's plan:

3.1 Spectrum management and availability

We agree that spectrum should be used efficiently to benefit everyone in the UK with a focus on supporting economic growth and delivering improvements across mobile, satellite and unlicensed services. We acknowledge Ofcom are currently preparing to award the mmWave (26 and 40 GHz) spectrum as well as designing rules for the award of the 1.4 GHz spectrum, whilst simultaneously exploring the options for the upper 6 GHz band.

BT believe that Ofcom should develop a spectrum roadmap for national mobile networks that is wider than the mmWave and 1.4 GHz band. We suggest this should also include a review into the usage of the 3.8-4.2 GHz band, with a view to ensuring the bottom 300 MHz is predominantly reserved for high power applications by national operators, whilst retaining the top 100 MHz for low and medium power licences. Doing so would release a benefit for mobile users whilst still providing sufficient frequency bandwidth for low and medium power applications at specific locations and could deliver the greatest benefit for mobile users in the UK.

Further to this, we would suggest that any spectrum roadmap for national mobile networks also include the upper 6 GHz band as well as potentially the 600 MHz, to meet the future medium-term spectrum requirements for national mobile networks.





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