



Openreach's response to Ofcom's
"Ofcom's proposed plan of work 2025/26
Making communications work for everyone"

29 January 2025

Introduction

On 4 December 2024, Ofcom published its consultation document entitled "*Ofcom's Proposed Plan of Work 2025/26*" ("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 250 million kilometres of fibre optic cables and copper wires. To maintain and grow a network of this scale requires an exceptional team, and our 26,000 field engineers work around the clock, in all kinds of weather and in every community. Last year they completed 10 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 2025/26. 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. At the end of December 2024 our full fibre network reached 17 million premises. 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. We have an ambition to reach 30 million premises by the end of 2030.
4. Openreach will be retiring the PSTN network by 31 January 2027 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 are no longer providing new WLR lines. But with around 5m lines still left to convert there's still a lot of work to do.
5. A key pillar of Ofcom's "Internet and Post we rely on" priority will be this year's consultation on the TAR, leading to a statement by the end of the year. This will continue with the framework set out in the WFTMR that has supported investment in full fibre networks and created competition that is already benefitting consumers.
6. Stability is needed to support the significant investment that still needs to be made, while considering how to increase FTTP adoption in the remainder of the decade.
7. We welcome Ofcom's regular engagement with us on PIA and recognise the importance of working closely with Ofcom and our customers to understand and implement future requirements for the "In-Life/Living Together" phase and maintain the success of the product.

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.

8. Once we have rolled out full fibre in an area, we aim to migrate customers from copper services onto fibre as soon as practicable. This ensures that customers benefit from world class connectivity and will ultimately enable us to switch off our copper networks, thereby saving costs and energy.

Information gathering – managing the impact on stakeholders

9. We in Openreach take compliance with information requests very seriously. We work closely with Ofcom's Information Registry Team and very much value the coordination and engagement undertaken with stakeholders. Given the breadth of information Openreach provides to Ofcom as part of its required monitoring and analysis of the telecommunication industry, we welcome the establishment of an Ofcom internal senior cross-Group forum. This forum will give us the confidence that requests are proportionate and issued in a considerate way (e.g. deadlines and open requests are taken into account). This is key to ensure the business provides accurate, complete and timely responses.
10. We also note that Ofcom is simplifying the SIR templates for requesting information; updating the external webpage on information requests; and developing new software to streamline the process. If there are further pilots or trials to be commenced Openreach would be interested in participating in any review of Ofcom's information gathering approach.

Openreach supports Ofcom's emphasis on sustainability and climate change

11. 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.
12. 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.
13. 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.
14. We are very conscious of our carbon emissions, and we are determined to limit them and have spent the past year creating a comprehensive carbon footprint of our FTTP and FTTC networks. We will be a Net Zero business by 2031. 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.

15. 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.
16. 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, we aim to protect and enhance the natural habitats we encounter. This year we have created a Business Conservation Partnership with RSPB, using our ability to work at height to put up swift boxes. Swifts are on the UN red list as endangered.
17. 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

18. Openreach is one of the founding members of the Ofcom women in technology pledge – we are committed to increasing women’s representation in senior positions and are involved in the working party to achieve this aim.
19. Our SMT female representation grew to over 34% this year – that is the largest percentage since we started recording.
20. Our allies and networks continue to go from strength to strength, approaching 11,000 members, around a third of our organisation.
21. Two key policies we introduced this year were equalisation of family leave (non-birthing parents get the same amount of time off) and access to an online GP. These both positively impact all our colleagues.
22. Annually we publish Gender, Ethnicity and Disability pay gaps giving transparency about how we are measuring up to our own targets.
23. In preparation for legislation changes on sexual harassment we have conducted a full organisation risk assessment and are well under way with a response framework governed by our risk process.

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.

24. We're proud to have achieved ISO45001 (Occupational Safety and Health) and ISO55001 (Asset) certification and are the first telecommunications company to achieve the latter.
25. Openreach is enhancing our safety culture. We completed our classroom based 'Hearts and Minds' a dedicated safety culture training programme, attended by over 32,000 employees. We have now launched the next stage, beginning with manager 'Hearts and Minds MOTs', a 'check in' with first line managers, to ensure they have the tools to put people to work safely.
26. We are focussing on health and are working alongside the Health and Safety Executive and telecommunications industry body to improve health management in the industry.

Project Work for 2025/26

The following focuses on some of the key areas in Ofcom’s work plan for 2025/26 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.

Telecoms Fixed Access Review. The Telecoms Access Review 2026 will review the main fixed telecoms markets in the UK and put in place regulation which will apply for 5 years from 1 April 2026.

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- The WFTMR set out a framework based on the ‘fair bet’ principle, which allows investors to earn a fair return on their whole investment over that investment cycle and allowed wholesale prices to grow modestly in line with inflation to support the investment required. At the same time, Ofcom facilitated alternative network builders to invest by mandating regulated access to Openreach’s physical infrastructure (telegraph poles and underground ducts). This has been successful, with more fibre deployed than Ofcom had anticipated.
- During 2025/26 Ofcom will review responses to its (yet to be issued) consultation on the Telecoms Access Review (TAR). Ofcom stated they expected the WFTMR framework would be in place for at least 10 years, and Ofcom have re-iterated this over the last year. We agree that stability in the framework is essential given the level of investment in building and connecting fibre that is still to come.
- There are areas where Ofcom will need to further develop the framework. One area is the withdrawal of copper services, where Ofcom has a role in supporting migration away from copper as part of encouraging fibre adoption, which will become more key as we progress through the TAR period. Another area is how quality of service measures will need to adapt to reflect falling copper volumes.
- Ofcom also needs to consider the impact of the success of the WFTMR and the level of competition it has already stimulated. This means Ofcom should see if there are areas suitable for deregulation, or if not, establish the conditions for a finding of no Significant Market Power in an area. Ofcom should also ensure that all parties can compete fairly on the merits and not stifle competition.

Security and Resilience policy development programme. We will engage with the UK Government through the drafting & parliamentary passage of the Cyber Security & Resilience Bill. We will monitor and prepare for enhancements and expansions in our regulatory responsibilities and will continue to work with

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Government and report on obligations under the Telecoms Security Act and Network Information Security Regulations.	
Telecoms Security Act including security regime, High Risk Vendors and TBEST. We will proactively monitor communication providers' compliance with security regulatory obligations. We will continue to engage with industry to carry out our threat intelligence-led TBEST (penetration testing)	Ongoing
Telecoms Vendor Diversification. We will continue to enable newer vendors' ability to test technology in a commercially neutral environment through the 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 including the UK Telecoms Lab	Report Q1 2025/26

- 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 its 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, via BT Group, 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.

PSTN Switch Off. We will continue to work with Communications Providers and government to ensure issues raised by the migration to digital landlines, including the ongoing switch-off of the PSTN, are identified and addressed with the aim of protecting consumers from harm and minimising disruption	Ongoing
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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 this subject raise, 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 about unresponsive CPs and end 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 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.

Affordability. We will continue to monitor and report on affordability indicators for communication services every quarter. We will publish a report on social tariff availability and take-up figures as part of the pricing trends report

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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.

Protecting vulnerable consumers. We will continue to monitor whether providers, including smaller providers, are treating customers in vulnerable circumstances fairly and giving them the support, and services, they need. We will also continue to work with the UKRN to improve outcomes for vulnerable consumers.

Ongoing

- 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.
- To support vulnerable customers who have informed their CP that they have a telecare device, we are launching Prove Telecare in 2025. This will provide a safe and scalable way for CPs to migrate vulnerable customers to fibre, with Openreach engineers checking that telecare devices after the underlying telecoms service have been upgraded.

- Where CPs are unaware that a customer has a telecare device, we will continue to provide a “line of last defence” for vulnerable customers by forwarding back to CPs any migration order where we discover an unexpected telecare device. However, our engineers will not always notice telecare devices, and this could lead to telecare service being inadvertently disconnected when a customer migrates to fibre. We therefore urge Ofcom to work with government and other stakeholders to drive universal adoption of IP-compatible devices by telecare users.

Connected Nations. Following the publication of our annual UK report and four nations report in December 2024, covering fixed and mobile networks and network security / resilience, we will also produce a mid-year update and an update on planned network deployment data.

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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.