

Consultation response form

Please complete this form in full and return to planofwork@ofcom.org.uk

Consultation title	Consultation: Ofcom's Plan of Work 2026/27
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Confidentiality

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Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes

Your response

Question	Your response
Question 1: Do you have any comments on Ofcom's proposed Work of Plan for 2026/27?	Confidential? – N Please see below comments

Consultation: Ofcom's Plan of Work 2026/27

ISPA response

Contact: Policy@ispa.org.uk

About ISPA

1. ISPA is the trade association for ISPs in the UK. We represent more than 150 organisations that are building the communications infrastructure and delivering internet services that are powering the UK's economy and society. Our members are investing more than £50bn to upgrade the UK to full fibre gigabit broadband, with full-fibre now available at 78% of UK households, compared to just 6% in 2018¹ and over 85% of residential premises are able to receive gigabit speeds.
2. The rapid expansion of fast, reliable internet access has fundamentally reshaped our society and the rollout of full fibre gigabit broadband is one of the largest and most vital of the UK's infrastructure projects currently underway. Virtually all consumers, businesses and public sector entities rely on internet connectivity, making high-quality telecoms infrastructure crucial for driving growth, innovation, and opportunity.
3. This has been made possible from investment by a competitive market into the rollout of digital infrastructure, supported by a stable and consistent regulatory framework. Ensuring that everyone benefits from these advances remains a work in progress. We are entering the final and most complex stage of one of the most significant and successful infrastructure projects in recent memory.
4. Having progressed the rollout of gigabit-capable fibre, the market is now maturing with a more challenging investment landscape. Build is slowing and focused on

¹ Ofcom, [Letter to Prime Minister](#) (2026)

harder to connect and reach areas, and attention is turning to take-up alongside an anticipated wave of consolidation that will likely see fewer providers in the market in the medium term.

5. The industry needs a regulatory environment that fosters innovation and investment, supporting economic growth in line with the Government's agenda to ensure that it can continue to invest in next generation infrastructure, deliver excellent levels of service and meet the communications needs of the UK.
6. Against this background, ISPA welcomes the opportunity to respond to Ofcom's Plan of Work 2026/7, published in December 2025. ISPA agrees with Ofcom's goal of supporting a telecoms market where investment, innovation and competition can continue to thrive, where consumers have access to secure and reliable services and where they are treated fairly. In addition to the specific actions identified in the Plan of Work, ISPA would like to highlight some general observations, followed by comments on the following specific policy areas relevant to our members.

Introduction and general points

7. ISPA highlights the importance of maintaining a policy and regulatory environment that supports sustained private investment in UK digital infrastructure. Regulatory predictability and proportionate compliance burdens are critical to enabling long-term investment decisions, supporting competition and innovation, and delivering the connectivity outcomes needed for growth and resilience. This investment focus is particularly important in the context of the Government's ambition for nationwide gigabit connectivity, including the expectation that 99% of premises will have access to a gigabit-capable connection by 2032.²
8. In this sense, ISPA also encourages Ofcom to avoid unnecessary intervention that could undermine a competitive, well-functioning market that is delivering positive outcomes for consumers. Many of the consumer-focused initiatives introduced over the past five years are now beginning to deliver measurable benefits, and industry has invested significantly to implement them.
9. This has occurred against a challenging backdrop, including the post-pandemic recovery period, high inflation and interest rates, alongside substantial ongoing capital investment to expand and upgrade the UK's digital infrastructure. In this context, it is important that any further consumer interventions are

² Gov.uk, [Project Gigabit](#) (2025)

evidence-based, targeted and proportionate, and designed to avoid unintended consequences for investment and competition. Ofcom's own assessment in the letter recently sent to the Prime Minister reflects the progress achieved through this approach, highlighting that at the same time as rapid coverage improvements, the competition we have generated means full-fibre and gigabit broadband prices have been falling in real terms, so customers are getting better services for less at a time when the cost of living is so critical for so many households.³

10. Wholesale competition has played a central role in driving down prices and improving service quality, to the benefit of both retail providers and end-users. It is therefore vital that Ofcom maintains a competitive, pro-investment regulatory environment to sustain these outcomes over the long term.
11. These outcomes demonstrate the value of a framework that supports investment and competition; however, ensuring that everyone benefits from this progress also requires continued focus on digital inclusion. Therefore, ISPA and its members remain committed to advancing digital inclusion, including improving access to affordable, reliable connectivity and supporting initiatives that help eligible and vulnerable consumers to get online and stay online. ISPA recognises that, as gigabit-capable networks extend across the UK, it is essential that adoption keeps pace with availability so that households and communities can fully benefit from improved digital access. In line with this commitment, ISPA has contributed to the Government's Digital Inclusion Action Plan, and welcome working with Government, Ofcom, and other stakeholders to improve awareness of support available, reduce barriers to take-up, and help ensure that no one is left behind as the UK's communications networks evolve.
12. As the UK enters the final and most complex stage of nationwide network rollout, ISPA also encourages Ofcom and Government to prioritise action to remove practical barriers that slow the deployment and upgrade of digital infrastructure as this will be central in achieving national connectivity objectives. In particular, ISPA highlights the need for coordinated action to address constraints relating to High Risk Buildings, access challenges in multi-dwelling units (MDUs), and capacity constraints associated with power and other enabling infrastructure. Tackling these issues will support efficient deployment, reduce delays and costs, and help ensure that investment can continue at pace, especially in harder-to-reach premises where delivery is most complex.

³ Ofcom, [Letter to Prime Minister](#) (2026)

Priority 1: Internet and post we can rely on

13. **Telecoms Access Review (TAR) Implementation:** Given Ofcom's stated intention to monitor implementation and finalise regulation to support copper retirement, ISPA would welcome clearer articulation of the objectives, scope, and planned stakeholder engagement for 2026/27.
14. **Telecoms and Digital Infrastructure Security and Security and Resilience Supervision:** We support Ofcom's intention to enhance supervision approach to ensure networks are secure and resilient. ISPA would welcome continued structured engagement as a representative body for UK ISPs in the process of updating the Telecoms Procedural Guidance to help ensure the revised procedural guidance is practical, proportionate, and supports consistent outcomes across provider types. Specifically, Ofcom should do more to explain and engage how it is using its significant new powers in cybersecurity provided by the telecoms security regime. Having been implemented several years ago, and off the back of a large volume of information requests, what has Ofcom learned from this and how will it impact future work in this area? ISPA encourages Ofcom to reduce the impact of the rolling information request process under the Telecoms Security Act, particularly for smaller providers, given the significant resources required and the potential distraction from essential operational security activities. A more proportionate, risk-based model for ongoing information gathering would help ensure that regulatory oversight strengthens, rather than disrupts, day-to-day security and resilience work.
15. **Cyber Security and Resilience Bill:** ISPA also notes the forthcoming Cyber Security and Resilience Bill and updated NIS regulations, which will introduce an additional layer of security obligations for many providers that are already subject to the Telecoms Security Act, or to NIS2 requirements in the EU, and therefore face overlapping or parallel regimes. ISPA encourages Ofcom and Government to adopt a proportionate approach that avoids creating another framework, instead prioritising consistency, clear alignment with recognised international standards, and mutual recognition of equivalent compliance efforts. We would also discourage an oversight model for the CSR framework that mirrors TSA-style rolling information requests, given the administrative burdens these can impose and the risk they displace resources from core operational security and resilience activities.
16. **Consumer Supervision Programme:** We support Ofcom's continued evidence-based approach to consumer supervision. In parallel, ISPA would welcome Ofcom engaging with this work and ensuring that any enhancements to

the Consumer Supervision Programme and any further interventions in relation to mid-contract price rises are: evidence-led, drawing on robust data about consumer outcomes and market behaviour; proportionate, targeted at clearly identified harms, including for customers in vulnerable circumstances; and implementable across the market, with sufficient lead-in times and clarity to allow providers of all sizes to comply effectively. Additionally, ISPA and its members remain committed to supporting take-up and awareness of affordable connectivity options, including social tariffs. We would welcome continued collaboration with Ofcom and Government to improve consumer understanding of available support, and ensure that households and businesses, particularly those in vulnerable circumstances or on low incomes, can access a decent, affordable broadband connection. This approach will help ensure that supervision and any additional measures complement ongoing industry and government efforts on transparency, maximise positive outcomes for consumers (including those on social tariffs), and avoid unnecessary complexity or duplication.

17. Migration from legacy services: ISPA supports Ofcom's continued work to identify and address issues arising from the migration to digital landlines, including PSTN retirement, with the aim of protecting consumers and minimising disruption. ISPA would welcome continued joined-up engagement across Ofcom, DSIT, providers and the wider ecosystem and maintaining a strong focus on outcomes for vulnerable consumers and those reliant on services historically delivered over analogue lines. We also encourage ensuring expectations around resilience (including during power outages) remain proportionate and workable across different provider types.

Priority 2: Media we trust and value and Priority 3: We live a safer life online

18. Setting and Enforcement of Content Standards and Additional Safety Measures: ISPA supports Ofcom's role in setting and enforcing content standards to protect audiences from harmful content and uphold due accuracy and due impartiality in news and current affairs. As Ofcom's remit evolves through the Online Safety Act, ISPA notes that, where Ofcom uses its Online Safety Act powers to pursue Business Disruption Measures (including potential access restriction measures directed at platforms), implementation could have operational and technical implications for ISPs. ISPA therefore encourages Ofcom to: engage early and closely with ISPs on any prospective use of Business Disruption Measures, to fully understand network-level impacts and technical feasibility; ensure measures

are proportionate, targeted and clearly scoped, with appropriate safeguards to avoid unintended consequences for network performance or lawful content; and provide clear, timely guidance and reasonable implementation timelines, so that ISPs can plan, resource and implement any required technical changes effectively. This approach will help ensure that the use of Business Disruption Measures is both effective in tackling harmful content and operationally workable for ISPs, while maintaining a resilient and reliable connectivity environment for users.

Priority 4: Enabling wireless services in the UK economy

19. **Meeting the evolving demands for spectrum for space-based services and for wireless broadband and increasing the efficient use of spectrum:** ISPA would welcome ongoing engagement to ensure the framework supports innovation while providing regulatory certainty as timely, predictable and flexible access to spectrum access is increasingly important to unlock investment and innovation. Within this, ISPA would support further improvements to the Shared Access licensing regime to make it more user-friendly and innovation-focused. This could include continued modernisation of Ofcom's tools and propagation models, offering pre-application engagement for more innovative or complex deployments, and to streamline application and billing processes, exploring options such as clearer support for campus-style or large-site deployments. These changes would support more efficient use of spectrum while providing greater certainty and flexibility for innovators and investors.