

# Can UK policy deliver the resilience tomorrow's communications networks will need?

*June 2026*

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The UK's communications market is undergoing a significant technological shift. Legacy communications platforms including digital terrestrial television, copper telephony, 2G and Airwave are being retired, which raises urgent questions about how national network resilience will be maintained and expanded. However, the policy debate remains fragmented across individual sectors, and competitive market structures make it harder to develop cross-sector solutions.

## **Greater transparency is needed, alongside a clearer debate on funding**

There is little transparency about the resilience that different forms of communications networks actually provide today. At the EU level, the proposed Digital Networks Act (DNA) aims to introduce a duty for digital infrastructure providers to co-operate on resilience and security issues. Although the UK is no longer part of the EU, many providers operate across both markets and communications policies in the UK and EU remain closely aligned. As digital dependency deepens across households, businesses and essential services, the consequences of outages become more severe. Yet the robustness of a system is not always apparent until there are issues. End users may know the price of a service and its advertised speed, but not the extent of its back-up power, failover capability, restoration processes or exposure to common dependencies. This makes it harder for customers and policy makers to judge whether the UK's resilience baseline is adequate for a more digitally dependent economy.

There is, however, a growing consensus that this is becoming a high-priority issue at policy level. Communications providers, broadcasters, infrastructure operators and individual user sectors all have reasons to worry about resilience during a period of technological transition and rising climate, security and operational risk. The individual user sectors such as transport, energy and water operate on different investment cycles, under different regulatory incentives and with different capacities to pay, making collective solutions to fund additional telecoms resilience difficult, even when the strategic problem is widely recognised.

## **The case for resilience is clear, but delivery is not**

Policy makers increasingly recognise communications resilience as a strategic priority. In the UK, the Department for Science, Innovation and Technology now treats telecoms as part of critical national infrastructure, and Ofcom has strengthened its resilience guidance for communications

providers. However, policy is clearer on the strategic direction of communications resilience than on how resilience will actually be delivered. Policy makers want more resilient networks, yet there remains little clarity on how new obligations should be prioritised across technologies or funded in practice.

Assuming that communications providers will absorb much of the cost of higher resilience standards may prove unrealistic. Resilience often depends not on a single network, but on the interaction between mobile, fixed, media, transport and energy systems, alongside the cloud, core and backhaul systems that support them. A policy that simply places extra obligations on individual providers risks missing the fact that resilience is systemic and cross-sectoral.

This matters because the UK communications sector is entering a period of parallel infrastructure transition. Digital terrestrial television (DTT), analogue copper telephony, 2G mobile services and the Airwave-era mode of mission-critical public-safety connectivity are all being reconsidered or retired within different government policy programmes and/or via commercial planning of network retiral. Each of these legacy systems offers distinct resilience characteristics. The DTT network was designed to deliver near-universal television coverage, while copper and 2G networks have supported highly reliable voice access across much of the country. Public-safety systems, meanwhile, were built around resilience requirements specific to that user community.

Today's resilience baseline has been built up over time through direct or indirect public support. The UK's DTT network has been underpinned by funding provided through public service broadcasting, especially the BBC's funding model. Areas such as public safety have also developed dedicated communications platforms through centrally funded programmes led by different government departments. Parts of mobile and fixed networks in harder-to-reach areas have likewise been built aided by public funding or with policy support. In other words, the performance and resilience embedded in legacy networks was often subsidised, co-ordinated or mandated. It is therefore risky to assume that a competitive and commercially fragmented next-generation market will automatically reproduce the same outcomes unaided.

## **Fragmented policy making and complexity make resilience hard to deliver**

Policy conversations are taking place separately on the future of broadcasting, the resilience of mobile radio access networks, the retirement of the public switched telephone network (PSTN), data centre dependencies, subsea infrastructure and wider critical infrastructure planning. But these debates are unlikely to result in good outcomes if they do not account for interdependencies.

Part of the difficulty is that resilience means different things to different users. For many consumers, it simply means that services keep working. Few will know, for example, that mobile networks are not universally engineered to maintain service for long periods through major power outages, or that digital voice services can fail if local power is lost. For user sectors such as energy, utilities, transport and public safety, resilience has a much more operational meaning. It

may involve guaranteed back-up power, geographically diverse routing, dual connectivity, rapid restoration capability or tighter protections against software and cyber failure. A single definition is unlikely to cover all use cases.

The complexity does not stop within telecoms. Major user sectors have evolved around their own communications arrangements, procurement structures and operational priorities.

Communication needs for the UK's different transport systems differ between road, rail, bus, maritime and aviation. Energy and water industries – themselves part of a wider utilities sector – are organised through different regional structures, regulatory regimes, funding models and risk frameworks. Even within a single sector, resilience expectations and technical solutions may vary significantly between organisations. This makes it difficult to define a single national resilience standard, but it also strengthens the case for a clearer cross-sector framework to identify which functions are most critical, what performance is required and which responsibility should sit between providers, users and the state.

## **Competitive markets are not designed to deliver resilience**

This points to a more fundamental issue. Competitive market structures in mobile and fixed communications are generally good at promoting efficiency, innovation and consumer choice. They are less well suited to delivering resilience as a public good. If policy makers conclude that the market will not voluntarily fund the level of resilience that society needs, they may need to legislate for clearer resilience outcomes, define priority use cases and establish funding mechanisms that reflect the public value being created. Those mechanisms could take many forms, including targeted public funding, pooled industry contributions or the redirection of existing sectoral charges.

The UK is right to put communications resilience high on the policy agenda, but hard questions lie ahead. Are the current policy foundations for critical national infrastructure sufficiently coherent across broadcasting, telecoms and other essential sectors? Is there enough clarity on what different resilience requirements mean in operational terms? Can government expect commercial investment alone to meet rising resilience expectations? If not, what form of co-ordination, legislation and funding will be needed to close the gap?

## **Find out more**

Building a coherent national resilience strategy will require a holistic approach that reflects differing requirements, incentives and market structures across the communications, energy and broadcasting sectors in the UK.

Analysys Mason helps clients assess resilience requirements, delivery models and funding options across complex, interdependent communications ecosystems. Contact us to discuss your approach to network resilience.