

**Debate Pack**

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# Proposed merger between Three UK and Vodafone

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# 1 Background

A debate is scheduled to be held on 19 September 2023 at 2:30pm in Westminster Hall on the proposed merger between Three UK and Vodafone. The debate is sponsored by Navendu Mishra (Lab).

## 1.1 Mobile network operators

Mobile networks (including masts and antenna) are built by telecoms companies called mobile network operators (MNOs). Since 2010, when T-Mobile and Orange merged to become EE, there have been four MNOs in the UK. They are: Vodafone, Three, O2, and EE.

Each of the MNOs offers mobile services to customers. MNOs also act as wholesalers, selling network access to other telecoms companies who do not have their own network infrastructure. These companies, called mobile virtual network operators (MVNOs), use MNOs' networks to provide services to customers. MVNOs include Tesco Mobile and GiffGaff.

The telecoms market is regulated by Ofcom. According to Ofcom's [2023 Technology Tracker survey](#), Vodafone and Three (plus the MVNOs using their networks) hold around 19% and 11% of the consumer mobile market respectively. This makes Vodafone and Three the third and fourth largest MNOs, behind O2 (around 35%) and EE (around 31%).<sup>1</sup>

## 1.2 Views on mobile market consolidation

In the [press release announcing their proposed merger](#), Vodafone and Three UK argued that they are “sub-scale” based on their current market share, meaning that they are “unable to recover their cost of capital”.<sup>2</sup> The proposed merger would create an MNO of comparable size to O2 and EE. According to the press release, the merged company would be able to increase investment in mobile networks and be better able to compete for retail and wholesale customers:

The merger will create a third operator with scale, levelling the competitive playing field, increasing competition to the UK's two leading converged operators and will also provide more choice in wholesale partners for the UK's already competitive MVNOs.

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<sup>1</sup> Ofcom, [Technology tracker 2023 data tables](#) (PDF), June 2023, Table 49

<sup>2</sup> Vodafone, [Merger of Vodafone UK and Three UK to create one of Europe's leading 5G networks](#), 14 June 2023

In a February 2022 [discussion paper on the future of mobile markets](#) (published before the proposed Vodafone-Three merger was made public), Ofcom acknowledged that competition in the mobile market could be weakened if one or more of the MNOs did not have sufficient scale to compete with the others. This could reduce the smaller MNO's ability or incentive to invest in their network, and also reduce the competitive pressure on other MNOs to invest.<sup>3</sup> It did not specifically state that this was an issue in the current market.

Three's [response to Ofcom's discussion paper](#) pointed to evidence from other European countries which it said shows that markets with three MNOs generally have better quality networks, faster 5G rollouts, and do not necessarily have higher prices. It concludes:

Competition policy should prohibit mergers that reduce output and raise prices, not those that expand capacity and output, improve quality, and lower prices. Opposing consolidation today does not benefit consumers – it only impedes the UK's digital ambitions by making it more costly to expand capacity, extend 5G into rural areas and deliver the full potential of 5G.<sup>4</sup>

In a BBC Article it was reported that Karen Egan, head of mobile at research firm Enders Analysis, said similar deals in other countries [had not led to price hikes](#) as consumers benefit from funding fewer nationwide networks.<sup>5</sup>

By contrast, a report by anti-monopoly organisation the Balanced Economy Project looked at seven empirical studies from around the world and found that market consolidation [would increase consumer prices and have no net effect on investment](#):

Four firms compete for customers more intensively than three do, and they feel more pressure give their customers good prices (and services.)

...

Indeed, there are strong grounds for arguing that the difference between four and three players marks a particularly dangerous threshold to cross, between (relatively) competitive markets and markets characterised by what has been called "tacit semi-collusion" between players which could involve, for example, de facto price-fixing and other coordinated activities.<sup>6</sup>

The report concludes that reducing the number of MNOs from four to three would increase consumer prices by 15-50%. It calculates that this equates to £5-25 per month for the average UK mobile subscriber.

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<sup>3</sup> Ofcom, [Discussion paper: Ofcom's future approach to mobile markets](#), 9 February 2022, p63

<sup>4</sup> Three UK, [Three's response to Ofcom's future approach to mobile markets: discussion paper](#), April 2022, p4

<sup>5</sup> BBC News, [Vodafone Three deal to create UK's largest mobile firm](#), 14 June 2023

<sup>6</sup> Balanced Economy Project, [The perils of the Vodafone-Three merger](#), April 2022

The Balanced Economy Project report was cited by Unite the Union in a briefing on the merger.<sup>7</sup> Unite is opposing the deal on competition and national security grounds.<sup>8</sup> Gail Cartmail, Unite’s executive head of operations, said:

This deal will give a company [Three] with deep ties to the Chinese state an even more prominent place at the heart of the UK’s telecommunications infrastructure. On top of that, it will hike people’s bills and mean job losses for Vodafone and Three workers. The government must step in and stop this reckless merger and Unite is building a cross-party coalition to demand they do so.<sup>9</sup>

The consumer group Which? similarly said that “reducing the number of network providers from four to three [risks reducing the choices available to consumers](#), raising prices and lowering the quality of services available.”<sup>10</sup>

## Ofcom’s and the government’s views

Ofcom published its [conclusions on the future of mobile markets](#) in December 2022. It acknowledged the evidence put forward by Three but said that it did “not consider this as conclusive of the benefits of consolidation in the UK”.<sup>11</sup> Ofcom said that it would judge proposals for market consolidation on a case-by-case basis:

We continue to take the view that the question of whether a particular merger is likely to result in a substantial lessening of competition will turn on the effectiveness of competition that can be expected in the market after the merger, rather than just the number of competitors. Our stance on a potential merger would therefore be informed by the specific circumstances of that particular merger, taking into account how markets are evolving and functioning.

We are therefore confirming that any future mergers would need to be assessed on a case-by-case basis, rather than on a presumptive view of the appropriate number of competitors.<sup>12</sup>

This was reported in the press as a softening of Ofcom’s stance on MNO consolidation, compared to its opposition to Three’s proposed takeover of O2 in 2015.<sup>13</sup>

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<sup>7</sup> Unite the Union, [Vodafone-Three merger: consumer dossier](#), June 2023

<sup>8</sup> Unite the Union, [The Three-Vodafone Merger: Myths and Reality](#), accessed 14 September 2023; Unite the Union, [Three UK -Vodafone merger: national security implications](#), July 2023

<sup>9</sup> Unite the Union, [Unite to send delegation to Vodafone AGM to challenge ‘reckless merger’ with Three](#), 24 July 2023

<sup>10</sup> Which?, [Which? responds to the news that Vodafone and Three have agreed a UK merger](#), 14 June 2023

<sup>11</sup> Ofcom, [Conclusions: Ofcom’s future approach to mobile markets](#), 6 December 2022, p35. Ofcom briefly covers the evidence on the benefits of market consolidation on page 74 of the [February 2022 discussion paper](#).

<sup>12</sup> Ofcom, [Conclusions: Ofcom’s future approach to mobile markets](#), 6 December 2022, p35

<sup>13</sup> Guardian, [Price hike fears as Ofcom softens stance on mobile firm mergers](#), 9 February 2022

The government said in its 2023 [Wireless Infrastructure Strategy](#) that it agreed with Ofcom's view that "that the impact of consolidation on the market will be highly contextual and specific and must be assessed on a case-by-case basis."<sup>14</sup>

## 1 Previously blocked Three/O2 merger

A previous attempt at market consolidation took place in 2015, when CK Hutchison 3G (the owner of Three UK) sought to acquire O2. The deal was opposed by Ofcom and the Competition and Markets Authority.<sup>15</sup> It was blocked by the European Commission on the grounds that it would increase prices, reduce choice, and have a negative impact on network innovation and investment.<sup>16</sup>

Following an appeal, the Commission's decision was annulled by the General Court of the European Union in 2020.<sup>17</sup> The General Court's ruling said that the Commission had failed to prove to the requisite standard that Three's acquisition of O2 would damage competition.

The Commission appealed to the Court of Justice of the European Union (CJEU). In July 2023 the CJEU ruled that the General Court had applied an incorrect standard of proof. It annulled the General Court's decision and sent the case back for re-determination.<sup>18</sup>

## 1.3

## UK Competition regime

Competition law seeks to curb practices that undermine or restrict competition to the detriment of consumers. This includes the abuse of a dominant market position by a firm, anti-competitive agreements between firms, and mergers or takeovers which, if allowed, would result in a substantial lessening of competition.

In the UK, primary responsibility for enforcing competition law lies with the Competition & Markets Authority (CMA). The legislative framework for the UK

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<sup>14</sup> Department for Science, Innovation and Technology, [UK Wireless Infrastructure Strategy](#), 11 April 2023

<sup>15</sup> Guardian, [Ofcom chief expresses concern over potential O2 and Three merger](#), 7 October 2015; CMA, [CMA requests UK review of O2/Three merger](#), 2 October 2015

<sup>16</sup> European Commission, [Mergers: Commission prohibits Hutchison's proposed acquisition of Telefónica UK](#), 11 May 2016

<sup>17</sup> DLA Piper, [Three/O2 – all you can eat merger control?](#), 9 September 2021

<sup>18</sup> Reuters, [Fresh M&A blow for telcos as Three/O2 debate reopened](#), 13 July 2023

regime is established by the [Competition Act 1998](#) and the [Enterprise Act 2002](#), as amended by the [Enterprise and Regulatory Reform Act 2013](#), which created the CMA. The Government has limited powers to intervene in either the assessment of mergers or the investigation of markets.

Individual sector regulators – such as Ofcom (communications), Ofgem (gas and electricity) and the Financial Conduct Authority (financial services) – have similar powers to investigate competition in their own fields.

There is further detail in the Library briefing on [the UK competition regime](#).

## The Role of the Competition and Markets Authority in mergers

Vodafone announced that its merger with Three would be subject to clearance from the CMA and it has been reported that the CMA has confirmed it will examine the merger.<sup>19</sup> Completion of the transaction is expected to occur before the end of 2024, subject to regulatory and shareholder approvals.<sup>20</sup>

The CMA may review a merger either where it receives formal notification from businesses or where it initiates its own investigation. When investigating a merger, the CMA has a statutory deadline of 40 working days to complete the initial stage of its review (known as Phase 1). If at the end of Phase 1 the CMA determines that the merger results in a realistic prospect of a substantial reduction of competition, it has a duty to launch an in-depth assessment (Phase 2). At Phase 2, a CMA panel of independent members assesses whether the merger is expected to result in a substantial lessening of competition. If so, the CMA decides upon the remedy, which could include prohibiting the merger or requiring the sale of parts of the business.<sup>21</sup> This is usually limited to 24 weeks.

The Business Secretary appoints the chair and the chief executive, as well as members of the CMA board (which exercises the functions of the CMA and is responsible for Phase 1 merger decisions) and a CMA panel (which contains independent experts and makes Phase 2 merger decisions).<sup>22</sup>

The CMA will consider whether a merger would lead to:

- (a) the merged entity being able to profitably and unilaterally raise its prices, worsen its quality or service and non-price factors of competition, or reduce innovation efforts at one or more of the pre-merger businesses;

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<sup>19</sup> Vodafone, [Merger of Vodafone UK and Three UK to create one of Europe's leading 5G networks](#), 14 June 2023

<sup>20</sup> [As above](#)

<sup>21</sup> Competition and Markets Authority, [A Quick Guide to UK Merger Assessment](#) (PDF), 18 March 2021

<sup>22</sup> [Enterprise and Regulatory Reform Act 2013, Schedule 4](#)

(b) coordination occurring between some remaining suppliers or becoming more stable as a result of the merger; or

(c) the foreclosure of rivals when the merger is between firms at different levels of a supply chain or when the merger is between firms in different markets which are nevertheless related in some way.<sup>23</sup>

If, following a Phase 2 assessment, the CMA decides that a merger gives rise to a substantial lessening of competition (SLC), it will take steps to remedy the effects. For an anticipated merger, this will often mean that the merger is prohibited, although it could be allowed to proceed subject to suitable conditions, for example a divestiture (sale) of part of the business to be acquired.

## Digital Markets, Competition and Consumers Bill

The Digital Markets, Competition and Consumers Bill, which is currently before the House of Commons, would make changes to the merger notification regime.

The Bill would introduce more stringent requirements to inform the CMA and await the CMA ‘accepting the report as sufficient’ before mergers are allowed to occur. It also outlines the ‘tests’ required to confirm whether CMA approval is needed for the merger to take place.

Further detail is available in the Library briefing [Digital Markets, Competition and Consumers Bill 2022-23: Digital markets and competition provisions](#), in particular section 2.2, clauses 55-56 and section 3.3, clauses 124-128.

## 1.4

## National Security and Investment Act 2021

Navendu Mishra MP who called the debate has raised concerns around national security stating that the merger:

could pose a national security risk by giving a company whose controlling family collaborates with the Chinese state an even more influential role at the heart of our sensitive telecoms infrastructure.<sup>24</sup>

Three is owned by CK Hutchinson Holdings Limited which is listed on the Hong Kong Stock Exchange. In July 2023, Unite the Union said it would send a delegation to Vodafone’s AGM to challenge its merger with Three, stating that:

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<sup>23</sup> Competition and Markets Authority, [A Quick Guide to UK Merger Assessment](#) (PDF), 18 March 2021

<sup>24</sup> [HC Deb 11 May 2023, vol 732 c458](#)

Three's owner CK Hutchison has close links with the Chinese state, while Vodafone holds a number of UK public sector contracts, including with the Ministry of Justice, the NHS and numerous police forces.<sup>25</sup>

In June 2023, a Vodafone press release said that after the merger, Vodafone would own 51% and CK Hutchinson Holdings Limited would own 49%. The press release said that the transaction would be subject to approval under the National Security and Investment Act.<sup>26</sup>

The [National Security and Investment Act 2021](#) introduced a regime for reviewing and intervening in business transactions which might raise national security concerns. The list of industries covered as [notifiable acquisitions](#) under the Act includes communications. The guidance describes the communications sector, and confirms that acquisitions in the sector are likely to be reportable to the government's Investment Security Unit, and will therefore likely need approval under the Act:

The communications sector is a diverse, technologically advanced and constantly evolving. It is integral to national security, the economy and society as it supports the operations of businesses, public safety organisations, government, the wider public sector, other critical national infrastructure and citizens. The mandatory notification requirements include many of the most significant providers within the sector.<sup>27</sup>

Further detail on the National Security and Investment Act is available in the Library briefing [National Security and Investment Bill 2019-21](#).

## 2 Cybersecurity of telecoms network

Providers of public electronic communications networks and services have cybersecurity obligations under the [Communications Act 2003](#). Sections 105A to 105Z29 of the 2003 Act were added by the [Telecommunications \(Security\) Act 2021](#). The amendments followed concerns raised in the government's 2018 [telecoms supply chain review](#) about the resilience of UK communications networks to hostile cyber activity.

Under the new provisions the 2003 Act now requires telecoms providers to take measures to identify and reduce the risks of security compromises. The definition of 'security compromise' includes:

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<sup>25</sup> Unite the Union, [Unite to send delegation to Vodafone AGM to challenge 'reckless merger' with Three](#), 24 July 2023. A detailed briefing on Unite's concerns about national security is available at Unite the Union, [Three UK -Vodafone merger: national security implications](#), July 2023

<sup>26</sup> Vodafone, [Merger of Vodafone UK and Three UK to create one of Europe's leading 5G networks](#), 14 June 2023

<sup>27</sup> Cabinet Office, [National Security and Investment Act: details of the 17 types of notifiable acquisitions](#), 27 April 2023



- Anything that could undermine the availability, functionality, or performance of the network or service;
- anything that could compromise the confidentiality of data sent over the network;
- anything that could cause data sent over the network to be lost, altered, or stolen.

New regulations and guidance introduced under the 2021 Act impose legally binding minimum security requirements on telecoms providers. For example, under regulation 5 of the [Electronic Communications \(Security Measures\) Regulations 2022](#) tools that network operators use to monitor the operation of their network must not be located in or accessible from Russia, China, Iran, or North Korea.

Ofcom is responsible for enforcement.

Further information can be found in the Library briefings, [Telecommunications \(Security\) Bill](#) (November 2021) and [Cybersecurity in the UK](#) (June 2023).

## 2

### Press articles, blogs and insights

[Vodafone revenues boosted by price rises as turnaround continues](#)

Financial Times [Paywall]

24 July 2023

[Why Vodafone's megamerger could have a 3.9% problem](#)

Financial Times [Paywall]

17 July 2023

[Fresh M&A blow for telcos as Three/O2 debate reopened](#)

Reuters

13 July 2023

[Good things come in Threes? Examining the Vodafone/Three merger](#)

St Andrews Law Review

Joy Lee

13 July 2023

[Vodafone warns of investment cuts if Three merger is blocked](#)

Total Telecom

10 July 2023

[China links risk £18bn mobile deal](#)

Times

26 June 2023

[Vodafone-Three merger a medium-term credit positive](#)

Fitch Ratings

22 June 2023

[Vodafone's merger with Three is an open and shut case of a monopolistic power](#)

City AM

Max Von Thun

19 June 2023

[Vodafone and Three UK sign agreement for mobile mega merger](#)

ISP Review

14 June 2023

[Vodafone, Three Merger: Industry Reaction](#)

Silicon UK

14 June 2023

[The Vodafone-Three merger could be a Brexit win](#)

Spectator

14 June 2023

[Three CEO calls for "structural change" in mobile market amid rumour of Vodafone merger](#)

IT Pro

Sabina Weston

18 March 2022

[Vodafone and CK Hutchison poised to unveil £15bn UK mobile tie-up](#)

Financial Times [Paywall]

May 2023

[Price hike fears as Ofcom softens stance on mobile firm mergers](#)

Guardian

9 February 2022

[Three/O2 - all-you-can-eat merger control](#)

DLA Piper

Darach Connolly

9 September 2021

[Ofcom chief expresses concern over potential O2 and Three merger](#)

Guardian

7 October 2015

## 3

### Press releases

[Unite to send delegation to Vodafone AGM to challenge ‘reckless merger’ with Three](#)

Unite the Union

24 July 2023

[The Government must block “reckless” merger of Vodafone and Three](#)

Unite the Union

14 June 2023

[Which? responds to the news that Vodafone and Three have agreed a UK merger](#)

Which?

14 June 2023

[Merger of Vodafone UK and Three UK to create one of Europe's leading 5G networks](#)

Vodafone

14 June 2023

[The perils of the Vodafone-Three merger](#)

Balanced Economy Project

6 April 2022

[Mergers: Commission prohibits Hutchison's proposed acquisition of Telefónica UK](#)

European Commission

Proposed merger between Three UK and Vodafone

11 May 2016

[CMA requests UK review of O2/Three merger](#)

Competition and Markets Authority

2 October 2015

## 4

# Parliamentary material

[Northern Ireland Office: Vodafone Group](#)

**30 June 2023 | PQ 190659**

**Asked by: Charlotte Nichols**

To ask the Secretary of State for Northern Ireland, what assessment he has made of the potential effect of the merger between Three and Vodafone on her Department's contracts with Vodafone.

**Answered by: Steve Baker | Department: Northern Ireland Office**

As an open economy, this Government welcomes and encourages investment where it supports the Prime Minister's goal of boosting UK growth and jobs, meets our stringent legal and regulatory requirements, and does not compromise our national security. The Government has robust powers under the National Security & Investment Act, which it introduced, to block or impose remedies on transactions that pose a national security risk.

We cannot comment on specific acquisitions nor the applicability of the National Security and Investment regime.

It is the responsibility of the Competition and Markets Authority (CMA) to assess the impact on consumers and competition in the market, with input from sectoral regulators.

The Investment Security Unit works closely with the Competition and Markets Authority on cases that are being considered for both national security and competition reasons. A memorandum of understanding has been agreed between the Investment Security Unit and the CMA to assist joint working.

<https://www.gov.uk/government/publications/operation-of-the-national-security-and-investment-act-2021-memorandum-of-understanding/mou-between-beis-and-the-cma-on-the-operation-of-the-national-security-and-investment-act-2021>

[Three: Vodafone](#)

**29 June 2023 | PQ 190958**

**Asked by: Martyn Day**

To ask the Secretary of State for Science, Innovation and Technology, whether her Department has made an assessment of the potential impact of the proposed merger between Three UK and Vodafone on the security of jobs in

the UK [[PQ 190958](#)]; on (a) mobile phone and (b) broadband costs [[PQ 190957](#)]; on national security [[PQ 190956](#)].

**Answered by: Sir John Whittingdale | Department: Science, Innovation and Technology**

On June 14, Vodafone and Three announced their intentions to merge their UK businesses. As an open economy, we welcome investment where it supports UK growth and jobs, meets our stringent legal and regulatory requirements, and does not compromise our national security. We will not hesitate to use our powers, under the National Security and Investment Act, to protect national security if we identify concerns.

The Government does not have a role in the review of mergers on competition grounds. It is the responsibility of Competition and Markets Authority (CMA) to assess the impact on consumers and competition in the market, with input from sectoral regulators - in this case Ofcom.

At present Vodafone UK have not announced any job cuts in relation to the merger. On 16 May, Vodafone Group, which operates across 21 countries, announced its annual financial results and strategy to improve performance. The announcement included an indication that Vodafone Group plans to cut 11,000 jobs globally over 3 years. Any redundancies are a commercial decision for Vodafone Group.

#### [Mobile phones: competition](#)

**27 June 2023 | PQ190732**

**Asked by Nadia Whittome**

To ask the Secretary of State for Science, Innovation and Technology, what assessment her Department has made of the adequacy of competition in the mobile network operator sector.

**Answered by: Sir John Whittingdale | Department: Science, Innovation and Technology**

Any proposal to merge mobile network operators needs to be looked at by the Competition and Market Authority (CMA). The government does not have a role in the review of mergers on competition grounds. It is the responsibility of CMA to assess the impact on consumers and competition in the market, with input from sectoral regulators.

Strong competition in the UK mobile market has produced good outcomes for consumers and businesses to date, in terms of costs, choice and quality of service. UK prices for mobile services are some of the lowest in Europe. In addition to the four national mobile network operators (MNOs) (BT/EE, VMO2,



Vodafone and Three), consumers and businesses can also buy services from mobile virtual network operators (MVNOs). The UK MVNO market is strong, representing 27% of mobile subscribers in the market.

Competition has encouraged the four MNOs to invest to extend and upgrade their networks. 4G coverage currently extends to 92% of the UK landmass from at least one MNO, and our Shared Rural Network programme will extend this to 95%. All four MNOs launched their 5G networks in 2019 and last year we met our ambition to deliver a basic 5G signal for the majority of the population by 2027 - 5 years early.

Our recently published [Wireless Infrastructure Strategy](#)[\(opens in a new tab\)](#) set out a new ambition for nationwide coverage of standalone (high-quality) 5G to all populated areas by 2030.

### [Business of the House](#)

**HC Deb 11 May 2023 c458**

**Asked by: Navendu Mishra:**

I refer the House to my entry in the Register of Members' Financial Interests. Recent media reports inform us that Vodafone UK and Three are in advanced talks about a merger, but my trade union, Unite, is campaigning against it on two major grounds. First, it could pose a national security risk by giving a company whose controlling family collaborates with the Chinese state an even more influential role at the heart of our sensitive telecoms infrastructure. Secondly, the merger would fatally undermine competition by reducing the number of major providers in the British telecoms market, resulting in substantially higher prices for British consumers. As such, will the Leader of the House allocate Government time for a debate on the merger, as it will impact people in each and every constituency across the UK?

**Answered by: Penny Mordaunt | Leader of the House of Commons**

The next opportunity for the hon. Gentleman to raise this issue with the Department for Business and Trade will be on 18 May, but I know that it will be a matter of concern to two other Departments, so I will write to all of three on his behalf and ask them to contact his office.

## 5

# Further reading

### Library briefings:

- [Cybersecurity in the UK](#), Commons Library briefing, 22 June 2023
- [Mobile and broadband: affordability and consumer protection](#), Commons Library briefing, 28 November 2022
- [The UK competition regime](#), Commons Library briefing, 25 May 2021

### Vodafone UK and Three UK website:

- [Building the UK's digital future](#)
- [News and Resources](#)
- [Frequently Asked Questions](#)

Unite the Union, [The Three-Vodafone merger: myths and reality](#) [accessed 14 September 2023]

Unite the Union, [Three UK -Vodafone merger: national security implications](#), July 2023 [PDF, 891KB]

Unite the Union, [Vodafone-Three merger: consumer dossier](#), June 2023 [PDF, 1.2MB]

Balanced Economy Project, [Why the proposed Vodafone-Three merger will harm Britain](#), April 2022 [PDF, 542KB]

Department for Science, Innovation and Technology, [UK Wireless Infrastructure Strategy](#), Policy Paper, 11 April 2023

Cabinet Office; Department for Business, Energy and Industrial Strategy, [MoU between BEIS and the CMA on the operation of the National Security and Investment Act 2021](#), 16 June 2022

Ofcom, [Ofcom's future approach to mobile markets](#), Conclusions to consultation, 6 December 2022.

Ofcom, [Three UK's response to Ofcom's future approach to mobile markets: discussion paper](#), 8 April 2022 [PDF, 2.6MB]

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