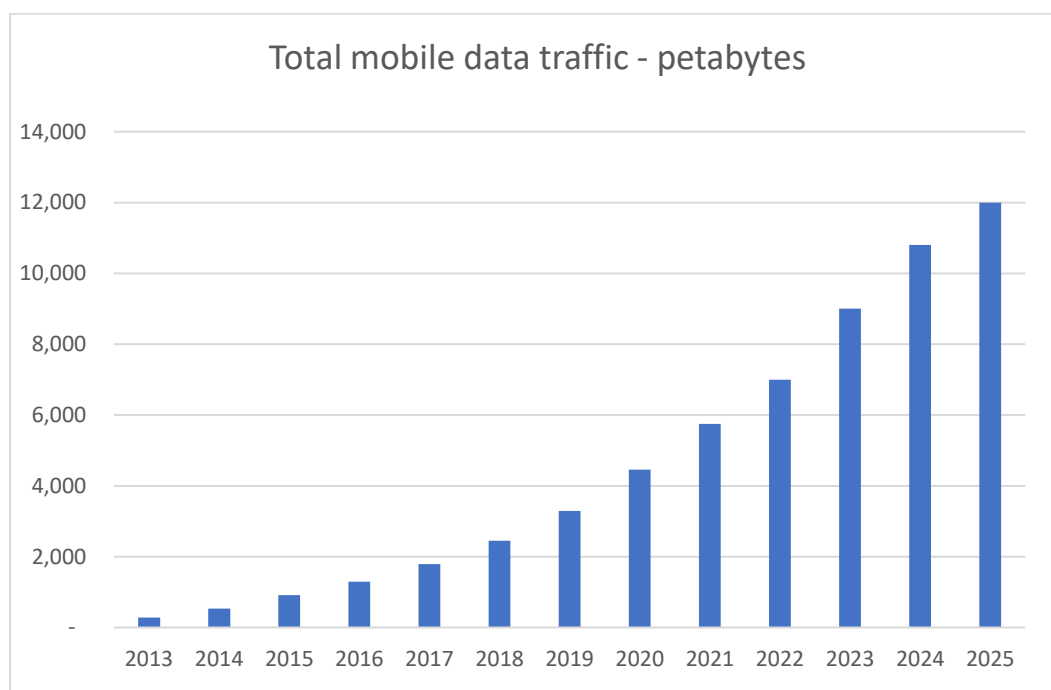


Ofcom discussion document: Connectivity you can count on

Response from Mobile UK

Introduction

1. Mobile UK, whose members are BT/EE, VirginMediaO2 and VodafoneThree, welcomes the opportunity to respond to Ofcom's timely discussion document on the future of mobile connectivity in the UK.
2. In the time since the discussion document was published, Ofcom has released its 2026 Communications Market Report. At the end of 2025, there were 123m mobile connections in the UK, up from 117m in 2024, driven mostly by a 14% growth in 'internet of things' connections (now standing at 31m).
3. Total network traffic also continues to grow. Overall, this represents a **42 times traffic growth** in the 4G/5G era.



4. As further IoT connections and AI driven applications enter the market, network traffic will continue to grow, albeit with much uncertainty over the rate of growth.

5. In the last 12 years, average household monthly spend on telecoms (mobile and fixed) has fallen 24.6% in real terms. Ofcom's overall message is that consumers are 'getting more for less, and customer offerings compare very well internationally in terms of price.
6. While overall customer satisfaction levels remain relatively high, the levels of **dissatisfaction** are much higher in respect of signal strength (11%) versus overall dissatisfaction (4%). There has also been a 5% drop-off (from 2024 to 2025) in satisfaction levels with signal strength in urban areas.
7. This is consistent with Ofcom's observation that mobile operators, despite continuing network investment, are struggling to keep up with increased usage in the busy urban areas.
8. This is not good for customers and not good for the economy, as sub-optimal connectivity will adversely affect productivity and economic activity (e.g. process efficiencies enabled by mobile, mobile payments and mobile e-commerce transactions).
9. Mobile UK agrees with Ofcom's overall assessment that market forces alone will not deliver the mobile connectivity that the UK requires to be a globally competitive economy. We have set out what we believe these interventions should be in our response to the [Mobile Market Review](#).
10. We also agree that Ofcom could encourage customers to adjust the weighting they place on network quality over the weight they place on price, and to provide customers with the necessary information on which to base 'quality' decisions.
11. However, Mobile UK must place a note of caution over how much can be achieved in shaping customer preferences. Mobile UK's view is that market competition is already, to a very large degree, implicitly driven by quality.
12. Those with a long memory will recall that in 1993 Mercury 1-2-1 launched with a 'low price' strategy, with a limited network footprint and quality (an 'all-you-can-eat offering after 6pm' caused significant congestion), whereas Orange launched with a much larger network and strong branding. The former turned out to be a disastrous strategy, from which they never really recovered as a standalone brand.
13. Even though many customers are very price sensitive, it seems to Mobile UK that mobile operators do everything that resources allow to match each other with high-

quality networks. It would be far too risky to do anything else (as the 1-2-1 example clearly showed).

14. Delivering to customers ever-expanding usage and expectations, though, can be extremely challenging. As the Ofcom document sets out, operators are pulled in all directions – outdoors/indoors, urban/rural and road and rail – in their desire to meet those expectations. In some places, the challenge is primarily economic (for example, in rural areas and along railways), although practical issues are also a barrier. In other areas (e.g. urban areas), the challenges are primarily practical (planning permissions, access to sites, urban regeneration leading to loss of rooftops, availability of spectrum, building regulations, wayleaves etc. etc. etc.).
15. Competition in the sector also suffers from a variant of the ‘Model T’ issue (‘you can have any colour you want, providing it’s black’.) In other words, every customer is offered the same network, irrespective of their quality requirements. Mobile UK is thus strongly advocating a reform of the ‘net neutrality’ regulations.
16. This would allow for much greater investment and experimentation in the development of innovative services to meet the quality and packaging needs of differentiated customers. It could represent a significant move away from the ‘one-network-fits-all’ that current policy requires.
17. In summary, Mobile UK supports the greater emphasis on quality, but we are also clear that this approach will only achieve a limited amount. Delivering the transformation that customers expect and that the UK economy requires will require the policy interventions we have proposed in our submission to the [Mobile Market Review](#).

Consultation Questions

The quality of mobile connectivity we want to see

Q1. What are your views on the use of the Map Your Mobile good performance metric and how should the measure evolve over time?

We agree that Ofcom should encourage customers to put greater weight on network quality when deciding which provider to connect to and that Ofcom should provide them with relevant information on which to base their decisions.

It is understandable and practical that ‘coverage’ has been the key metric up to now, as this is relatively easy to understand, and the underlying data relatively easy to deliver via the Coverage Checker, but with network traffic having grown at least 42 times in the 4G/5G era,

and customers' increasing reliance on data and apps, 'good performance' is now a relevant added metric to provide.

With regards to the evolution of the metric over time, the priority is to ensure that the data gives a fair representation of the customer's typical experience and that customers have a good understanding of the information being conveyed. Ofcom will be aware of the complexity of doing this in a mobile context, when so many factors are beyond the operators' control (e.g. temporary movement of the underlying customer base). The crowd sourced data should be complemented by drive testing to qualify the validity of the crowd sourced data.

It should also be a priority to ensure that the data is updated regularly to reflect network investment, spectrum deployment and other improvements to the network. Ofcom should work towards a half-yearly refresh.

Q2. What are your views on the usefulness of: the 90% figure as a benchmark applicable across geographies and based on crowdsourced data?, and whether the 90% benchmark is realistic and sufficiently ambitious?

Ofcom is correct to point out that mobile connectivity is critical to everyday life and underpins the UK's prospects for economic growth and improved productivity.

At paragraph 2.26, Ofcom states *"mobile network performance in many peer OECD countries is consistently stronger than in the UK across a range of key parameters, and there is no clear evidence of UK-specific structural factors that would account for the UK's relative underperformance. This indicates that there is substantial room for improvement."*

There are so many variables at play on how a market plays out over a long period (such as declining real ARPUs, less concentrated population densities, planning challenges, etc. etc.), that identifying specific factors is extremely difficult.

That said, we would agree that there are very few intrinsically adverse factors in the UK (other than population distribution) that are incapable of remedy through policy and a pro-investment regulatory framework.

We also agree that it would be beneficial for the UK's economy to rise up the international league tables – world-class infrastructure is a pre-requisite for a prosperous economy, and this is why Mobile UK has proposed a series of remedies in our response to the Mobile Market Review.

With regards to the 90% benchmark, we are somewhat concerned that it's arbitrary and simplistic, and, absent the policy interventions we are proposing, would not really alter how the market plays out.

However, we agree that encouraging customers/consumers to attach more value to network quality would be beneficial, and that all stakeholders need some consistent and understandable way of measuring progress.

We would instead suggest a framework based on customer use cases, combining crowdsourced data with independently governed field testing. Such a framework, which would be an extension of Ofcom's work already in progress, would better reflect the availability, consistency and resilience that customers value most.

We will keep urging the Government to recognise that mobile connectivity is fundamental to economic and social progress and to deliver policies that support network investment.

Market-led improvements in mobile network quality

Q3. What information do customers need about network quality to choose the best network for their needs, and where are the main gaps in current provision of that information?

Q4. How well does Map Your Mobile currently meet customer and stakeholder needs, and what specific improvements would make it more useful?

As we wrote in our introductory remarks, Mobile UK is strongly advocating for reform of the net neutrality regulations, to drive innovation and to promote the potential for more differentiated customer offerings. More differentiated offerings would benefit investment, benefit customers and benefit the economy.

They would also entail more sophisticated information about network quality being presented. Absent the net neutrality reform, the current information provision is appropriate.

We would also like to see separate performance metrics for all mobile operators, not just the three MNOs. We appreciate that MVNO performance often tracks their host MNO, but often technical or commercial constraints will result in a different customer experience. If consumers are to truly be given the tools to value quality, they need to be able to compare accurately.

Connectivity in busy areas

Q5. What do you think are the biggest barriers to achieving better mobile performance in town and city centres and why? What do you think should be Ofcom's main priorities for our future work in this area?

The biggest barriers in the urban areas are:

- Availability of suitable sites, particularly in London, where host site redevelopment has led to an increase in 'notices to quit'
- Planning permission. Ofcom has done a thorough job in compiling data on variations in refusal rates across the UK. While this is very useful, it does not tell the whole story. In many instances, planning is not refused, but very localised negotiations take place and can result in compromises that ensure a site gets through planning, but can also then impair the quality of the resulting signal.
- Building safety – 2,000 mobile sites are deployed on Higher Risk Buildings, mostly in urban areas. For the last 18 months, operators have been experiencing extreme delays in being able to repair or upgrade such sites, because of the Gateway 2 procedure operated by the Building Safety Regulator. We are hopeful that the recent removal of the Gateway 2 requirement will ease this problem.
- Looking to the future, as network traffic increases, availability of radio spectrum will also become a constraint. As Ofcom is aware, once a mobile site reaches capacity, and there are no further technology improvements or spectrum to deploy, cell splitting (or densification) is the only way to increase capacity in that location. Cell splitting, though, is very expensive, time-consuming and risky (particularly the potential lack of a suitable additional location), and not always commercially viable.

Ofcom main priority

- Ofcom's main priority (and one that it is squarely within its purview) is to make available an adequate pipeline of radio spectrum to meet the timely needs of customer demand. Of particular interest to mobile operators are 200MHz channels in the Upper 6GHz and Lower 7GHz band and the spectrum that will be released as a result of the transition from Digital Terrestrial Television to IPTV in due course.

Q6. What information would stakeholders, especially local authorities / planning authorities find useful for Ofcom to provide further insights on and why?

Mobile UK strongly supports the comments Ofcom has made (at 4.19) that local authorities have a key role in supporting improvements in mobile connectivity. We have long advocated that each should have a **Digital Champion**, whose role is to ensure that the construction of digital infrastructure (within their communities) is given the priority it deserves and that the diverse interests within a local authority pull in the same direction.

We are hopeful that this idea will be revived under the new Prime Minister, following the success of the GMCA (and its Digital Infrastructure Advisory Group) in ensuring that improving digital infrastructure underpins their wider strategy for economic growth and inclusion.

We are also strongly pushing for the National Planning Policy Framework to give due weight to the economic value of new/upgraded mobile infrastructure. We believe the value of mobile

infrastructure, both as individual sites and as part of a nationwide network, is not well understood by many planning officers and authorities.

Mobile UK strongly values the insights that Ofcom have gained from the data on planning permissions and the variability of outcomes this demonstrates.

We would like to urge Ofcom to continue compiling this information. There are a variety of reasons for proposing this approach:

- **Objectivity & Industry Relationships:** If the industry were to collate and publish this data, it risks being perceived as 'naming and shaming' local planning authorities (LPAs), which could harm crucial day-to-day working relationships. Having Ofcom—as an independent body—publish these statistics provides essential credibility and neutrality, avoiding potential friction between LPAs and operators.
- **Leveraging Existing Data:** LPAs already collect and publish planning data on public portals. Rather than the industry creating duplicate reporting burdens, Ofcom is far better positioned to aggregate this existing information.
- **Consistency and Resource Capacity:** MNOs and infrastructure providers all track and structure planning data differently, making internal standardisation a major hurdle. Ofcom has the resources and existing reporting frameworks—similar to the Connected Nations report—to standardise and publish this data regularly to inform the public on deployment progress.

Connectivity in indoor, shared public places

Q7. What do you think are the biggest barriers to achieving better mobile performance indoors and why? What do you think should be Ofcom's main priorities for our future work in this area?

Q8. What information would you find useful for Ofcom to provide further insights on in relation to connectivity indoors and why?

Mobile UK agree with Ofcom's statement (at 5.12) that there is 'no one size fits all approach to improving indoor mobile connectivity'.

The choice of whether an operator pays, a site owner pays, or some combination, will depend on the individual circumstances of the site.

The mobile operators have developed the Joint Operator Technical Specification ([JOTS for Neutral Host indoors](#)), with a view to making it easier and less expensive to install multi-operator cellular connectivity.

The mobile operators have also devised a [Federated Wi-Fi](#) architecture to make Wi-Fi in public spaces more user-friendly (by allowing customer to use their mobile operator ID to authorise and sign them seamlessly into public Wi-Fi.)

Mobile UK does not see any particular role for Ofcom to improve indoor connectivity, although we note your ongoing work on 6GHz, where we have long argued the upper band should be devoted to cellular and apportioned in 200MHz channels. We would also like to see 7125-7250MHz made available to mobile, otherwise, with only 540MHz available at 6GHz, it would not be possible for all three operators to obtain 200 MHz channels, and it could also leave UK operators disadvantaged when compared to their peers within the EU.

Connectivity on trains

Q9. What do you think are the biggest barriers, technical and commercial, to achieving better mobile performance on trains?

Q10. Which are most significant and why?

Q11. Do you agree with our proposal to work with government to support improvements in train connectivity?

Q12. What information would you find useful for Ofcom to provide further insights on in relation to connectivity on trains and why?

Mobile UK is not making a detailed response in this section. We are aware that NISTA and DSIT have commissioned an extensive cost-benefit analysis on the most efficient way of addressing poor connectivity on trains, which we recognise is an ongoing problem.

Ofcom captures well the huge cost and complexity of building contiguous high-capacity connectivity along railway lines. While customers continue to express frustration at the lack of connectivity on trains, they have shown little or no appetite for paying for an improved standalone in-carriage connectivity (e.g. premium Wi-Fi solutions for on-board connectivity), or for paying more for a mobile network service because it offers better connectivity on trains. This means there is no underlying business model to drive improvement.

Before commenting further, though, Mobile UK will await the outputs from the DSIT/NISTA

Connectivity in rural areas

Q13. What do you think are the biggest barriers to achieving better mobile performance in rural locations and why?

Mobile UK strongly agrees with Ofcom's assessment that mobile connectivity is crucial to the sustainability of rural areas in a modern economy, with sectors such as agriculture,

aquaculture and alternative energy generation being increasingly dependent on technology and connectivity to remain competitive and villages desperate to maintain populations and to retain basic services such as shops and schools, in the face of declining populations.

Ofcom is also correct to point out that with only 15% of the UK's population based in rural areas, the economic case for building coverage and capacity is challenging. Operators are building out where they can (in terms of commercial viability and being able to overcome practical challenges such as planning, power and backhaul).

Satellite will play a complementary role, but Mobile UK's estimate is that further infrastructure will be needed on the ground to support the quality of connection that most residual areas will require.

As Ofcom points out (at 7.8), operators try to place masts to provide contiguous coverage between cells, but this is often not possible (it may be viability; it may be planning; it may be lack of a suitable site, it may be topography; there are many potential causes).

Judging by Mobile UK's postbag, and judging by the level of parliamentary questions from rural MPs, many of the complaints come from villages in rural England where cellular coverage is not contiguous at levels of performance expected for current use cases.

Q14. What do you think should be Ofcom's main priorities for our future work in rural locations and what outcomes should we aim to achieve? What solutions (technical, commercial, policy or delivery) could improve rural mobile performance? What information would you find useful for Ofcom to provide further insights on in relation to rural connectivity and why?

Where the terrestrial network needs to be expanded, where there is a public benefit but beyond what is commercially viable, this needs to be directly supported by Government. The Scottish Government has pledged £29m¹ in its current round to address any residual issues, once remaining gaps are identified (i.e. places which are not commercially viable to cover but where mobile connectivity would, nonetheless, have some public economic or social value). Ofcom should support industry by making clear to the UK Government that uncommercial deployments need alternative funding models not further regulatory obligations.

Mobile UK would like to remind Ofcom of the report published by Farr Point in 2024 which evaluated the economic and other uplifts that resulted from [mobile connectivity in non-commercial areas](#).

¹ Ending rural mobile 'notspots' <https://s3-eu-west-2.amazonaws.com/www.snp.org/uploads/2026/04/2026-04-24c-SNP-HIGHLANDS-and-ISLANDS-8pp-2.pdf>

We note that Ofcom is conducting case studies to understand the barriers to improvement in rural areas; we will read the output with interest.

In the meantime, we expect Ofcom to continue working on its mobile mapping project, and to move to a more frequent update cycle so as to give a more timely picture of coverage and capacity in a given location.