

Reference: 02066503

Information Requests  
[information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk)

16 September 2025

## Freedom of Information request: Right to know request

Thank you for your request for information about MBNL on site at specific locations, for which you provided latitude and longitude coordinates. We received this request on 18 August 2025 and we have considered your updated request under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 (the "EIR").

We note this is a follow-up request to case number 02013693, where you asked for the entire August 2021 and May 2023 datasets provided to Ofcom by MBNL (which included site locations as well as other technical information).

### Your request

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*We now seek information solely in relation to sites where we (or our affiliates) are the site providers. These are sites where we already know that EE is in occupation, and in many cases, we are also aware of whether the site supports the Emergency Services Network (ESN) due to upgrade requests received from EE.*

*Please see enclosed a list of the sites which we require this information for i.e. the site which we are the landlords/ landowners of. The relevant site names and coordinates have been provided for ease of reference. If you could kindly input the data for column's E and F that would be greatly appreciated.*

### Our response

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Thank you for your revised request of 18 August 2025.

Taking into account representations from MBNL and advice from Government, we consider the same risks that we identified in our [previous public interest assessments](#) apply in relation to confirmation of whether Ofcom's records show MBNL as present on the specified sites.

As indicated in our previous public interest assessments, any request for similar information relating to a smaller number of MBNL's shareholders' fixed links in block assigned bands is likely to raise similar national security and public safety concerns. It is also likely to raise similar concerns that disclosure would adversely affect MBNL's and/or its shareholders' commercial interests. In particular, the disclosure of information on a smaller set of sites would set a precedent for disclosure in response to requests about other geographic areas, resulting in further aggregation of information. In other words, the same risks apply in relation to the piecemeal disclosure of information.

Taking into account recent requests from APWireless and others for information relating to MBNL's shareholders' fixed links in block assigned bands, we consider the arguments against any further disclosure – including (1) the likelihood and severity of the adverse effect on national security and public safety, and the increased threat to national security and public safety in respect of the requested information when compared to the information already in the public domain; and (2) the likelihood of the adverse economic interest and commercial bargaining position of MBNL and/or its shareholders in relation to its negotiations with landlords and as a result of providing MBNL's and/or its shareholders' strategic information to competitors – carry greater weight than the arguments in favour of disclosure.

As explained in our previous public interest assessments, we are not aware of any wider public interest (separate to APWireless' commercial interests) in Ofcom publishing information on MBNL's shareholders' fixed links in block assigned bands.

Therefore, we consider the public interest in maintaining the exceptions continues to outweigh the public interest in disclosure.

If you have any further queries, then please send them to [information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk) – quoting the reference number above in any future communications.

Yours sincerely,

## Information Requests

### Request an internal review

If you are unhappy with the response you have received to your request for information, or think that your request was refused without a reason valid under the law, you may ask for an internal review. If you do, it will be subject to an independent review within Ofcom. We will either uphold the original decision, or reverse or modify it.

If you would like to ask us to carry out an internal review, you should get in touch within two months of the date of this letter. There is no statutory deadline for us to complete our internal review, and the time it takes will depend on the complexity of the request. But we will try to complete the review within 20 working days (or no more than 40 working days in exceptional cases) and keep you informed of our progress. Please email the Information Requests team ([information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk)) to request an internal review.

### Taking it further

If you are unhappy with the outcome of our internal review, then you have the right to [complain to the Information Commissioner's Office](#).