

Your response

Question

Question 1: Do you have any comments on Ofcom's proposed Work Plan for 2026/27?

Your response

Response by AP Wireless UK

We welcome Ofcom's continued focus on ensuring that the UK has reliable, high-quality communications networks that support growth and consumer outcomes. We particularly support the emphasis on improving mobile connectivity, including enhancements to Map Your Mobile, updates to Connected Nations and preparatory work on Shared Rural Network compliance.

However, we are concerned that the work programme under the priority *Internet and post we can rely on*, and specifically *Promoting seamless, reliable mobile connectivity*, is not yet framed in a way that will identify or address the underlying causes of weak connectivity outcomes. This challenge is no longer confined to traditionally hard-to-reach areas. Increasingly, it affects locations that appear "served" but are in practice fragile, congested, or reliant on temporary or legally uncertain arrangements.

The Plan of Work is therefore strong on consumer-facing ambition, but underdeveloped on the supply-side market dynamics that now play a decisive role in determining whether mobile coverage improves or

stagnates.

Over the past decade, both the policy framework and the structure of the market have changed significantly. Since 2017, the Electronic Communications Code reforms and upcoming implementation of Part 2 of the Product Security and Telecommunications Infrastructure Act have reshaped land valuation and the incentives governing site renewal and deployment. These are policy decisions for government and parliament, but they have had material market consequences, including increased litigation, reduced landowner cooperation and growing uncertainty around site retention and renewal. As the sector regulator, Ofcom is uniquely placed to monitor these impacts and make evidence-based representations to ministers where policy is not delivering the intended outcomes.

During the same period, mobile network operators have divested most of their passive infrastructure to wireless infrastructure providers, often alongside long-term exclusive commercial arrangements but without accompanying coverage or rollout obligations. As a result, the delivery of new macro sites is now heavily concentrated among a small number of infrastructure providers. This structural shift has materially altered how the market functions and how coverage is delivered, yet it is not reflected in the current framing of the

work programme.

Evidence previously shared with Ofcom indicates repeated patterns of behaviour that are directly inconsistent with the Plan of Work's objective of seamless, reliable connectivity. These include operators engaging early with new, independent infrastructure only to disengage once build risk has shifted, leaving operationally ready assets unused while service is maintained through temporary masts, legacy infrastructure or expired agreements. This creates brittle networks, delays upgrades, and generates avoidable coverage risk.

If these outcomes are treated solely as isolated commercial disputes, there is a risk that regulatory effort will focus on symptoms such as improved mapping and consumer information rather than underlying drivers including market concentration, contractual lock-in, refusal behaviours, reduced landowner cooperation, and weak transparency around site churn and disputes.

The Plan of Work already contains several building blocks that could address these issues. We believe the following recommendations and comments should be considered and explicitly developed into a coherent programme of market monitoring and evidence-gathering focused on the passive infrastructure market. The recommendations below set out how this could be achieved:

Recommendations and comments

1. Use Map Your Mobile to capture reliability and resilience

Ofcom's intention to further develop Map Your Mobile provides an opportunity to move beyond availability metrics towards a clearer picture of whether connectivity is genuinely seamless and reliable.

Coverage maps largely show where signal exists, but not whether service is dependent on temporary masts, time-limited planning permissions, legally uncertain arrangements, or capacity-constrained sites. This risks areas appearing "served" even where connectivity is fragile.

We recommend that future development of Map Your Mobile incorporates resilience indicators, including (where practicable) whether service in an area is dependent on temporary infrastructure and whether congestion or capacity constraints are likely to materially affect user experience. Over time, Map Your Mobile could also be used to signpost where persistent coverage gaps correlate with infrastructure deficit, congestion, or recurring site instability, creating a more accurate consumer picture and a stronger evidence base for regulatory action.

2. Expand Connected Nations into a transparency framework for rollout and market health

Ofcom's commitment to update Connected Nations reporting provides

the natural vehicle for introducing the minimum datasets needed to monitor whether the passive infrastructure market is functioning effectively.

At present, neither government nor Ofcom can readily answer basic questions that underpin effective competition and 4/5G rollout: how many sites exist; who owns them; how quickly stock is turning over; how many sites are being lost and replaced; and whether the market is delivering the infrastructure needed for densification and 5G deployment. Connected Nations should evolve into a transparency framework that makes these questions measurable.

We recommend that Ofcom commits during 2026/27 to develop, and where appropriate consult on, a reporting framework covering the following leading indicators:

- **Audit-style site baseline:** a consolidated register of mobile sites, recording site type, owner, deployment status and geolocation, sufficient to establish a reliable baseline for market concentration and rollout monitoring.
- **Site churn and removals:** quarterly reporting of Notices to Quit and site removals (by WIPs and MNOs), with outcomes published in aggregated form, so Ofcom can identify where sites are being lost faster than they are replaced and where coverage risk is emerging.

- **Reliance on temporary or interim infrastructure:** aggregated reporting on temporary masts, emergency planning consents and interim arrangements, so Ofcom can identify where “service continuity” is masking structural failure to deliver durable infrastructure.
- **Expired or disputed agreements:** prevalence of sites operating under expired agreements or subject to unresolved disputes, to identify areas where connectivity is legally and operationally brittle.
- **Litigation and dispute trends:** a database of Code-related tribunal disputes, including duration and outcomes, to quantify the drag on deployment and assess whether the framework is supporting commercial agreement or fuelling systemic conflict.
- **Renewal rates and landowner cooperation:** monitoring of lease renewals accepted, rejected or terminated, published by region and site type, as an early warning indicator of looming infrastructure loss and coverage gaps.

This approach does not require publication of commercially sensitive terms. Aggregated reporting is sufficient to reveal whether the infrastructure base is becoming more resilient or more brittle, and whether

policy changes are improving delivery or worsening market frictions.

3. Create an ‘unused viable infrastructure’ scrutiny mechanism and link it to Ofcom’s delivery priorities

Evidence previously submitted to Ofcom highlights a repeated pattern in which independent providers deliver high-spec, compliant and strategically located infrastructure that remains unoccupied, while operators maintain service through temporary masts, legacy infrastructure or expired agreements.

In several cases, operators engage early in the process, request specifications and signal interest, then disengage once the site is constructed and build risk has shifted to the provider. In other cases, operators continue to operate on legally uncertain arrangements rather than progressing serious commercial discussions, even where planning constraints or coverage gaps make this approach unsustainable. Pricing is not cited as a barrier, and commercial proposals can be left unanswered for extended periods.

This behaviour raises material concerns about market functioning and competition. It is also directly relevant to the Plan of Work’s objective of “seamless, reliable” connectivity, because it creates brittle networks, delays upgrades and undermines resilience.

We recommend that Ofcom establishes an explicit scrutiny mechanism for cases where:

- a site is **built to recognised standards**, operationally ready and available on reasonable terms;
- operators nonetheless **decline to occupy** or defer decisions indefinitely; and
- service is instead maintained through **temporary masts, expired agreements** or other legally uncertain arrangements.

The purpose is not to referee individual negotiations, but to identify repeated patterns across sites and operators that suggest market-wide incentives inconsistent with consumer outcomes, and to determine whether there are discriminatory or exclusionary behaviours preventing new infrastructure from being used.

This should sit alongside Ofcom's partnership activity, but with a clear evidence-gathering and escalation pathway where patterns indicate systemic failure.

4. Use Shared Rural Network compliance work to examine whether interim solutions are substituting for durable deployment

Ofcom's preparatory work to assess compliance with the Shared Rural Network is an important route to ensure public and private investment translates into meaningful

improvements in rural connectivity.

We recommend that Ofcom uses this work not only to assess headline compliance, but also to examine delivery incentives and infrastructure use in practice. Specifically, Ofcom should test whether operators are:

- relying on interim or temporary solutions rather than progressing durable site replacement and upgrade programmes;
- declining to occupy available, technically viable infrastructure even where it would improve resilience; and
- using external litigation risk or commercial arrangements as reasons to defer decisions unrelated to the relevant sites.

This would ensure that compliance assessment captures whether “delivery” is occurring in a way that is consistent with the Plan of Work’s objective of seamless, reliable connectivity, rather than simply meeting a narrow interpretation of coverage commitments.

5. Include wireless infrastructure providers in Competition Supervision programme, and examine long-term exclusivity and structural lock-in

Including wireless infrastructure providers within Ofcom’s Competition Supervision programme would be a significant and welcome step, reflecting the reality that passive

infrastructure ownership and control now sits primarily with WIPs rather than MNOs.

Ofcom should use this programme to examine whether long-term, indexed commercial arrangements between operators and incumbent WIPs are limiting switching, suppressing churn and deterring engagement with new entrants, even where this would improve coverage and resilience. This is particularly relevant where market concentration is high and where independent infrastructure remains vacant despite being operationally ready.

We recommend that Ofcom gathers standardised information needed to assess market power and conduct, including:

- the prevalence and practical effect of exclusivity and preferred supplier provisions;
- upgrade rights and build-to-suit commitments;
- switching barriers and churn rates; and
- whether contractual structures constrain operators' commercial flexibility.

The Competition and Markets Authority has previously noted that churn away from incumbent towercos can be extremely low, which is consistent with a market exhibiting practical lock-in. Ofcom should develop a transparency requirement so these dynamics can be assessed for their effect on market entry, rollout

acceleration and consumer outcomes.

6. Link the mobile connectivity programme to Ofcom's competition toolkit and strengthen the Project Annex wording

The Plan of Work currently reads as though improved outcomes will primarily come from coordination and partnership working. In parts of the market, this will not be sufficient. Where evidence indicates systematic refusal behaviours, structural lock-in, or discriminatory treatment of new entrants, Ofcom should be explicit that it will consider use of its competition and regulatory tools.

Ofcom should therefore strengthen the mobile connectivity entry in the Project Annex to include a commitment along the following lines:

“In parallel with consumer-facing improvements such as Map Your Mobile, Ofcom will strengthen monitoring of the passive infrastructure market, including site churn and removals, reliance on temporary infrastructure, the prevalence of expired or disputed site agreements, and engagement with new infrastructure providers. Where evidence suggests the market is not functioning effectively, Ofcom will consider use of its competition and regulatory tools, including escalation routes where appropriate, to address barriers to rollout and resilience.”

This would make clear that Ofcom will not only measure connectivity

outcomes, but also test the market conditions and behaviours that determine whether those outcomes improve.

Closing

We would welcome further engagement with Ofcom as the work programme develops and would be pleased to share the underlying data, evidence and case studies that sit behind this response. We believe this material would support Ofcom in developing the monitoring framework outlined above and in strengthening the evidence base needed to assess whether the market is delivering the resilient and reliable mobile connectivity that consumers and businesses expect.

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