Your response

Ofcom Plan of Work 2026/27

Cellnex UK Response

January 2026

Cellnex UK Input

Cellnex UK welcomes this opportunity to provide input to Ofcom's plan of work for 2026/27 and looks forward to continuing our collaborative engagement with Ofcom on a number of topics.

Based on our business focus and areas of market participation, as described in Annex 1, we make observations and provide input on two out of Ofcom's four focus areas.

Response Summary

Across the various facets of the mobile regulatory environment - notably performance, resilience planning and future spectrum management, there are clear opportunities to accelerate progress and ensure the UK achieves wider economic, social and environmental benefits. We specifically note:

- Opportunity to improve mobile performance information regarding indoor and rail connectivity by enhancing technical reporting, supporting neutral host solutions and providing clearer plans for improving service quality in challenging locations
- Requirement to strengthen mobile network resilience by setting clearer expectations for backup power and service performance, while exploring how multi-tenancy solutions can improve solution efficiency and deliver better economic outcomes
- Maximise the impact of new spectrum awards by introducing usage or sharing obligations, enabling meaningful deployment in the upper 6 GHz band and supporting small cell rollout through local authority engagement
- Support critical sectors such as utilities & rail by releasing spectrum for smart grid deployment, providing clarity on FRMCS migration, and enabling shared infrastructure and network models so investment in rail systems also improves passenger connectivity

Internet and Post We Can Rely Upon

Improving Mobile Coverage and Performance Reporting

We welcome Ofcom's intention to enhance mobile connectivity, including further development of Map Your Mobile and deeper engagement with government, local authorities, and industry. We continue to believe provision of higher quality and more accurate network performance information would deliver considerable benefits to consumers and UK growth.

- Accurate and transparent network information remains essential for consumers, policymakers, and investors across the wireless value chain. Neutral host providers rely on robust performance and coverage data to design cost-effective shared solutions and to secure multi-operator participation in their deployments.

  We encourage Ofcom to explore how more detailed technical reporting, beyond consumer-facing tools, could support the value chain to make better investment decisions and deliver greater efficient network design. Insights relating to real-world performance, device experience, and the effectiveness of shared infrastructure in challenging areas would be especially valuable.

In addition and in line with the recent government request for regulators to take action to boost economic growth:

- Indoor coverage continues to be an area where consumers face connectivity issues. The current commercial model, in which most location owners are expected to fully fund indoor systems and operator hardware, limits the scale of deployment needed to support nationwide economic growth.

  Ofcom can play an important role by providing greater policy clarity and support for shared indoor systems would materially improve outcomes for businesses, public services, and consumers.

- Rail corridors and stations remain underserved despite connectivity being a priority for passengers, operators, and government. We would welcome more detail on how Ofcom intends to support improvements in rail connectivity, including how it will coordinate with the Department for Transport, Network Rail, and industry participants.

  There is also an opportunity for Ofcom to consider how neutral host models could accelerate deployment on rail routes, reduce costs, and improve consistency across operators. This includes exploring innovative models to leverage synergies from infrastructure investment in Future Railway Mobile Communications System ('FRMCS') and passenger connectivity.

We encourage Ofcom to work with DSIT to explore new approaches to Annual Licence Fees (ALFs) that could enable targeted investment in areas where commercial incentives alone have not delivered improved service. This could support network densification, indoor systems, or transport connectivity to boost UK economic growth.

Telecoms and Digital Infrastructure Security:

Recent events, including prolonged power outages in Europe and the increased focus on national preparedness in the UK, highlight the growing importance of resilient telecoms networks and supporting infrastructure. Ofcom's intention to investigate resilience standards on cellular sites is welcome. Given the dependence of public services, emergency response, and the wider economy on mobile networks, we believe there are several areas where Ofcom's planned work can go further.

- International benchmarks shows countries such as Spain & Switzerland are moving toward multi-hour backup requirements with population-level service obligations during outages, structured incident reporting, and formal coordination mechanisms, reflecting a clear expectation that telecoms remain operational during extended power loss.

  Ofcom should consider quantitative resilience targets to ensure the UK maintains network continuity during blackouts and keeps pace with evolving risk levels.

- Power outages disproportionately impacts some locations. Major roads and rail corridors require connectivity to support public safety and emergency response, while ports and airports are critical to national supply chains and economic continuity. Prioritising resilience at these sites would deliver significant public benefit.

  We encourage Ofcom to prioritise resilience improvements at high-impact locations to support public safety and minimise economic disruption.

- An estimated 40-50% of sites have two or more MNO tenants[1], creating a clear opportunity to use shared and neutral host infrastructure to improve efficiency, reduce duplication and lower whole-life costs.

  Shared, multi-tenant power-backup solutions are the most cost-efficient, scalable and environmentally beneficial way to enhance mobile network resilience, delivering programme efficiencies through single-visit installations, reducing hardware costs by replacing multiple smaller MNO-specific systems with one shared higher-capacity unit, and lowering environmental impact through fewer site visits, reduced truck-rolls and less material use (for example, one cabinet instead of several).

  Ofcom should explore multi-tenant neutral host solutions as a cost-effective approach to delivering resilient, high-quality services

Connected Nations

- Cellnex UK notes Ofcom's intention to include an update on 'planned network deployment data'
- Depending on the type of information and level of detail provided this could, alongside improved mobile network performance information, be highly useful to neutral host providers in optimising their deployment activity and associated investments

  We are interested to learn how Ofcom will include the improved coverage reporting into the report to define performance for coverage and quality

[1] Tenant defined as an MNO deploying its own RAN equipment, with VMO2 and Vodafone in non-urban areas counted as a single tenant as they RAN share from a single set of equipment.

Enabling Wireless in the UK Economy

Ofcom's programme to release additional spectrum, at 1.4 GHz and the upper 6 GHz band, presents a major opportunity to support network densification, innovation and improved connectivity. Realising these benefits, however, depends on ensuring that newly awarded spectrum is actively deployed and supported by the right enabling conditions.

- High-capacity bands such as the upper 6 GHz band have strong potential to support mobile densification and fixed wireless access, as seen internationally. The UK missed the opportunity to include meaningful use-or-lose or use-or-share obligations in the 26 GHz award, which has contributed to the band remaining underused. It is important that this is not repeated in future assignments, including for the 1.4 GHz and upper 6 GHz bands. The European Commission's draft Digital Networks Act[2], which introduces a general "use it or share it" approach to spectrum management, provides a useful reference point for shaping future policy.

  We encourage Ofcom to include minimum deployment or sharing obligations in future spectrum awards to ensure that licence holders either make timely use of the spectrum or make it available to others, thereby maximising its societal and economic value to the UK.

- The upper 6 GHz band will play an important role in supporting densification and new service models. Unlike the mmWave auction, the design of the licensing regime needs to ensure that spectrum translates into physical deployment, not only spectrum holding.

  Ofcom should design the authorisation framework for the upper 6 GHz band in a way that guarantees meaningful deployment with mechanisms that prevent long-term underutilisation.

- Small cells will be essential to unlocking the benefits of higher frequency bands. Local authority asset access and clear public confidence in RF safety remain essential enablers for these deployments.

  Ofcom to continue working with local authorities to improve access to street furniture and to undertake activities e.g. RF monitoring, that demonstrate the safety and value of small cells to support network densification.

Ofcom's planned multi-year review of spectrum below 1 GHz is welcome. These frequencies are essential not only for nationwide mobile coverage but also for sectors such as utilities and rail where reliability, resilience and wide-area coverage are critical. To maximise public value, it will be important that the review gives sufficient weight to non-MNO needs and enables timely preparation for Government-led programmes in these sectors.

- Utilities require dedicated, reliable spectrum to support the smart grid capabilities needed for net zero. Ofcom's last update in November 2023 recognised Government's ongoing assessment, but market uncertainty remains and industry needs clarity so it can commence preparation for network deployment.

  Ofcom should engage government & Ofgem to progress the work needed to enable utility spectrum release, including confirming clearance plans to enable the utility industry to commence deployment of a smart grid network(s).

- Spectrum at 1900 MHz is central to enabling a clear migration path from GSM-R ('Global System for Mobile Communications – Railway') to FRMCS. Cellnex UK is already deploying neutral host infrastructure along the Brighton Mainline and major London stations, and clarity on band allocation and timelines is essential to ensure our infrastructure can support trials, testing and eventual operational rollout.

  We encourage Ofcom to set out clear plans, timescales and technical parameters for the use of 1900 MHz for FRMCS so industry can ensure new rail connectivity infrastructure is future-proof and aligned with national migration plans.

- Leverage the dual benefits of shared rail infrastructure by ensuring FRMCS-ready sites can also deliver high-quality passenger mobile connectivity, including through neutral host models that maximise efficiency and public investment.

  We encourage Ofcom to recognise and support dual-use deployment models in its spectrum planning for rail, ensuring that infrastructure capable of supporting FRMCS is also enabled to deliver enhanced passenger connectivity.

[2] https://ec.europa.eu/newsroom/dae/redirection/document/123753 (Paragraphs 79 & 80)

Annex 1: Overview of Cellnex UK

Cellnex Group

This response is submitted by Cellnex UK (link), part of Cellnex Group (link) which:

- Supports over 420 million mobile connections across Europe
- Operates >110,000 mobile sites today
- Is Europe's leading neutral host mobile infrastructure provider, covering 10 countries: Denmark, France, Italy, Netherlands, Poland, Portugal, Spain, Sweden, Switzerland and the UK
- Provides mobile infrastructure services, private and mission-critical networks, distributed antenna systems and small cells, and smart/IoT and innovative services
- Operates sixteen mission critical networks in Spain for emergency bodies to ensure public safety
- Has deployed forty private networks across Europe for enterprise applications
- Had an annual turnover of €4.3bn in 2024
- Is listed on the main sustainability indices, and evaluated by highly reputable international analysts such as CDP, Sustainalytics, FTSE4Good, MSCI and Standard Ethics

Cellnex UK

We are the trusted partner of all the major UK mobile network operators, hundreds of private businesses, the emergency services, as well as the UK Government, specifically Cellnex UK:

- Is the UK's leading independent wireless connectivity infrastructure company
- Operates >10,000 mobile sites today, which will grow to >14,000 by 2031
- Has deployed over 1,000 small cells to date
- Is an indoor mobile coverage provider, most notably in the Etihad stadium in Manchester and an number of hospitals
- Is deploying contiguous mobile coverage and capacity along the 81km Brighton to London Mainline and three major stations
- Has won three DCMS 5G competitions, working collaboratively with universities and start-ups to deliver 5G innovation
- Is the infrastructure partner delivering the UK's outdoor OpenRAN test environment
- Employs around 300 people across three major UK locations – Reading, Manchester and Leamington Spa • Has invested c.£6bn in the UK since 2016