

Your response

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Introduction	As the Advisory Committee for Northern Ireland (ACNI), our role is to advise Ofcom on communications issues affecting consumers across Northern Ireland. We welcome the discussion paper and support Ofcom's ambition to establish a longer-term strategy focused on improving the quality of mobile connectivity. We recognise that the discussion paper offers an early opportunity to provide general comments and insight, reflect experiences of the stakeholders we represent and help shape considerations aimed at improving mobile connectivity. Consumers increasingly rely on mobile services to access employment, education, healthcare, banking and public services. Future policy should therefore place consumer outcomes at its heart, ensuring that improvements are measured by the quality of the experience consumers receive rather than simply the availability of network infrastructure. Telecommunications policy is reserved to Westminster and any future strategy must be fit-for-purpose for all the nations of the UK. Whilst we welcome the discussion paper, ACNI considers it to be largely GB-focused, with relatively limited consideration of Northern Ireland's unique circumstances. Northern Ireland presents several distinctive characteristics that warrant greater consideration. These include a dispersed rural population, challenging topography, a significant number of market towns, extensive cross-border travel and a smaller commercial market for operators. These characteristics create different deployment challenges and consumer experiences from many parts of Great Britain. ACNI would like to see specific data and evidence from NI to support the thrust of improving connectivity of where people work, live and travel. NI is the smallest of the UK Nations, with distinct characteristics. As highlighted, NI has a large rural population, with terrain that makes “the last mile in the road” a challenge for network

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	providers. Although a challenge, we believe this provides a unique opportunity to develop and test an integrated strategy spanning fixed, mobile and satellite to address those more difficult to reach areas. Specifically, we note the recent advances in direct to device capabilities via satellite technology and note that despite having a landscape that could benefit from such capabilities, there are no such trials or services in NI. In this respect, we advocate for NI to build upon its lead in fibre network deployment and be considered a ‘sandbox’ or ‘proving ground’ for complex last mile deployments for a UK wide integrated strategy. Whilst train travel is not as prevalent as the rest of the UK, network coverage is notoriously poor. In particular, the major train route from Belfast to Dublin has very challenging terrain and is cross border (Republic of Ireland). This, together with the Belfast to Northwest corridor should be included when considering connectivity on trains. Finally, whilst recognising the importance of continued investment by Mobile Network Operators, ACNI believes that there are several key cross-cutting themes that should be considered: • improving how mobile network performance is communicated so consumers can make informed choices; • adopting a sufficiently challenging performance benchmark; and • encouraging greater collaboration and infrastructure sharing where this improves consumer outcomes and reduces unnecessary duplication (and demand on planning).
Section 2: The quality of mobile connectivity we want to see • What are your views on the use of the Map Your Mobile	Confidential? – N ACNI believes the approach to focus on actual connectivity/performance with underlying standards should help address the gap between reported performance (that

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good performance metric and how should the measure evolve over time? 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?	you should get) and lived experience Consumers judge mobile services by whether they work consistently where they live, work and travel, rather than by predicted coverage maps or advertised network capabilities. Developing a robust, evidence-based measure of real-world performance should therefore help narrow the gap between reported network performance and consumers lived experience. Map Your Mobile (MYM) We support the continued development of Map Your Mobile (MYM) as a valuable source of independently collected, crowdsourced data. It provides an important perspective on real-world network performance and has the potential to become an increasingly important measure of consumer experience. However, crowdsourced data should not be viewed in isolation. Participation levels and geographic distribution may influence results, particularly in more rural areas such as Northern Ireland where fewer users may contribute data. ACNI therefore considers MYM should form one component of a wider evidence base alongside operator data, independent testing and other performance metrics. As the platform develops, we encourage Ofcom to consider how MYM can better reflect the complete consumer experience, including service reliability, consistency during journeys, indoor performance and congestion at busy locations. These factors often influence consumer satisfaction as much as headline download speeds. Encouraging increased uptake of the MYM (API / data) with other services, websites, and 3rd parties would ensure it becomes more recognised and trusted by consumers. PERFORMANCE BENCHMARKING ACNI believes it is important to establish a benchmark measure underpinned by data.

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	We believe that a 90% target is not sufficiently ambitious. The discussion paper itself demonstrates that several countries are already achieving performance at, or above, this level, with Estonia approaching 95%. ACNI believe it is appropriate to aim for the highest performing country and hence establish a benchmark target of 95%. Consideration should be given to how the target can be reviewed (and increased) over time in expectation of further technological advances. We also request that when reporting performance against that benchmark, that it is reported separately across all four UK regions, and to ensure that 'averaging' is not used to mask underperforming areas. The aim should be to achieve the benchmark across all areas.
Section 3: Market-led improvements in mobile network quality • 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? • How well does Map Your Mobile currently meet customer and stakeholder needs, and what specific improvements would make it more useful?	Confidential? – N NETWORK PERFORMANCE REPORTING & CUSTOMER NEEDS ACNI believes that empowering consumers with clear, trusted and accessible information is fundamental to improving competition and driving better mobile connectivity. While investment in network infrastructure remains essential, consumers can only exercise effective choice if they understand the differences between providers and have confidence in the information presented to them. ACNI believes that consumers struggle to compare networks – do they understand the information, is it accessible and where does it sit in their purchasing journey? We believe that handset cost, monthly tariff cost, data allowances etc are up front in their decisions, whereas non-price elements like network quality, customer service quality etc are less prominent. In reality consumers struggle to understand coverage vs performance vs reliability. Consumers often assume that signal availability and network performance are synonymous. Helping consumers understand this distinction should form part of Ofcom's wider communications

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	strategy. What information do consumers need? Consumers need information that helps them understand the quality of service they are likely to experience in practice, rather than simply technical network specifications. Consumers should be able to understand: • the expected reliability of mobile coverage; • likely indoor and outdoor performance; • how network performance varies during busy periods; • typical (actual real world) performance – take for example the disparity between EV range promoted by car manufacturers versus real world range experienced by the owner; • how performance compares across providers in a consistent and independent way. From a consumer perspective, reliability and consistency will be key. Consumers generally want confidence that calls will connect, data services will work and connectivity will remain reliable and dependable. ACNI believes there remains a significant gap between the information currently available and what many consumers actually need to make informed decisions. Coverage maps, signal indicators and technical terminology can be difficult for many consumers to interpret. Terms such as <i>Good</i>, <i>Variable</i> or <i>Limited</i> coverage may not consistently reflect consumers' expectations or their actual experience. ACNI considers Map Your Mobile to be an important step towards improving transparency by providing independently collected, crowdsourced information on network performance. However, there remains considerable scope to increase both awareness and usability. We would like to see market awareness of MYM increase through social media and other campaigns to increase uptake. Utilising government platforms could assist in this - such as nidirect.gov.uk and gov.uk

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	We would encourage MYM to be promoted and enabled through authorised APIs, allowing trusted third-party organisations to integrate performance information into their own services. This would also support greater integration with comparison services and consumer advice platforms to improve visibility and encourage greater engagement. ACNI would also question if it would be possible to provide simpler consumer-friendly summaries alongside the 'technical' information on connectivity and coverage. Without oversimplifying performance, Ofcom should consider whether a more intuitive presentation, similar to the Food Standards Agency's well recognised hygiene rating system ('Scores on the Doors'), could improve understanding and support better consumer decision making. Any such approach would need to be underpinned by robust and transparent methodology while remaining simple enough for consumers to interpret quickly. For Northern Ireland, improving consumer information is particularly important given the variation in connectivity experienced between urban areas, market towns and rural communities. Consumers frequently report that their lived experience differs from published coverage information, particularly when travelling along transport corridors or through rural areas where signal quality can change rapidly. ACNI therefore encourages Ofcom to continue refining Map Your Mobile and associated reporting so that it increasingly reflects real-world consumer experience, while ensuring sufficient data is collected across all regions of the UK to provide meaningful comparisons.
Section 4: Connectivity in busy areas What do you think are the biggest barriers to achieving better mobile performance in town and city centres and why?	Confidential? – N NETWORK INFRASTRUCTURE SHARING ACNI recognises that delivering consistently high-quality mobile connectivity within busy towns and city centres presents a different challenge to extending geographic coverage. As demand for mobile data continues to increase, future improvements will depend not only on expanding infrastructure, but on deploying networks more

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• What do you think should be Ofcom's main priorities for our future work in this area? • What information would stakeholders, especially local authorities / planning authorities find useful for Ofcom to provide further insights on and why?	efficiently, improving coordination between stakeholders and making better use of existing assets. Busy urban areas increasingly require mobile connectivity for payments, parking apps, ticketing and wider business and tourist activities. ACNI believes that the mobility strategy should include a policy on sharing of network infrastructure. This is relevant to both urban and rural areas. 5G+ networks drive increased network density, and traditionally Mobile Network Operators (MNOs) have preferred to build, own and operate their own networks, leading to over-population in urban areas, with added pressure on planning processes, the built environment etc. In certain areas, concerns (including myths and misconceptions) over safety issues associated with 5G masts have resulted in arson attacks resulting in loss of service and significant cost to repair. Sharing of mobile infrastructure between MNOs could reduce the visible environment impact limiting those concerns, reduce the planning impact and could lead to reduced costs for MNOs. In a rural environment, mobile network deployment is economically challenging due to the lower subscriber density. Again, shared mobile infrastructure should be considered as a potential strategy to enable the economic rollout of 5G+ services to the more rural communities. The strategy should consider the conditions and the extent to which MNOs should be required to share infrastructure, however one option to be considered is an approach similar to Passive Infrastructure Access (PIA) as applied to the Openreach fixed fibre network. CITIES VERSUS MARKET TOWNS ACNI note the urban study centred on Manchester. Whilst this might be typical of a very large metropolitan city, it should be considered as to how the lessons from Manchester could be applied in NI where there are many traditional 'market towns' e.g. Omagh, Lisburn, Cooks-

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	town. These are small in terms of GB scale but are important centres of population and hence the strategy needs to consider not just urban and rural environments but also those market towns that have both mixed characteristics. STAKEHOLDER ENGAGEMENT We would strongly suggest that the Department for the Economy, Consumer Council for Northern Ireland and relevant representative organisations (e.g. Rural Community Network) are engaged with as part of the strategy development.
Section 5: Connectivity in indoor, shared public places • 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? • What information would you find useful for Ofcom to provide further insights on in relation to connectivity indoors and why?	Confidential? – N NEUTRAL HOSTS TO ENHANCE INDOOR PUBLIC SPACE COVERAGE ACNI note that indoor coverage of 5G+ services can be severely limited due to the limited signal penetration ability and modern building construction. We note and agree that this the largely addressed in private indoor spaces by use of WIFI. For public indoor spaces, we suggest the mobility strategy should address the role that venue owners, landlords and operators of indoor spaces can play as neutral hosts enabling shared infrastructure across all willing MNOs to ensure seamless extension of their 4G and 5G+ services indoors. It is further suggested that consideration is given by building type e.g. Hospitals, Health Centres, Transport Hubs, Shopping Centres etc. ACNI believes there is also an important consumer information challenge. Many consumers remain unaware of the factors affecting indoor mobile performance and may incorrectly assume that poor reception is solely attributable to their mobile provider. Ofcom could support greater public understanding by providing clearer guidance on: • the factors influencing indoor mobile coverage; • the role of building construction in signal attenuation; • when wi-fi calling or other technologies may improve performance;

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	• how indoor coverage differs from outdoor coverage; • what consumers should reasonably expect from modern mobile networks in different environments. Providing this information would help consumers make better-informed decisions and improve confidence in the information provided by operators.
Section 6: Connectivity on trains • What do you think are the biggest barriers, technical and commercial, to achieving better mobile performance on trains? Which are most significant and why? • Do you agree with our proposal to work with government to support improvements in train connectivity? • What information would you find useful for Ofcom to provide further insights on in relation to connectivity on trains and why?	Confidential? – N CONNECTIVITY ON TRAINS/BUSES ACNI note that there is an absence of data on connectivity on board trains (and buses) in NI. Whilst train use is not as extensive in NI as in GB, there are nonetheless very important economic corridors Belfast-Dublin and Belfast-Northwest. Lived experience indicates poor network service on trains (and buses) on these key economic routes. NI needs to be included in the research analysis with evidence-based data showing connectivity across the entire key routes. We also note that the Belfast-Dublin Enterprise train crosses jurisdictions and hence cross border issues also need to be considered in formulation of any strategy. ACNI believes there is insufficient publicly available information regarding actual mobile performance on rail services. Future (public) reporting should include independent measurement of connectivity along rail and bus routes. Given its economic importance the Belfast-Dublin Enterprise train service should be a priority for ongoing monitoring. This should identify persistent coverage gaps and provide a comparison between reported coverage and actual passenger experience. Public information on connectivity levels would help drive confidence and address the current frustration that exists. It should also be noted that Translink is an arms-length government body in Northern Ireland and should be involved in any consultations. There are also important

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	groups such as IMTAC who represent people with specific transport and mobility needs.
Section 7: Connectivity in rural areas • What do you think are the biggest barriers to achieving better mobile performance in rural locations and why? • 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?	Confidential? – N REACHING THE LAST 5% ACNI recognises that improving rural mobile connectivity remains one of the most significant challenges facing the UK's communications infrastructure. Whilst considerable progress has been made in extending coverage, consumers living in rural communities continue to experience poorer connectivity than those in urban areas despite relying on mobile services for many essential aspects of everyday life. ACNI note that NI has a unique characteristic with a significantly higher rural population and difficult terrain rendering it more challenging to achieve network coverage, both fixed fibre and mobile. The last 5% is often the most difficult to connect ACNI suggest that an integrated strategy spanning mobile, fixed and satellite technologies is adopted to address the last 5% hard to reach areas, rather than have separate strategies. This should also consider not just technical but also economic interventions and strategies where necessary and appropriate. In respect of direct to device (D2D) services via satellite technology, we note that despite having suitable Low Earth Orbit (LEO) satellite coverage across the whole of the UK, there are currently limited such offerings in NI. We believe that Ofcom should encourage MNOs to strengthen and promote their D2D offerings, and to develop such solutions beyond providing a minimally functional backup service into a fully-fledged alternative broadband service that could be a credible alternative solution in those difficult to reach not spots. We note that NI is uniquely positioned to 'sandbox' test such integrated strategies and solutions to address those more difficult to reach locations ahead of full UK deployments. This strategy has proved highly successful with

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	fixed fibre deployment and could prove highly effective for an integrated technology strategy. As noted earlier, mobile network infrastructure sharing between MNOs should be considered as a strategy for extending reach into rural communities and lowering the economic barrier. We also reference the prior comments on MYM and accurately communicating the network performance. It is noted that often in rural areas or travelling across rural areas, the lived experience doesn't always match the MYM mappings, hence it is important to review and refine how network performance is communicated.

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