

Your response

Question	Your response
Section 2: The quality of mobile connectivity we want to see - What are your views on the use of the Map Your Mobile 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?	Confidential: No. I support Ofcom's move from predicted coverage towards real-world performance. The proposed thresholds for download, upload and latency are a sensible and easy-to-understand starting point, but they should not become the full definition of a good mobile experience. Over time, I would add a small number of measures that customers actually notice, such as packet loss, jitter, time to first byte, call reliability, session continuity and performance during busy periods. A connection can meet the speed and latency thresholds and still give a poor experience because of instability, congestion or issues elsewhere in the network. How it should evolve: Review the thresholds periodically, informed by consumer research and real application requirements rather than network capability alone. Results should be segmented by peak/off-peak, indoor/outdoor, place type and mobility context, with sample size, age and confidence displayed. Crowdsourced data should be complemented by targeted field testing and should account for places where a connection cannot be made. Otherwise, the hardest not-spots may not appear in the results. The 90% benchmark: Nine successful attempts out of ten is a clear and stretching national reference point, particularly when current nation-level performance is around 70-80%. It is easier to understand than an average speed and focuses on how often the service works well. However, it should not be used as a single national score without more detail underneath it. Ofcom should also show local variation, peak-time performance, the worst-performing areas and places where there is not enough data. Otherwise, strong results in well-measured locations could hide persistent problems elsewhere.

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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: No. What customers need: Customers need clear information about the places, times and activities that matter to them - not only a generic coverage prediction. Comparisons should show reliability for calls, messaging, video calls, streaming and navigation; indoor and outdoor performance; peak-time variation; 4G/5G availability; and the network that each MVNO actually uses. Every result should show when it was measured, the number of observations and an uncertainty indicator. The main gap today is that coverage predictions and broad national averages do not always match a customer's day-to-day experience. It should also be clear whether a result is based on strong evidence, poor evidence or not enough measurements. How Map Your Mobile could improve Map Your Mobile is a good starting point because it brings predicted coverage and measured performance together. The main weakness is that the coverage view can be very local, while the performance result may cover a much wider postal district. Users could easily assume the wider score applies directly to their address. I would improve it by: • Showing sample count, data age and a simple confidence rating. • Making the difference between predicted coverage and measured performance clearer. • Showing when there is not enough data rather than treating the area as understood. • Adding peak and off-peak results. • Allowing users to compare several locations or a regular route. • Giving a clearer way to report "good signal but unusable service" and similar mismatches. The public view should stay simple, with a more detailed evidence view for users who want to understand the numbers.

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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? • 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?	Confidential: No. Biggest barriers: There are three main barriers. First, networks often lack enough capacity at specific hotspots and busy times. A town centre may show strong coverage, or even 5G coverage, but still perform poorly when many people use the same cells. Second, adding capacity is difficult where operators cannot quickly secure suitable sites, landlord or public-asset access, planning consent, power and fibre backhaul. Third, delivery is fragmented: operators, councils, landlords and infrastructure providers each control part of the solution, but no party owns the end-to-end outcome for a failing high street, station or event area. Evidence from Ofcom's own research shows that having 5G coverage does not necessarily mean there is enough capacity or consistent performance, particularly at busy times. Ofcom's priorities: Ofcom should make busy-area performance actionable: • Identify persistent hotspots and their likely cause. • Work with councils and operators on real cases. • Publish before-and-after evidence showing what worked. Information for local authorities: Local authorities need clear maps showing where performance is poor, when it is poor and the likely cause. This could be combined with information on footfall, council buildings, street furniture, power and backhaul. The aim should be to separate problems councils can help unblock from operator investment or network issues that need action from the MNO.

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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: No. Biggest barriers Indoor performance is difficult because modern buildings weaken outside signals and busy venues create high demand in a small area. Outdoor macro sites are often not enough for deep indoor spaces. Delivery is also commercially complicated. Building owners, tenants, operators and neutral-host providers need to agree access, power, safety, design, cost and ongoing maintenance. Their incentives are not always aligned, so projects can stall even where the need is obvious. Ofcom's priorities Ofcom should bring these parties together around a practical framework for large, shared venues. This should cover early consideration of mobile connectivity in new builds and refurbishments, standard survey methods, model procurement and access terms, and principles for multi-operator participation. The guidance should be technology neutral. Depending on the building, the answer may be Wi-Fi, small cells, DAS, a neutral-host system or a mix of solutions. Useful information Venue owners would benefit from simple guidance on which solutions suit different building types, typical lead times, responsibilities and expected costs, including maintenance and future upgrades. Ofcom should also publish anonymised results by venue type and busy and quiet periods, including before-and-after results where improvements have been made.

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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: No. Biggest barriers The main technical problem is achieving continuous coverage and capacity along the whole rail corridor. Carriage penetration loss, tunnels, speed, frequent handovers and high passenger demand all make the problem harder. The main commercial problem is fragmented responsibility. MNOs, train operators, Network Rail and government each control part of the solution, but no single party receives all the benefits or owns the end-to-end outcome. Working with government Yes. This needs a coordinated programme because it crosses telecoms, transport, fibre and power. The programme should set clear passenger outcomes and assign responsibility for delivery. The solution is likely to be a mix of trackside mobile coverage, neutral-host infrastructure, improved onboard Wi-Fi, repeaters and satellite in more remote sections. Useful information Ofcom should publish route and route-segment results by operator, including: • The percentage of the journey with good performance. • No-service periods. • Interruptions. • Sample count. • Peak and off-peak variation. Average speed on its own is not enough. A passenger cares whether a call, stream or work session continues throughout the journey.

Question	Your response
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: No. The biggest challenge is the weak commercial case. Rural sites serve fewer users, while long distances, terrain, power and backhaul make them more expensive to build and maintain. Low-band spectrum helps coverage but may still leave limited capacity, and some communities depend heavily on a single site. Rural areas may also be under-represented in crowdsourced data. Places with no signal or little usage naturally generate fewer measurements, so the scale of the remaining problem can look smaller than it really is. Priorities and outcomes: Ofcom should identify the rural gaps that are unlikely to be resolved by planned operator investment or existing government programmes. This should include targeted testing in areas with little or no data. I would separate two outcomes: • A basic safety and essential communications level everywhere possible. • A higher everyday-use standard in settlements, workplaces, transport routes and visitor destinations. The worst-served communities should improve first. Possible solutions A mix of solutions will be needed: • Neutral-host sites and infrastructure sharing • Targeted spectrum sharing. • Coordinated power and fibre. • Better resilience for critical single-site communities. Direct-to-device satellite can help with basic messaging and emergency reach, but it should be presented as a complement rather than a near-term replacement for mobile service. Useful information Ofcom should publish a rural evidence map that combines: • Measured performance and predicted coverage. • No-service areas. • Sample confidence. • Planned upgrades. It should also show the likely constraint and whether people can expect one or more usable operators.

I respond in a personal capacity, with a professional interest in end-to-end service performance, measurement, and customer outcomes.



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