

Your response

APWireless response to Ofcom's "Connectivity you can count on" discussion paper

APWireless is one of the UK's leading wireless infrastructure site providers, owning and managing a substantial portfolio of sites across the UK and globally on which mobile network operators and wireless infrastructure providers deploy telecoms equipment. APWireless acquires and manages long-term ground leases and rooftop rights, providing the secure site tenure that underpins network investment. AP Wireless is part of Radius Global Infrastructure, a leading international telecommunications and digital infrastructure investment company focused on the acquisition and management of critical network assets, including cell site leases, switching centers, fiber aggregation points, DAS and data centers.

Through its sister company Icon Tower, APWireless has developed and constructed new telecoms mast infrastructure in locations specifically identified as coverage-critical, including areas where Mobile Network Operators (MNOs) have acknowledged network gaps and where local authorities have actively sought improved connectivity.

APWireless therefore occupies a distinctive position in the mobile connectivity ecosystem. We invest in the real estate interests and contractual rights that underpin digital infrastructure assets. That gives us direct, granular commercial experience of the barriers that prevent investment and slow the deployment of necessary infrastructure, barriers that in turn affect the mobile network quality Ofcom's discussion paper is seeking to understand and address.

We welcome the opportunity to respond. Ofcom's ambition to deliver reliable and performant mobile connectivity that people and businesses can count on is one APWireless shares. As Ofcom indicates, the UK's mobile connectivity performance is poor by international standards, with consumers receiving good mobile performance in fewer than eight out of ten attempts. Meeting the 90% benchmark would represent a meaningful step change, and provides a clear rationale for action.

The paper correctly identifies that achieving better mobile connectivity will require action by government, local authorities, landlords, developers and operators. But it frames Ofcom's contribution primarily as one of data publication, stakeholder convening and advisory support to the government on planning reform. APWireless' evidence speaks to three areas in particular.

- First, there is a significant visibility gap: neither government nor Ofcom currently publishes information on how many telecoms sites exist, who owns them, which networks are present, how quickly the stock is turning over, how many sites are being lost and replaced, or whether the market is delivering the infrastructure needed for densification and 5G deployment. Without that data, reliable coverage and performance statistics cannot be built.
- Second, the incentive environment for landowners to host and keep infrastructure is deteriorating, most visibly through rising notices to quit.
- Third, there are specific features of the independent wireless infrastructure market that merit Ofcom's attention under its competition powers. Ofcom has both the mandate and the tools to act on all three.

Put simply, neither Ofcom nor the government can currently answer four basic questions about the UK's telecoms infrastructure base: how many sites exist, and who owns them? How quickly is that

stock turning over? How many sites are being lost each year to notices to quit, and at what rate are they being replaced? And is the market delivering the new infrastructure needed for densification and 5G deployment? Until those questions can be answered, reliable coverage and performance statistics cannot be built on top of an infrastructure base whose scale and stability are unknown.

This response sets out our views on the questions most relevant to the barriers facing infrastructure deployment, investment, the competitive dynamics of the WIP market and the importance of landowner incentives to host and keep mobile infrastructure in their properties, drawing on APWireless' direct experience as an active investor in coverage-critical sites. These are the areas where the evidence we hold is most likely to assist Ofcom in addressing the connectivity gaps the discussion paper identifies. We provide specific case evidence in support of our arguments, much of which has been shared with Ofcom in a separate memorandum submitted in advance of this consultation.

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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 What are your views on the use of the Map Your Mobile good performance metric and how should the measure evolve over time? Key recommendation: The Map Your Mobile metric is a useful benchmark, but Ofcom should commit to regularly publishing data on site numbers, ownership, turnover and notice to quits, since without it the 90% benchmark can't be reliably measured or achieved. APWireless supports the use of a transparent, independently verified performance metric as the basis for assessing network quality. The performance standard of 5 Mbit/s download, 1.5 Mbit/s upload and 50ms latency provides a workable and accessible benchmark that links regulatory ambition to real-world user experience. The 90% benchmark is a meaningful aspiration, and the international comparisons Ofcom cites, placing the UK in the bottom third of OECD countries across multiple measures, underline the scale and urgency of the challenge.

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	We would, however, suggest that the metric and the policy framework around it would benefit from a clearer acknowledgement of something the discussion paper does not adequately address: that performance gaps are not solely the product of operator investment decisions, spectrum allocation or planning friction. A significant proportion of performance shortfalls arise directly from the failure to deploy or keep infrastructure on suitable sites, driven by a deteriorating incentive environment for landowners. The UK's no-scheme valuation framework continues to disincentivise hosting mobile infrastructure. In contrast, the European framework design through the Gigabit Infrastructure Act allows landowners and mobile operators to negotiate deals fairly within market value. The European framework has not eaten away at incentives for landowners, which is reflected in Europe's 5G availability average of 78.7% in comparison to the UK's 57.4%, according to the Open Signal's 2026 study. Until those underlying supply-side barriers are addressed, the 90% benchmark will remain aspirational regardless of what is done on spectrum or planning. As the metric evolves, Ofcom should consider whether it can be disaggregated to identify performance failures that are directly attributable to infrastructure gaps, as distinct from network congestion or technology limitations. This would allow more precise identification of where WIP market intervention or changes to the landowner incentive framework are the appropriate lever, rather than defaulting to planning reform or spectrum policy as the primary tools. Ofcom should commit, as part of the metric's ongoing development, to reporting regularly on the number and status of telecoms masts across the UK, including data on notices to quit, expired leases and vacant infrastructure. There is currently no visibility of these figures. The absence of that data means neither Ofcom nor the government can form an accurate picture of the rate at which the infrastructure base is being renewed, stagnating or contracting. Specifically, there are four things neither Ofcom nor government currently knows: • how many sites exist and who owns them or which networks are on them; • how quickly the stock of sites is turning over;

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	• how many sites are being lost each year through notices to quit, and at what rate they are being replaced; • whether the market is delivering the new infrastructure needed for densification and 5G deployment. This matters not only for infrastructure policy but for the integrity of Ofcom's own statistics: if sites are being lost and replaced by temporary structures at a rate the data does not capture, the Map Your Mobile performance picture may overstate the stability of the underlying infrastructure base. This is a straightforward transparency measure that falls within Ofcom's existing information-gathering powers and which would materially improve the quality of policy debate. A single, transparent 90% figure is useful as a common reference point and, in APWireless' view, is achievable over time - but only if the supply-side barriers set out in this response are addressed alongside spectrum and planning measures.
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 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? Key recommendation: Beyond consumer-facing tools, Ofcom should extend its data transparency commitment to infrastructure-planning data, site ownership, churn, notices to quit, and vacant infrastructure and make it accessible to independent WIPs, not just local authorities. The consumer research published alongside this discussion paper confirms that consumers judge network quality primarily through lived experience rather than technical indicators, and that inertia is a powerful force that blunts the incentive effect of better information. These findings broadly support Ofcom's approach of investing in accessible, location-specific quality data. Customers need simple, activity-based information about whether a network will perform reliably in the places they

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	live, work and travel and APWireless supports Ofcom's direction of travel here. Our evidence points to a related gap that has received less attention. From APWireless' perspective, the information gap is not only in consumer-facing tools but in the data available to support infrastructure planning. The most important missing dataset is one that does not currently exist: a systematic record of telecoms site ownership, site churn, notices to quit, expired agreements and vacant infrastructure. Consistent data collection on site numbers, site churn and infrastructure stability is still needed to endorse the accuracy of Ofcom's coverage estimations. Without this data, Ofcom cannot assess whether infrastructure supply is growing, stable or contracting. Local authorities, landlords, developers and independent WIPs currently lack the granular, site-level status data they would need to identify where new infrastructure would have the greatest impact on connectivity. Ofcom's commitment to publishing more evidence and data to support local authorities is welcome, but this should extend explicitly to independent wireless infrastructure providers, who are often best placed to deliver new infrastructure rapidly where they can identify where it is needed. There is also a specific and underappreciated information gap around notices to quit. As Section 4 explains, notices to quit are the clearest expression of landowner disincentive and a direct cause of coverage gaps. Ofcom should publish data on areas where coverage gaps correlate with notice to quit activity or with sites operating under expired agreements. This would allow independent WIPs and local authorities to direct investment to where it is most needed, and would give Ofcom and government the evidence base to assess the true scale of the infrastructure renewal challenge. Providing that information is precisely the kind of active market facilitation that DSIT's Statement of Strategic Priorities calls for. How well does Map Your Mobile currently meet customer and stakeholder needs, and what specific improvements would make it more useful? The consumer research provides clear directions for improvement that Ofcom should act on: postcode-level

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	analysis can feel too broad, the distinction between coverage and performance is poorly understood, and users want activity-based framing rather than technical percentages. From an infrastructure provider's perspective, APWireless would welcome a version of the tool's underlying data made available in a form that allows stakeholders to understand coverage gaps and supports investment decisions. Making the crowdsourced dataset more accessible to non-operator parties would accelerate market-led improvement and reduce the information asymmetry that currently favours incumbent operators in site-level negotiations.
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 What do you think are the biggest barriers to achieving better mobile performance in town and city centres and why? Key recommendation: planning reform treats a symptom, not the cause; the real barriers are a deteriorating landowner incentive environment (evidenced by rising notice to quit volumes) and MNO resistance to independent infrastructure, so Ofcom should publish notice to quit data, formally assess the Code's impact, and press government to implement section 70 of the PSTI Act. The discussion paper's analysis of barriers to infrastructure deployment in urban areas focuses primarily on planning: the variability of local authority decision-making, the constraints of permitted development rights and the friction of prior approval processes. APWireless agrees that planning creates real costs and delays for network operators and infrastructure providers, and we support engagement with the government's review of the planning framework. Independent WIPs should be included alongside MNOs in any consultation on permitted development rights and prior approval reform. We also agree that the core urban challenge is one of capacity and densification under load rather than basic coverage. Densification requires many more sites, and more upgrades to existing sites, in precisely the dense

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	locations where landowner disincentives and resistance to independent infrastructure bite hardest. A capacity strategy that does not secure the underlying site supply will not deliver. However, planning reform addresses a symptom of infrastructure underdeployment. It does not address the cause. Streamlining planning processes will not, on its own, produce the new sites and renewed infrastructure that the UK's mobile networks need, because the decision of a landowner to make a site available in the first place, and the decision of an operator or independent WIP to invest in it, are prior to and independent of the planning system. A mast that a landowner is unwilling to host, or that an operator will not engage with because it is delivered by an independent WIP rather than an incumbent TowerCo, does not reach the planning system at all. The primary barrier is the deteriorating environment for landowners and the structural resistance to independent infrastructure providers. Both fall within Ofcom's remit. The reason infrastructure deployment has fallen short is not principally that planning authorities are refusing applications. Icon Tower has achieved a 70% planning approval rate over a period of 3 years which was accomplished via a focus on engagement, feedback and quality. Key to their success has been continued focus in the following areas: • Engagement with Digital Champions and key stakeholders to identify problem areas and find the right solution. • Obtaining Local Planning Authority pre-application advice to inform design choices and perfect proposed development schemes before the submission of a planning application. • Striking consensual deals with property owners on fair value distribution models so that property owners have an incentive to actively support the planning application. • Designs that keep with the local environment. • Designs that accommodate multiple operators leading to an increase in the public benefit. APWireless, through its subsidiary Icon Tower, has constructed operationally ready telecoms masts in locations specifically identified as coverage-critical, a significant proportion of which remain unoccupied because operators disengage once the build is complete

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	and investment risk has shifted to the WIP. This pattern, including cases in Bolton, Gloucestershire, Staffordshire and Cumbernauld, has been shared with Ofcom in a separate memorandum. The case with the clearest competition implications is Herbert's Farm, Warwickshire. While that case arises in a county-council area, the same operator behaviour is documented in dense urban settings - including Bolton and Cumbernauld town centre - in the memorandum, and is therefore directly relevant to the urban question posed here. At Batsford House in Gloucestershire, Icon Tower negotiated with a landowner that did not want to deal with the MNOs as a result of their aggressive approach. The landowner worked with Icon Tower instead and entered into a rooftop lease agreement. When the MNO was offered the site by Icon Tower, the MNO issued a legal notice threatening legal proceedings. In the Herbert's Farm, the Warwickshire case, Warwickshire County Council explored the deployment of two neutral host masts with Icon Tower in areas with known coverage deficits. Vodafone/Three and VMO2 stated unequivocally that they would refuse to engage with Icon Tower, and the Council formally withdrew rather than risk planning masts that operators had confirmed they would not use. This is a documented example of MNOs exercising a de facto veto over independent WIPs, and of that veto overriding a local authority's own attempt to improve connectivity for its residents a competition concern, not simply a planning one, and one reinforced by the CMA's finding, in approving Cellnex's acquisition of Three's UK towers, that churn away from incumbent TowerCos runs at as little as 2% annually. The landowner incentive problem The deteriorating incentive environment for landowners and site providers is, in APWireless' experience, the most consequential barrier to infrastructure supply. Where landowners are unwilling to host or renew, sites are simply not available for investment, whatever happens on planning or spectrum. It is also the area where Ofcom's evidence base is currently weakest, and where better data would most improve the policy debate. If landowners are not incentivised to host infrastructure, they will not do so. If the regulatory and legal environment actively undermines the commercial case for hosting, they will take steps to remove masts and withdraw from

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	the market as site providers. This is not a theoretical risk. It is happening now, and it has direct consequences for the availability of the sites that mobile networks need in order to densify and improve performance. As an example, Virgin Media O2 has recently announced that they are losing sites in London at a faster pace than they are being replaced. In the last Cluttons report <i>Connecting Today for Tomorrow</i>, Cornerstone's General Counsel and Director of Property and Estates indicates that in large urban areas experiencing a lot of redevelopment, Cornerstone are losing sites which means they are constantly replacing infrastructure rather than improving or expanding it. The Electronic Communications Code, as reformed by the Digital Economy Act 2017 and further amended by the PSTI Act 2022, was designed to reduce the cost of site access for operators. In practice, it has created a framework in which operators can use the threat of Code rights, and the right to seek renewal on terms set by the First Tier Tribunal at artificially suppressed valuations, as leverage against landowners in commercial negotiations. Sections 61 to 64 of the PSTI Act have further weakened the position of site providers by restricting the ability of landowners to remove apparatus and recover possession of their land. The combined effect is that landowners face an environment in which the commercial return from hosting infrastructure has been substantially compressed, and in which their ability to manage their own property has been curtailed by statutory protections for operators that have no counterpart elsewhere in property law. The consequence is predictable and is already observable in the market. Landowners who might otherwise be willing commercial partners in infrastructure deployment are increasingly reluctant to grant new agreements and are opposing planning applications. Landowners who currently host infrastructure and who perceive the legal framework as weighted against them are exploring removal rather than renewal. The disincentivising nature of the no-scheme valuation framework has encouraged landowners to explore alternative land uses. Once landowners find fairer and hassle-free alternatives, notices to quit are served which results in lost sites. The current valuation framework introduced by the reforms made to the electronic communications code in 2017 must be reconsidered to find an alternative valuation model that incentivises landowners to host mobile infrastructure.

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	The pipeline of new sites is contracting. This is not merely an abstraction: it is the mechanism by which the Code's compression of land values translates directly into reduced infrastructure supply and ultimately into the coverage and performance gaps that Ofcom is seeking to address. Notices to quit as a leading indicator A notice to quit is a materially different signal from ordinary lease renegotiation or dispute: it is not a landowner seeking better terms within a continuing relationship, but a decision to end the relationship altogether. That distinction matters, because notice to quit volumes are the most direct available proxy for the point at which the incentive to host breaks down completely. A notice to quit is a commercial decision: the return from hosting no longer justifies the constraints, legal exposure and loss of control that the current framework imposes. APWireless' research indicates how widespread that conclusion is becoming: 35% of site providers are considering terminating their existing mast agreements, and only 23% say they are very likely to renew when their current agreement expires. The consequences for the network follow directly. Each notice to quit forces the operator to negotiate, relocate or fall back on temporary structures, diverting capital from densification and 5G into replacement activity. A material share of industry capital each year goes simply to replacing sites lost to notices to quit, maintaining current quality at best rather than enhancing it. Yet Ofcom has no systematic visibility of notice to quit volumes, their geographic distribution or their cumulative impact on coverage. Until it does, neither the scale of the landowner incentive problem nor the reliability of the coverage statistics built on the existing site base can properly be assessed. This dynamic is compounded by patterns of operator conduct in Code proceedings that, in APWireless' view, go beyond vigorous enforcement of legal rights and into territory that actively poisons the well for future voluntary engagement. We are aware of a number of cases that illustrate this. A local authority that sought to facilitate the removal of apparatus from a building it wished to demolish, proactively offering the operator alternative sites within its own ownership to minimise disruption, found that the operator responded by serving paragraph 20 notices on the offered sites and then issuing proceedings in respect of them rather than negotiating a

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	mutually acceptable solution. The operator continued to contest the original proceedings, requiring the Council to incur witness and expert costs, before discontinuing shortly before the hearing. The Council is unlikely ever again to offer alternative sites to an operator in a similar situation. That outcome is directly contrary to Ofcom's objective of ensuring that local authorities are willing and constructive partners in infrastructure deployment. In another case, Gravesham Borough Council sought to repair the roof of a residential tower block and reached what it understood to be an agreement with an operator for a temporary lift-and-shift of equipment during the works. Once scaffolding had been erected at a cost of approximately £100,000, the operator declined to proceed with the lift-and-shift. When the Council ultimately secured the right to terminate the operator's agreement, the operator issued Code proceedings to force a new right to remain on the roof. The Council was required to resist this at the First Tier Tribunal and then appeal to the Upper Tribunal, where it ultimately succeeded. The roof repair was delayed for a significant period, causing water ingress into residential flats. The obligations on social landlords arising from Awaab's Law make the consequences of such delays in carrying out essential building maintenance more serious than ever. The case illustrates with particular clarity that the Code, as currently operating, can be used to impose costs and delays on public sector landowners carrying out legitimate and necessary building works, with direct consequences for the residents they serve. A further case involves an agricultural charity that has invested several million pounds in planning a major mixed-use development, including a substantial number of new homes, on land that includes two telecoms sites. One operator contested redevelopment proceedings all the way to within days of the hearing before conceding and agreeing redevelopment-friendly terms. The second operator, despite a precedent agreement now existing with the first, remains in proceedings two months from trial while seeking provisions that would effectively sterilise several hundred acres of the charity's land. The telecoms sites have already cost the charity a very significant sum in legal fees, with no connectivity benefit to show for it. These are not isolated incidents. They reflect a pattern in which the Code's procedural machinery is used to maximise the cost and duration of proceedings for

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	landowners, irrespective of the merits of the underlying position, in the knowledge that many landowners will capitulate rather than sustain the financial and personal burden of litigation. The rational response of landowners who experience or observe this pattern is to decline to enter into new hosting arrangements. Every landowner who reaches that conclusion represents a site that will not be available for network investment. Ofcom cannot treat the aggregate effect of this conduct on infrastructure supply as somebody else's problem. We recognise that the land valuation provisions of the Code are a matter for ministers and parliament, not for Ofcom. But the consequences of those provisions, and of the conduct they enable, for infrastructure investment and network quality fall squarely within Ofcom's statutory responsibilities and within the specific mandate set out in DSIT's Statement of Strategic Priorities. That statement calls for regular reporting from Ofcom on the cost of regulation to industry, the impact of regulation on investment, and whether the regulatory framework could be amended to better support long-term investment and growth. A comprehensive assessment of the impact of the Code on infrastructure supply and landowner willingness to host, informed by Ofcom's information-gathering powers and published with appropriate transparency, would be a significant contribution to the policy debate and would create the evidence base that ministers and parliament need to act. Ofcom should also use its advisory role to the government to make the case for implementing section 70 of the PSTI Act, which provides for a review of the Code with a view to rebalancing the interests of operators and landowners. That review has not been conducted. Its absence is increasingly conspicuous given the scale of the infrastructure challenge Ofcom has itself identified, and given the clear evidence that the current framework is suppressing the voluntary site supply on which network improvement depends. Implementation of section 70 should not, however, be treated as a matter for the government alone. In APWireless' view, the collection of evidence on abusive operator conduct should sit with the National Connectivity Alliance. But collecting evidence is only half of what is needed: that evidence must be acted on. Ofcom should use the enforcement powers available to it, on the basis of the evidence the National Connectivity Alliance should gather, through a graduated response to operators who

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	abuse Code rights against landowners. First, Ofcom should use transparency and name-and-shame tools - publishing, and being willing to name, operators found to engage in repeated abusive conduct in Code dealings. Second, it should make formal findings of abuse where the evidence supports them. And, as an ultimate sanction for operators repeatedly and demonstrably found to have acted abusively, Ofcom should be prepared to act on their Code rights, up to and including suspension or removal. The prospect of losing Code rights is the clearest available deterrent against the pattern of conduct described above; it will only deter if operators believe Ofcom is willing to use it. What do you think should be Ofcom's main priorities for our future work in this area? Ofcom's priorities in this area should reflect the hierarchy of the problems identified above. The most urgent requirement is transparency: without reliable data on infrastructure supply, neither Ofcom nor government can assess whether the market is delivering the sites the 90% benchmark requires. Alongside that, Ofcom should act on landowner incentives and use its existing powers where competition concerns arise. Specifically, we call for the following: • Begin reporting regularly, as part of its Connected Nations work, on the number and status of telecoms sites across the UK, including: how many sites exist and who owns them; notice to quit volumes and their geographic distribution; expired agreements and vacant independent infrastructure; and the number of new independent sites constructed and occupied each year. • Provide a formal assessment, as part of its 2027 update, of the impact of the Electronic Communications Code on infrastructure supply and landowner incentives, and use its advisory role to press the government to implement section 70 of the PSTI Act. Ofcom should also commit to using its enforcement powers on the evidence the National Connectivity Alliance should gather on abusive operator conduct, applying transparency and name-and-shame tools and, as a last resort, acting on the Code rights of operators repeatedly found to have acted abusively.

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	Where the evidence warrants it, examine long-term exclusivity arrangements between operators and incumbent TowerCos alongside the CMA. What information would stakeholders, especially local authorities and planning authorities, find useful for Ofcom to provide further insights on? Local authorities and planning authorities would benefit most from data that connects the coverage and performance gaps within their own boundaries to the sites responsible - including sites under notice to quit or operating on expired agreements - so that they can see where connectivity risk is building before infrastructure is lost, and target their planning and land-access support accordingly. APWireless supports the publication of granular performance data at local level and welcomes the work with Greater Manchester Combined Authority as a model for wider replication. We would suggest that Ofcom's data publication programme should extend beyond local authorities to encompass independent infrastructure providers and site owners. Specifically, we would welcome data that allows site providers and building owners to understand where performance gaps exist at building or street level, what type of infrastructure intervention would be most effective, and how different deployment models compare in terms of impact. This would support more informed commercial decision-making by the private sector actors whose engagement is essential to delivery. We would also welcome Ofcom publishing data on geographic areas where coverage obligations are unmet or where network performance falls materially below the 90% benchmark, in a form accessible to independent WIPs. This would create a direct commercial incentive for new infrastructure investment in the locations that most need it and would reduce the information asymmetry that currently tilts market negotiations in favour of incumbent operators.
Section 5: Connectivity in indoor, shared public places What do you think are the biggest barriers to achieving	Confidential? – No What do you think are the biggest barriers to achieving better mobile performance indoors and why?

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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?	Key recommendation: The same Code-driven commercial asymmetry that discourages landowners outdoors also deters building owners from investing in indoor connectivity, so Ofcom should extend its transparency commitment and Code guidance to the indoor/neutral-host market as well. The discussion paper correctly identifies that dedicated indoor infrastructure is often the most effective solution for large, busy public venues, and the Co-Op Live case study is compelling evidence of what a well-designed distributed antenna system can deliver when building owners, operators and neutral host providers are commercially aligned. The contrast with Three's performance at that venue, absent from the DAS, illustrates precisely why the incentive environment for building owners and independent infrastructure providers matters. The most significant barrier to replicating that outcome at scale is the one the discussion paper does not address: the commercial and legal asymmetry between MNOs and building owners created by the Code. The same Code asymmetry described in Section 4 applies to building access: an operator can in principle invoke Code rights to compel access on suppressed terms, so building owners who might otherwise be proactive commercial partners find themselves in a potentially adversarial relationship before any commercial discussion has begun. The deterrent effect on voluntary investment in building-level connectivity solutions is significant. The evidence from venues where indoor connectivity is genuinely excellent confirms that voluntary collaboration on commercial terms that give the building owner a meaningful stake in the outcome produces far better results than coerced or legislatively mandated access. The building owner who has invested in a venue-wide DAS and receives commercial benefit from it becomes an advocate for connectivity rather than a reluctant host. Policy approaches that further compress the commercial return available to building owners risk undermining precisely the voluntary investment dynamic that Ofcom's indoor connectivity ambitions depend upon. This is the same incentive dynamic that is already suppressing macro site supply in the outdoor market, and there is no reason to expect the indoor market to be immune.

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	What do you think should be Ofcom's main priorities for our future work in this area? Ofcom should convene the multi-stakeholder engagement it promises quickly, with clear terms of reference, and should ensure that independent site providers and neutral host operators are included alongside MNOs and building owners. Ofcom should provide clear guidance on the extent to which Code rights can be invoked in relation to building access for indoor infrastructure, and should address directly the deterrent effect of Code uncertainty on building owner investment decisions. Ofcom should extend the same transparency it applies to the macro infrastructure market to the neutral host and indoor WIP sector, including the terms on which operators engage with independent providers. What information would you find useful for Ofcom to provide further insights on in relation to connectivity indoors and why? APWireless would welcome Ofcom publishing detailed analysis of the performance differential between venues that have invested in dedicated indoor infrastructure and those that have not, across a range of building types and locations. This would provide a powerful evidence base for building owners and developers considering whether to commission connectivity solutions, and would make the case for the regulatory and legal changes needed to make such investment more commercially attractive. We would also welcome analysis of the neutral host market, including the number and scale of operators active in it, the range of commercial models available, and the barriers to market entry and growth.
Section 6: Connectivity on trains • What do you think are the biggest barriers, technical and commercial, to achieving	Confidential? – Y / N

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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?	
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?	What do you think are the biggest barriers to achieving better mobile performance in rural locations and why? Key recommendation: The landowner incentive problem is even more acute in rural areas, where a single notice to quit can remove an entire community's only connection, so Ofcom should apply the same transparency and section 70 recommendations from Section 4 specifically to rural infrastructure. Ofcom's own data demonstrates that, while 5G deployment continues to improve across the UK, rural areas remain significantly behind. In 2025, only 20% of rural sites supported 5G, compared with 48% of urban sites, and just 5% had transitioned to 5G Standalone, compared with 27% in urban areas. These figures demonstrate that, despite continued progress nationally, rural deployment continues to lag significantly behind urban areas. Rural mobile networks depend on private landowners being willing to host infrastructure, yet there is growing evidence that this willingness is declining - as the landowner survey data set out in Section 4 demonstrates. In many rural areas, entire communities rely on a single site for mobile coverage, making this a qualitatively different risk from urban markets and one where the consequences of regulatory inaction are more severe. In these areas, a notice to quit is the sudden and total loss of a community's only connection, with no fallback while a replacement is negotiated, built and commissioned.

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	The landowner incentive problem set out in detail in Section 4 applies with equal force here, with the added risk, particular to rural areas, that the loss of a single willing landowner can remove coverage for an entire community. Planning reform has an important role to play, but it does not address the underlying issue - which, as we have set out in Section 4, is structural. Improving rural connectivity will ultimately depend on maintaining the confidence of the site providers on whom these networks rely. 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? Ofcom's priorities in rural areas should mirror the specific actions we call for in Section 4, applied specifically to the rural context. Specifically, APWireless asks Ofcom to: 1. Apply the transparency and competition actions set out in Section 4 to rural contexts, where operator disengagement from viable independent infrastructure has more severe consequences for communities dependent on a single site. 2. Report regularly on rural-specific infrastructure metrics: the number of new independent masts constructed and occupied in rural areas each year, the number of rural sites under notices to quit or operating under expired agreements, and the number of rural coverage gaps where no operator has an active infrastructure investment plan. There is currently no visibility of these figures. Without it, neither the scale of rural infrastructure nor the adequacy of the regulatory response can be assessed. 3. Use its advisory role to press the government to implement section 70 of the PSTI Act with particular reference to the rural landowner incentive problem. The objective Ofcom should aim to achieve should be a functioning market for rural wireless infrastructure in which independent WIPs can bring forward viable sites, landowners have genuine commercial incentives to host them, and operators engage with available infrastructure rather than defaulting to temporary arrangements or coverage gaps.

Question	Your response
	What solutions (technical, commercial, policy or delivery) could improve rural mobile performance? Improving rural connectivity will require a combination of planning, commercial and regulatory measures. On the policy and regulatory side, alongside planning reform, the government should implement Section 70 of the PSTI Act so that the operation of the Electronic Communications Code can be reviewed against the objective it was intended to achieve: supporting the rollout of digital infrastructure whilst maintaining confidence amongst those who host it. As set out in Section 4, implementing Section 70 would establish whether the current framework is encouraging or discouraging site provision. At the same time, Ofcom should continue to support a competitive infrastructure market in which independent wireless infrastructure providers are able to bring forward viable new sites to improve rural coverage. On the commercial side, revenue-sharing and value-distribution arrangements of the kind Icon Tower already uses - giving landowners a genuine stake in the infrastructure they host - directly restore the incentive to provide and keep rural sites, and should be encouraged rather than displaced by the current Code framework. On the technical side, multi-operator designs materially improve the economics of rural sites where single-operator returns are marginal. Local and devolved authorities also have an important facilitation role. Ofcom's work with the Greater Manchester Combined Authority, cited in Section 4, is directly applicable to rural areas, where combined and unitary authorities can act as catalysts for independent infrastructure deployment in locations that the market has not reached. What information would you find useful for Ofcom to provide further insights on in relation to rural connectivity and why? Ofcom could make a valuable contribution by improving the evidence available on rural infrastructure. Publishing data on mast locations, MNO's operating at the site, services available (3G 4G etc), notices to quit, expired agreements, vacant infrastructure and persistent rural coverage gaps would provide government, local authorities and infrastructure providers with a clearer understanding of where intervention is most needed. Greater transparency would also enable Ofcom to

Question	Your response
	monitor whether the supply of rural sites is expanding or contracting over time, and whether the current regulatory framework is supporting the sustained investment needed to improve rural connectivity. In this sense, and in relation to the above-mentioned problem of built but unused sites of independent WIPs, it is important to note that this problem extends even to Shared Rural Network (SRN) sites, with MP Ann Davies complaining, in a Commons debate on rural mobile connectivity on 12 February 2026, that while the Shared Rural Network had generally worked well in Caerfyrddin, two publicly funded SRN masts in her constituency had been built but were still not operational because of the MNOs' failure to switch them on. During the 18 May 2026 debate on the economy, MP Helen Morgan said that in Shropshire, passive infrastructure masts have planning permission and are ready to go; what cannot be achieved is a mobile phone operator willing to put its equipment on those masts. As APWireless has set out in Sections 3 and 4, this data should be published in a form directly accessible to independent wireless infrastructure providers and site owners. A site provider assessing the case for constructing a new rural mast needs granular, location-specific performance data, Making it available to independent WIPs would reduce the information asymmetry that currently favours incumbent operators in site-level negotiations. Conclusion APWireless welcomes Ofcom's ambition for better mobile connectivity and supports the analytical framework the discussion paper establishes. The finding that no MNO achieved the 90% benchmark in any of the city centres examined, and that the UK ranks in the bottom third of OECD countries on mobile performance measures, underlines the scale of what needs to change. Our core submission is that achieving Ofcom's ambition requires two things. First, transparency: Ofcom should establish the evidence base to know whether site supply is keeping pace with demand, covering how many sites exist and who owns them, how quickly the stock is turning over, how many sites are being lost through notices to quit and replaced, and whether the market is delivering the infrastructure needed for densification and 5G. Without that data, reliable coverage and performance

Question	Your response
	statistics cannot be built. Second, action on landowner incentives: the Code has progressively undermined the commercial case for hosting infrastructure, site supply is contracting as a result, and where the evidence warrants it, including specific competition concerns in the independent infrastructure market, the consequences fall within Ofcom's statutory responsibilities. Neither of these is solely a matter for ministers and parliament. They fall directly within Ofcom's remit and within the specific mandate DSIT has set out. DSIT's Statement of Strategic Priorities directs Ofcom to work with the CMA under concurrent competition powers on issues cutting across sectoral and competition concerns, to monitor 5G investment closely and consider appropriate options if investment is not being achieved at sustainable levels, and to report regularly on the impact of regulation on investment and whether the framework could be amended to better support long-term growth. The evidence APWireless has presented demonstrates that each of these triggers has been met in the infrastructure supply market. Ofcom should act accordingly. Concretely, we ask Ofcom to: 1 Publish the data that is currently absent — how many sites exist and who owns them, notice to quit volumes and geographic impact, the rate at which sites are being lost and replaced, and whether new deployment is sufficient for densification and 5G, including in rural areas where site loss is most consequential. 2 Act on landowner incentives, through a formal assessment of the Code's impact on infrastructure supply and by pressing the government to implement section 70 of the PSTI Act, using its enforcement powers on the evidence gathered, from transparency and name-and-shame through to acting on the Code rights of operators that repeatedly abuse them. 3 Where the evidence warrants it, addressing specific competition concerns in the independent infrastructure market, including long-term exclusivity arrangements with incumbent towercos. APWireless and Icon Tower would welcome the opportunity to share the underlying correspondence and data, and to discuss how existing regulatory tools could

Question	Your response
	be strengthened or applied more effectively to restore market function and accelerate the delivery of connectivity that people and businesses across the UK need and deserve.

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