



Buffering Britain

OFCOM CONSULTATION RESPONSE

Buffering Britain: Response to *Connectivity You Can Count On*



Introduction

Buffering Britain is a non-partisan, independent campaign to improve Britain's mobile signal by getting mobile infrastructure built faster and designed better.

Since we launched this year, we have argued that the official picture of British connectivity given by the regulator is overly optimistic and does not reflect the real experience of mobile users, particularly through its failure to distinguish between coverage and capacity. The gap between the two is a political choice, and we are urging those in power to make a different one. We therefore welcome much of what is set out in *Connectivity You Can Count On*. However, if Britain is to solve its connectivity crisis, Ofcom will need to go further.

Our submission focuses on the questions where Buffering Britain can provide insights that Ofcom may not hear elsewhere.

Response to Section 2: Measuring Connectivity

For too long, poor-quality data has left consumers without the information they need while providing politicians with an excuse for inaction. Ofcom itself notes that the UK ranks 33rd out of 38 OECD members on Opensignal's Excellent Consistent Quality measure.

Buffering Britain welcomes the use of real-world performance data and offers qualified support for the 90% benchmark, at 5 Mbit/s download, 1.5 Mbit/s upload and 50 ms latency, as an achievable baseline level of performance. However, this measure should not become the be-all and end-all of what constitutes satisfactory connectivity, and more granular data is needed.

Targets provide a useful floor. Their binary nature obscures large differences in performance. A connection delivering 5.1 Mbit/s and one delivering 100 Mbit/s both pass, even though they offer meaningfully different levels of usefulness to the end user. Ofcom should therefore publish data for several performance bands above this minimum. The bands should be reviewed regularly as networks develop so that Britain continues moving towards the excellent mobile network a developed country deserves.

Ofcom's proposed performance measure is based on Opensignal's Excellent Consistent Quality measure. Ofcom's version omits jitter, packet loss and time to first byte. A connection with erratic latency, substantial packet loss or slow initial loading could therefore pass Ofcom's test despite having a meaningful negative impact on users.

The international comparison included in *Connectivity You Can Count On* shows that the UK performs poorly against peer countries when networks are assessed using the full six-part measure. Ofcom then proposes a less comprehensive measure for its domestic benchmark. To ensure an accurate representation of real-world performance, the 90% target should use the full measure.

Crowdsourced data also creates a risk of blind spots. Tests can measure a poor connection but will not ordinarily record a result where no usable connection can be established. National results may consequently exclude the worst experiences. Usable phone signal is an important component of public safety. While a buffering video may be annoying, an inability to dial 999 where no network is available can be life-threatening. Any measure adopted by our national regulator should record and

present unsuccessful connection attempts and periods without service, with this data made easily available to the public.

Response to Section 3: Improving Map Your Mobile

Connectivity You Can Count On asks how Ofcom's Map Your Mobile tool can be improved. Alongside the recommendations made in Section 2, Buffering Britain offers several further suggestions.

First, there is an issue with sample size. Performance results are sometimes shown at postcode-area level when there are fewer than 100 samples from an operator. A result may therefore appear hyper-local even when it comes from a much wider area. Ofcom should clearly flag areas without adequate evidence and avoid substituting broader data. A data-quality indicator could show high, medium, low or insufficient evidence.

Second, the map must reflect real-world use. Our campaign has heard from many people who are frustrated that the connectivity data available to them does not reflect their day-to-day lives. Accurate data needs to be collected at several times of day. Performance in the same place can be very different at 6 am and 6 pm, when people are commuting home and networks are congested. Ofcom should request separate peak and off-peak results, or results from the busiest hours of the day, so that people can see worst-case performance in their area instead of an overly optimistic estimate.

Third, to ensure public confidence, Ofcom should publish regular analysis of prediction error by operator and type of geography. It should also explain how the Vodafone-Three merger and subsequent network integration will be represented consistently over time. A better Map Your Mobile incorporating these recommendations would be a powerful tool. It is a prerequisite for educating consumers and showing politicians where mobile network improvements are needed.

Response to Section 4: The Planning System

The analysis of the planning system is welcome and, on its own terms, damning. A system with refusal rates as high as 96% is unsustainable. A large part of the problem is that opposition to masts is concentrated while the benefits are dispersed. People living beside a proposed mast may oppose it on aesthetic grounds, while those living further away who would benefit from improved connectivity may be unaware that a mast has been proposed.

We recognise the barriers set out in *Connectivity You Can Count On*, including protected landscapes, inconsistent planning practice, access to public assets, visual impact, poor evidence and a lack of coordination. The planning system urgently needs to change, with better incentives for communities and political leaders at both local and national levels. Where new masts are needed, better infrastructure design should help to reduce opposition.

Planning decisions should be required to explain the connectivity consequences of refusal. Local authorities should also be encouraged to maintain asset registers and a single point of contact for operators seeking access to public land or buildings.

Data is also an important part of the picture. As mentioned in the previous section, improvements to Map Your Mobile can help build the case for better connectivity. If the available data suggests that

coverage and capacity are adequate, decision-makers may doubt the need for new infrastructure. As a separate accountability measure, Ofcom should publish annual planning outcomes by local authority area, including refusal rates, decision times and reasons for refusal.

Response to Section 6: Trains

The figures on trains are among the starkest presented in *Connectivity You Can Count On*. Good performance in only 17% to 42% of tests demonstrates a system-wide problem. The finding that on-board Wi-Fi met good-performance standards in only 1% of tests is a national disgrace. How can people work on their commute if the connection is so poor?

National averages tell passengers very little about the journeys they make. Ofcom found that performance ranged from 82% on one urban route to 5% on a cross-country route. Performance data should be published by individual route and operator, with separate results for peak and off-peak travel.

There is evidence that investment works. South Western Railway's track-to-train system delivered good performance in 83% of tests between Earlsfield and Basingstoke. Ofcom should work with the Department for Transport, Network Rail, train operators and mobile networks to understand how this was achieved and how it can be repeated elsewhere.

This research should be conducted every year using a consistent methodology. Results should include failed connection attempts and periods without service as well as successful speed tests. Publishing this information would allow passengers to compare routes and operators while showing government and industry where investment is most urgently needed.

The Cost of Doing Nothing

Ofcom cites Vodafone's estimate that improved mobile connectivity could add £6.6 billion a year to the economy after ten years and support the creation of 49,000 businesses. Research published by Buffering Britain also shows the immediate cost imposed on existing mobile users by network congestion.

The Cost of Britain's Buffering, written by Duncan McClements, estimates that peak-hour congestion causes between £150 million and £260 million a year in speed-related consumer welfare losses in London. This estimate uses published time-of-day mobile speed data and applies willingness-to-pay estimates from academic research. The same model suggests a UK-wide cost of between £490 million and £785 million a year, although the national estimate is less certain because comparable time-of-day data is unavailable outside London.

The modelling covers the effect of reduced download speeds. It excludes the cost of increased latency and reduced reliability, along with the effects on business users and approximately one million daily commuters into London. The Vodafone and Buffering Britain figures measure different economic effects, so aggregation would be inappropriate. Together, they demonstrate that poor mobile connectivity restricts business formation while imposing substantial costs on people who already use the network.

The lack of comparable time-of-day data outside London also strengthens the case for the improvements proposed in this response. Ofcom should publish performance data by location and



time of day so that the cost of congestion can be measured more accurately and investment directed towards the areas where additional capacity would have the greatest value.

Conclusion

Ofcom's recognition that coverage figures alone do not describe the experience of mobile users is overdue. The value of *Connectivity You Can Count On* will depend on whether that recognition now leads to better measurement, greater transparency and faster improvements to Britain's mobile infrastructure.

Ofcom should adopt the full six-part performance measure, record unsuccessful connection attempts and publish more detailed information through Map Your Mobile. Consumers need to know how well networks perform in the places and at the times that matter to them.

Better data must lead to better decisions. Local authorities should consider the connectivity consequences of refusing new infrastructure, with Ofcom publishing annual planning outcomes to expose large differences between councils. Train performance should be measured every year and published by route and operator so that investment can be directed towards the worst-affected parts of the network.

Improving Britain's mobile connectivity will require action from Ofcom, government, local authorities, mobile operators and the rail industry. Ofcom can support that work by setting a demanding standard, publishing the evidence and showing where progress has stalled. We would welcome the opportunity to share our modelling and polling as Ofcom prepares its 2027 update and to remain involved in this work.

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