

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? – N The proposed good performance metric appears to be a sensible baseline. However, it should evolve to reflect actual user experience across specific geographic locations rather than broad averages. Consideration should be given to increasing the benchmark beyond 90% at ‘normal’ operating conditions where appropriate, while accounting for exceptional circumstances, seasonal fluctuations and peak demand periods. A minimum level of service for ‘normal’ conditions should be considered for each parish/town/tourist hot spot. The benchmark is useful but risks masking localised issues. Operators may prioritise urban locations where more measurements are generated, leaving smaller towns, high streets and rural communities underserved. Crowdsourced data may also underrepresent areas where users have stopped attempting to use services due to known poor connectivity. The benchmark appears a realistic ambition but Ofcom should consider a minimum performance standards for given areas such as towns, high streets and transport hubs etc.
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 Customers require location-specific information reflecting actual performance where they live, work and travel, rather than broad coverage claims. They should be able to select their common work/home/routes & usage type to make an informed decision on the best network for them. The platform is a useful starting point but should provide more granular location data and better visibility of underserved areas.
Section 4: Connectivity in busy areas	Confidential? – N

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• 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?	Barriers include difficulties securing agreements, concerns over street clutter, limitations of existing infrastructure, risk aversion within local authorities and insufficient deployment resources. These issues are mostly driven by lack of local knowledge, insufficient staff resource in the appropriate teams and perceived risks of taking on a task that isn't considered a day-to-day role of a local authority. This often leads to local councils to engage with 3rd parties who charge a significant fee that can prevent operators from engaging. These 3rd parties also drive LAs to push for maximum returns which are often unpalatable to operators leading to extended negotiation periods. Provide stronger guidance for local authorities to support rooftop and small-cell deployments and encourage aesthetically integrated infrastructure. A nationwide standardised set of acceptable standards for local authority land/buildings/streetlights inc. Guidance on deployment design, site suitability, installation processes, contract management, benefits, risks and case studies. Financial and maybe more importantly impartial technical support that local authorities can access would be extremely beneficial.
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 Lack of clarity over responsibility, weak commercial incentives and no clear business model for indoor connectivity. Going forward internal comms should be a building control/planning consideration as is gas, electricity, water etc. Explore alternative business models and encourage in-building connectivity solutions to be included in the design of public buildings. Can internal connections handover to including a level of advertising / joint ownership between the operators / infrastructure owner. This would also help reduce risk to operator reputations by informing customers that the connectivity isn't solely their responsibility. Case studies, funding models and evidence of economic and social benefits i.e. dwell time, purchases, access to shopping/hospitality services etc.

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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? – N Lack of ownership, commercial incentives and clear funding responsibilities, combined with technical challenges associated with train operations. Government support is likely to be essential because the benefits extend beyond individual commercial stakeholders and are unlikely to make a return for any individual. Is there an opportunity sponsored train connectivity to be batched across certain locations. Is there then an opportunity to have a slightly uplifted ticket providing premium access for business travellers who are likely to be able to recoup their costs whilst providing the greatest economic benefit. Examples of successful funding models, ownership approaches and best practice projects.
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?	Limited commercial/legislative incentives for operators, difficulties securing sites particularly in town centres/residential areas and inadequate consideration of rural AND semi-rural communities. Previously poor data has masked actual performance of networks. The old definitions of rural/urban seem outdated for the modern telecoms environment. Establish local performance standards, focussed improvement for connectivity in rural town centres/high streets. The outcome should be that every town/village has a useable market, high street, business area from a connectivity view point as these are generally centrally located this should provide a good improvement as mobile infrastructure is often located out of towns by larger masts. Solutions could include: Greater incentive for operators to deployment improvements i.e. minimum connectivity standard in all populated areas. Greater guidance on the right technology to deploy in often sensitive locations. Encouragement/guidance of local authority/operator collaboration for mutual benefit inc. how to co-fund within subsidy control rules. Currently there appears to be a market failure to deliver appropriate connectivity.

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	Availability of funding to support infrastructure improvements. Where both mobile and broadband consider building on new mobile infrastructure to provide the broadband backhaul (staging the use-case). Evidence of the economic and social impacts of poor connectivity and examples of successful intervention models i.e. what is the economic/social cost based on population density and/or footfall of poor coverage.

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