

Your response

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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? - N <u>What are your views on the use of the Map Your Mobile good performance metric and how should the measure evolve over time?</u> Consumer Scotland is supportive of the use of a single measure for network connectivity across the UK that allows for comparison between different provider services. This should allow for a single source of information for consumers that they can trust when both looking for data about the performance of their current network provider, and potentially when choosing which network to use in future. We are broadly supportive of the metric that good performance is achieved when consumers can, on average, achieve mobile connectivity that supports everyday apps and services at least nine out of ten times across the UK. This means that the measure is linked to everyday use of mobile connections and closely linked to the consumer experience. As the measure evolves, however, clearer definition of what consumers should expect to be included within the basket of 'everyday apps' and services may be required. Given that the information provided through Map Your Mobile will be central to consumer understanding of the market, it is crucial that the data supporting this tool is as accurate as possible. Map Your Mobile's use of crowdsourced data will more accurately reflect user experiences of mobile connectivity compared solely to network predictions of performance.¹ Crowdsourced data does, however, rely on contributions from users across all regions, and the scale of contributions in different areas may not always be equal.² We note that there is another model for measuring network connectivity in use in the UK, provided by Streetwave. Although Streetwave considers that their model provides more detailed and accurate data than crowdsourced or modelled predictions,³ Consumer Scotland does not take a view about which model is most accurate. It should also be noted that three Scottish Local

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	Authorities have utilised Streetwave data to help understand mobile connectivity in their area.⁴ To enable the measure of connectivity used by Ofcom to be as accurate as possible, ongoing work will be required to ensure data is gathered in line with best practices available, and that work to continually improve the accuracy of the data is ongoing. This could include, for example, triangulating crowdsourced data such as that gathered by Map Your Mobile with data gathered via other techniques (such as Streetwave) which deploy dedicated hardware to targeted areas to measure connectivity. <u>What are your views on the usefulness of the 90% figure as a benchmark applicable across geographies and based on crowdsourced data?</u> <u>What are your views on whether the 90% benchmark is realistic and sufficiently ambitious?</u> We consider that, in the context of current mobile network performance in the UK being 79% average achievement of the good performance metric (76% for Scotland),⁵ a proposed benchmark of 90% represents a significant uplift in performance, if met. For consumers, any significant improvement in connectivity and download speeds could make certain services and activities such as streaming or online shopping via a mobile device more consistently available, while for small businesses who want to utilise digital platforms such as card payment machines, improved connectivity may make this more consistently viable. Ofcom further argues that achievement of this benchmark would bring UK mobile network performance from the bottom third of comparable nations to the top third, which again, suggests a significant improvement more in line with peer OECD countries.⁶ It will be important, however, to continue to measure how the 90% benchmark will perform in comparison to other OECD countries, and review whether the target is still suitably ambitious as other countries work to improve mobile connectivity. Considering whether the 90% benchmark is achievable, we do not offer a technical assessment, but note, as Ofcom does, that a number of comparable nations, who measure their connectivity in a similar way to the UK, are

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	able to achieve 90% good performance.⁷ At a broad UK level, we therefore consider the benchmark to be reasonable. We note, however, that Scotland's unique geography presents specific challenges for both consumers and network providers. Scotland has more remote rural and island areas than the rest of the UK,⁸ and while the proportion of the population living in rural areas in both England and Scotland is comparable (c. 17%),⁹ significantly more people (c. 6%) in Scotland live in 'remote rural' locations,¹⁰ than in England (c. 0.3%).¹¹ Ultimately, this contributes to 4G and 5G connectivity being poorer in Scotland than other areas of the UK given that: • Scotland has the lowest 4G geographical coverage of all four nations of the UK, with 71% of its landmass area having coverage from all providers.¹² • Scotland suffers from the highest incidence of 4G total not-spots (9% of landmass) as compared with a UK average of 4%.¹³ • Scotland has the lowest 5G geographic coverage range of all four UK nations.¹⁴ In this context, it is crucial that the 90% benchmark helps to secure improvements for consumers in all parts of the UK, including remote rural and island areas of Scotland. It will be important that the benchmark does not lead to a widening in consumer experience of mobile performance between different parts of the UK. To that end, we recommend that Ofcom considers augmenting the UK-wide benchmark with sub-UK benchmarks, to ensure performance improves in an equitable way for consumers across the country. This could be enabled, for example, by setting a parallel performance benchmark at, or close to, 90% for each UK nation. Sub-UK targets have been utilised previously in other markets regulated by Ofcom, including, for example, the post-code area delivery targets for first class post. Aside from the implementation of the 90% good performance metric, Consumer Scotland agrees that the provision of comparable performance data across different network providers may help improve consumer choice and informed decision making, incentivise competition

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	and consequently drive improved network quality for consumers.¹⁵
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 <u>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?</u> In line with how the ‘Map Your Mobile’ metric measures the performance of everyday network and app usage, we consider that the most important information consumers need about relative network quality between networks should be focused on how they use online services on mobile devices. This could include local information, per mobile network operator (MNO), on: • The overall frequency with which networks meet the ‘good performance’ metric • Download and upload speeds • Any differences between indoor and outdoor coverage • An ability to track which network provider relates to ‘mobile virtual network operators,’ e.g. giffgaff, Smarty, Lyca mobile. Beyond this, we consider that consumers could benefit from a more comprehensive checklist of different tasks or services they can likely access about the reported performance for their network. This could include, for example, information on how consistently they can: • Make digital calls • Make video calls • Send and receive digital messages • Stream video • Access most apps • Play online games This kind of functional information may provide consumers with the practical information about how they may use their digital devices online on a day-to-day basis and be more helpful to them when making decisions.

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	<u>How well does Map Your Mobile currently meet customer and stakeholder needs, and what specific improvements would make it more useful?</u> Map Your Mobile, as of July 2026, provides consumers with information about the percentage of measurements across postal districts over the last 12 months that can successfully stream video or make a video call if they have coverage. It also allows consumers to compare performance across network providers as well as further detail on the consistency of connectivity in both indoor and outdoor settings in the local area.¹⁶ Most of the information listed above as being important to consumers is provided by the Map Your Mobile tool. It could be improved, however, by more clearly setting out what specific practical tasks and functions consumers can access with different levels of connectivity in local areas. One specific improvement that should be considered is the provision of on download and upload speeds for each network provider. This is provided with the Street-wave tool,¹⁷ but is also a measure that Ofcom have considered important for consumers of mobile network services.¹⁸
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? – N <u>What do you think are the biggest barriers to achieving better mobile performance in town and city centres and why?</u> We note that the data in Ofcom's Connectivity You Can Count On consultation document shows large variation in refusal rates from Local Authorities for planning permission for MNOs to install or upgrade their physical infrastructure. We note that in Glasgow especially, when compared to other UK cities, there are high refusal rates for planning permission for MNOs for both prior approval applications and planning permission applications.¹⁹ While the document acknowledges local contexts may play a role in influencing these decisions, we also consider that Local Authorities do own buildings and assets that can potentially host network infrastructure.²⁰

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	To explore options for how to improve mobile network coverage across the UK, and in Scotland, further work may be required between Ofcom, local authorities and providers to better understand the factors that drive variation in planning refusal rates between local authorities, and to identify any opportunities to address these. Ofcom may consider the development of additional guidance to local authorities to support clear and consistent decision-making on these issues, and support the provision of improved mobile connectivity in each area. Further, when considering their over-arching approach to ensuring consumer interests are reflected in decisions relating to network infrastructure, we would welcome insights from Local Authorities in Scotland on the role of the consumer duty for public bodies in Scotland in informing their decision. <u>What do you think should be Ofcom's main priorities for our future work in this area?</u> From a consumer point of view, Ofcom's priorities should be to continue to develop tools to gather information about the consumer experience of mobile network markets. Utilising this data, they regulator should work to identify specific areas where consumers continue to have limited digital access via mobile devices, and consider how this could be improved, for example, by considering how to incentivise providers to provide increased services in target areas.
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 <u>What do you think are the biggest barriers to achieving better mobile performance indoors and why?</u> While outdoor connectivity is largely determined by the infrastructure of network providers, a wider range of factors determine mobile connectivity for consumers in indoor, shared public spaces. Buildings with thick walls, dense materials or deep internal spaces are likely to largely block mobile signals generated from outside, and in these cases, aspects of internal design or connectivity infrastructure will often mean network connectivity is poor when inside.²¹

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	There are also a range of commercial considerations for different stakeholders involved in indoor network provision, including MNOs, building owners as well as potential third parties utilising the space. These stakeholders may not always share the same commercial incentives to provide indoor connectivity.²² At least one of the stakeholders will usually need to be incentivised to provide consumers using the space with network connectivity, and then to work with their partners to provide it. We recognise the potential conflicting incentives for stakeholders highlighted in the Ofcom consultation document.²³ Building owners may want to provide indoor network infrastructure to help attract potential customers or tenants, while tenants who provide services to consumers may want to provide it for potential consumers of their services. For MNOs, if enough potential consumers use an indoor space, they may be incentivised to help provide indoor connectivity, but while they may be focused on increasing their customer base, building and business owners may want to provide connectivity for consumers of all networks. Where these incentives don't align the provision of indoor network connectivity may not be commercially viable overall. <u>What do you think should be Ofcom's main priorities for our future work in this area?</u> <u>What information would you find useful for Ofcom to provide further insights on in relation to connectivity indoors and why?</u> Given the potentially complex interactions between stakeholders related to mobile connectivity in indoor, shared public spaces, Ofcom's priority in this area should be to strengthen the evidence base on where consumers' need for indoor connectivity in shared spaces is currently unmet. This could be based, in part, on data collected by the Map Your Mobile tool. Ofcom may also explore if there are any opportunities to incentivise MNOs or other stakeholders to help provide network connectivity in indoor and public spaces where existing incentives may not be as clear or aligned. We also note that Ofcom and other stakeholders recognise the potential threats public, unsecure, shared Wi-Fi may cause for consumers when connecting, and that some consumers as a result do not trust connections in

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	these spaces.²⁴ Ofcom could also play a role in gathering data on the security of connections in indoor, shared spaces, and ways in which providers and stakeholders can help improve the security of such public connections.
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 <u>What do you think are the biggest barriers, technical and commercial, to achieving better mobile performance on trains? Which are most significant and why?</u> Providing network connectivity both to and within a moving train presents a number of technical challenges that makes provision of services more complicated and potentially expensive for either MNOs or Train Operating Companies (TOCs) who may wish to provide the service.²⁵ These technical challenges can make the deployment and maintenance costs for the necessary infrastructure expensive for MNOs without any guarantee of return, especially in areas with less busy rail lines. While sharing infrastructure costs with other providers may reduce this cost, it also reduces the return than an individual MNO may generate, limiting their incentive to use shared infrastructure alongside competitors.²⁶ TOCs may be more incentivised to provide network coverage onboard their trains as a way to both attract potential passengers, as well as to support various on-board systems more smoothly. There are, however, high costs for TOCs to provide Wi-Fi onboard their trains, while consumers may not be willing to pay for premium Wi-Fi services.²⁷ This may be, in part, because passengers of the type of journeys where consumers may have more time and opportunity to make greater use of on-board Wi-Fi, such as longer rural or intercity routes, experience materially poorer connectivity than passengers of shorter, urban services.²⁸ With the establishment of Great British Railways as a 'single guiding mind' for railways services in the UK, and in the interest of the consumer principle of access, there may be more opportunity to address the commercial

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	challenges to providing network connectivity as ownership of track and train becomes less fragmented and more strategically aligned.²⁹ <u>Do you agree with our proposal to work with government to support improvements in train connectivity?</u> Yes, Consumer Scotland supports this approach. Ofcom should be able to share or help gather useful data and insights to support government plans regarding on-board connectivity. This should help inform and government strategy and make them more robust. Ofcom's interest in bringing together different stakeholder views to contribute to this work would also be beneficial, and we would suggest that Transport Scotland, Scottish Rail Holdings and Scotrail should be among the stakeholders with specialist knowledge of service provision and infrastructure in Scotland to ensure the Scottish landscape and context are fully considered as part of this work. <u>What information would you find useful for Ofcom to provide further insights on in relation to connectivity on trains and why?</u> The Ofcom report on connectivity on trains provides useful insight into the connectivity of railways lines across the UK, prioritising some of the busiest lines on the network.³⁰ Further regular tracking of connectivity across more lines, in more diverse places, may also be useful to consumers. In particular, further monitoring of key lines in different regions or Local Authorities could help to present a more complete picture of connectivity onboard trains in the UK, and potentially help target more specific lines and areas for improvement. Further, while the lines monitored in the report are major, busy lines in Scotland, we would especially encourage the monitoring of connectivity across more lines in Scotland. While fewer consumers will utilise rail travel on different and more remote lines across different regions, their connectivity needs are equally important, and their experiences should also be monitored.
Section 7: Connectivity in rural areas	<u>What do you think are the biggest barriers to achieving better mobile performance in rural locations and why?</u>

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• 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?	A key issue affecting connectivity in rural areas is the need to install masts providing coverage across less populated and more geographically challenging rural landmasses to provide contiguous service. If insufficient masts are deployed in these areas, coverage will be weaker in some spots.³¹ This challenge is especially relevant to Scotland, where rural landmass is proportionally higher than in the rest of the UK.³² These complications are compounded by a challenging commercial case for providing comparable network strength and quality to more sparsely populated areas as is provided for urban areas, with financial returns likely to be more limited. Where such commercial challenges affect potential provision, however, the consumer principle of fairness becomes relevant. These challenges have been shown, and to some degree addressed, by public interventions such as the Shared Rural Network and Scottish Government's 4G fill in programme.³³ Rural areas in Scotland are also more exposed to a range of climate-related hazards, including extreme weather events such as storms, flooding, and fire-weather conditions³⁴ that can cause significant disruption to different local infrastructures, including those providing telecommunication services. These challenges are likely to be exacerbated as climate change continues to affect the UK and Scotland.³⁵ <u>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?</u> <u>What solutions (technical, commercial, policy or delivery) could improve rural mobile performance?</u> Ofcom's priorities in the context of connectivity in rural areas should be primarily to support the market and public stakeholders to continually monitor and address the barriers to connectivity in rural and island areas. For the benefit of Scottish consumers, this may involve working with Scottish Government and providers to further combat disruption and poor connectivity related to the resilience of infrastructure. For example, Ofcom could engage with Scottish Government's upcoming 2027-2037 Infrastructure Strategy,³⁶ and help convene relevant stakeholders to support parts of that work related to telecommunication infrastructure.

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	More broadly, Consumer Scotland would welcome Ofcom promptly beginning further work it has committed to on reviewing mobile network resilience.³⁷ We are concerned that developing guidance on the power backup capacity for mobile phone cabinets, which at one time was to be for at least 4 hours, but have now been revised down to 3-4 hours,³⁸ do not adequately account for consumer needs and safety in remote rural areas. While recognising the extra cost of providing expanded power reserves, we consider that the cumulative risks to consumers of the 2G and 3G switch off and the move to digital calling may be significant, potentially leaving consumers in rural areas at risk of extended periods where they may not be able to communicate with friends, colleagues or emergency or support services. Ofcom should also continue to gather data on the strength and quality of connectivity in remote rural and island areas in Scotland, identifying areas where further intervention may be required to bring provision of network connectivity to consumers in these areas. This may include ways to incentivise MNOs to improve coverage. <u>What information would you find useful for Ofcom to provide further insights on in relation to rural connectivity and why?</u> We have highlighted 'remote rural' and 'island' broadly as areas in the UK and Scotland are more likely to be affected by poor network connectivity. These regions are also diverse in themselves, ranging from larger towns to smaller villages, with significant variation in local assets and infrastructure.³⁹ Circumstances can differ greatly from community to community, and as a result, it may be worthwhile for Ofcom to analyse and publish data it gathers related to consumer experience in these areas from Map Your Mobile and other tools. This would provide more information to consumers, allow Ofcom to identify specific areas of need, and potentially, allow providers to target these areas if a case can be made, or support offered, for them to do so.

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¹ Ofcom (2026), Ofcom (2026), [Connectivity you can count on](#); see also Connection Technologies (2026), Struggling with mobile signal? Ofcom's 'Map Your Mobile' tool can help you choose the best network, accessible at [Ofcom Map Your Mobile: UK Coverage Checker 2026 \[How to Use\]](#)

² Ofcom (2022), [quality-of-service-methodology-annex.pdf](#)

³ Streetwave, [About Streetwave | Streetwave](#)

⁴ Scottish Futures Trust (2025), [Councils working together to improve mobile phone experience for locals - News - Scottish Futures Trust](#)

⁵ Ofcom (2026), [Connectivity you can count on](#)

⁶ Ofcom (2026), [Connectivity you can count on](#)

⁷ Ofcom (2026), [Connectivity you can count on](#)

⁸ House of Lords Library (2020) [Fact file: Rural economy - House of Lords Library](#); Edmonds, N., Green, L. (2023) Section P6.5 Rural areas in Climate Change in Wales: Health Impact Assessment, Public Health Wales NHS Trust, available at [P6.5-Rural-Communities-Eng-final.pdf](#); European Commission (2023) Factsheet on 2014-2020 Rural Development Programme for Northern Ireland. Brussels: European Commission, June 2023. Available at: https://agriculture.ec.europa.eu/system/files/2023-06/rdp-factsheet-northern-ireland_en.pdf

⁹ House of Commons Library (2024), [Depopulation in rural areas - House of Commons Library](#)

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¹¹ Department for Environment Food & Rural Affairs (2026), Statistical Digest of Rural England [1 Population 14 01 26.pdf](#)

¹² Ofcom (2026) Connected Nations: Spring Update 2026, interactive report, available at [Connected Nations update: Spring 2026](#)

¹³ Ofcom (2025) Connected Nations: UK Report 2025 available at <https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/multi-sector/infrastructure-research/connected-nations-2025/connected-nations-uk-report-2025.pdf?v=407947>

¹⁴ Ofcom (2026) Connected Nations: Spring Update 2026, interactive report, available at [Connected Nations update: Spring 2026](#)

¹⁵ Ofcom (2026), [Connectivity you can count on](#)

¹⁶ Ofcom, [Map Your Mobile](#)

¹⁷ Streetwave, [Mobile Coverage Checker | Streetwave](#)

¹⁸ Ofcom (2025), [Mobile Matters: Download speeds, connection rates and latency levels revealed](#)

¹⁹ Ofcom (2026), [Connectivity you can count on](#)

²⁰ Ofcom (2026), [Connectivity you can count on](#)

²¹ Ofcom (2026), [Connectivity you can count on](#)

²² Ofcom (2026), [Connectivity you can count on](#)

²³ Ofcom (2026), [Connectivity you can count on](#)

²⁴ Ofcom (2026), [Connectivity you can count on](#), see also Ofcom (2025), [Consumer experiences and understanding of mobile network quality](#) and Which? (2026), [How to keep your data safe when using public wi-fi – 8 quick tips - Which?](#)

²⁵ Ofcom (2026), [Connectivity you can count on](#)

²⁶ Ofcom (2026), [Connectivity you can count on](#)

²⁷ Ofcom (2026), [Connectivity you can count on](#)

²⁸ Ofcom (2026) [Connectivity on Trains Measurement Study](#)

²⁹ Department for Transport (2026) [Railways Bill factsheet: introducing and designing Great British Railways - GOV.UK](#)

³⁰ Department for Transport (2026) [Railways Bill factsheet: introducing and designing Great British Railways - GOV.UK](#)

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- ³¹ Ofcom (2026) [Connectivity you can count on](#)
- ³² House of Lords Library (2020) [Fact file: Rural economy - House of Lords Library](#); Edmonds, N., Green, L. (2023) Section P6.5 Rural areas in Climate Change in Wales: Health Impact Assessment, Public Health Wales NHS Trust, available at [P6.5-Rural-Communities-Eng-final.pdf](#); European Commission (2023) Factsheet on 2014-2020 Rural Development Programme for Northern Ireland. Brussels: European Commission, June 2023. Available at: https://agriculture.ec.europa.eu/system/files/2023-06/rdp-factsheet-northern-ireland_en.pdf
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- ³⁴ Scottish Government (2026) [Scottish National Adaptation Plan Annual Report 2025-2026](#)
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- ³⁷ Ofcom (2026) Plan of Work 2026/27 available at [Statement: Ofcom's Plan of Work 2026/27](#)
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