

Your response

Question	Your response
Section 2: The quality of mobile connectivity we want to see	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?	Dorset Council welcomes Ofcom's move away from simply reporting predicted coverage towards measuring real-world performance. Our experience of using independent measurement data demonstrates that residents and businesses are less concerned about whether a signal exists and more concerned about whether services work reliably when needed. The current metric provides a useful baseline, but over time we would encourage Ofcom to consider: - Greater emphasis on reliability and consistency. - Performance along transport corridors and rural routes. - Distinguishing between coverage limitations and capacity limitations. - Greater visibility of indoor performance. - Metrics that better reflect common user activities such as video calling, navigation, digital services and mobile payments. - The metric should continue evolving as consumer expectations and digital services evolve. Dorset Council's own county-wide analysis of independent mobile performance datasets has demonstrated that user experience can vary significantly between settlements, along transport corridors and even within the same postcode area. This reinforces the importance of measuring actual user outcomes rather than relying solely on predicted coverage availability. Our experience also suggests there can be significant differences between predicted coverage information and real-world user experience. Independent performance measurements have identified locations where actual service quality is materially different from that suggested by published coverage predictions. This further reinforces the value of performance-led assessment and independent verification. Dorset Council would encourage Ofcom to publish performance reporting at a range of geographic scales. National or England-level indicators can mask local variation, particularly between densely populated urban areas and large rural authorities such as Dorset. Local authority, constituency or regional reporting would provide a more meaningful understanding of user experience.
What are your views on the usefulness of:	See below responses

Question	Your response
the 90% figure as a benchmark applicable across geographies and based on crowdsourced data?, and	The 90% benchmark provides a clear and understandable national measure that stakeholders can readily understand. However, Dorset Council would caution against relying solely on crowdsourced data when assessing performance across different geographies. The nature of crowdsourced datasets means data density can vary significantly between urban and rural locations. The benchmark should therefore be accompanied by: • Visibility of sample volumes. • Confidence indicators. • Identification of areas where measurement activity is limited. • Supplementary targeted measurement activity in harder-to-reach locations. Dorset Council would support a hybrid approach that combines crowdsourced data with structured, geographically representative measurement and independent verification. Our experience suggests that a grid or hexagon-based methodology, supplemented by crowdsourced evidence where sufficient data exists, would provide a more representative picture of connectivity. Such an approach could help identify locations where limited crowdsourced measurements create evidence gaps and allow targeted measurement activity to focus on those areas. This will help ensure rural communities are represented fairly. Dorset Council explored the use of crowdsourced datasets as part of its early work to understand mobile connectivity across the county. Whilst these datasets can provide valuable insights, they are naturally concentrated in locations where there are larger numbers of active users and devices. In a predominantly rural authority such as Dorset this can result in limited or no recent measurements being available across some communities, rural roads and less frequently visited locations. The absence of data does not necessarily indicate good performance, poor performance or even the availability of service, making interpretation challenging. Dorset Council therefore believes that crowdsourced data should form part of the evidence base rather than being relied upon in isolation. National and local performance reporting should include clear indicators of sample density and confidence levels so that users can understand where conclusions are based on extensive evidence and where evidence remains limited. We would also encourage Ofcom to publish supporting benchmark information for urban, rural and transport environments. National averages can mask persistent local connectivity challenges, particularly within large rural authorities such as Dorset where communities, businesses and visitors depend heavily on mobile connectivity.
Whether the 90% benchmark is realistic and sufficiently ambitious?	We believe 90% is both realistic and ambitious. It provides a meaningful improvement on current performance whilst recognising that achieving 100% reliability across all geographies and operating conditions is unlikely.

Question	Your response
	However, success should not be measured solely through national averages. A key objective should be reducing disparities between urban and rural areas and ensuring improvements are experienced across all communities. Dorset Council is concerned that a nationally aggregated performance measure could be achieved primarily through improvements in higher-footfall locations where the majority of measurements occur. Without complementary geographic measures there is a risk that rural communities experience less improvement whilst overall national performance indicators continue to improve.

Section 3: Market-led improvements in mobile network quality	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?	Consumers need information that reflects real-world usage. Particularly useful information includes: - Reliability where they live. - Reliability where they work. - Performance on regular travel routes. - Indoor performance. - Comparative operator performance. - Information linked to everyday activities. - Expected performance for common user activities such as navigation, digital ticketing, mobile banking, video calls and access to public services. The current gap is that many consumers still see coverage maps rather than performance maps. Coverage predictions do not necessarily equate to a usable real-world experience, and Dorset Council's own analysis has highlighted notable differences between predicted coverage availability and independently measured performance in some locations. Dorset Council's own publicly available postcode-level mobile performance information has demonstrated notable differences between independently measured performance and published coverage predictions. This experience reinforces the importance of making real-world performance information available to consumers when selecting a mobile provider. Consumers increasingly judge network quality based on whether day-to-day digital services function reliably rather than through traditional coverage indicators. Information should therefore be framed around likely user outcomes as well as technical performance measures. Most consumers do not think in terms of signal strength, latency or throughput. They are primarily interested in whether they can complete common tasks such as making video calls, accessing online banking, navigating, purchasing tickets or accessing public services so performance reporting should therefore be linked as far as possible to real-world use cases. Consumers would also benefit from greater transparency around the evidence underpinning published performance figures. This should include information on the source of measurements, sample volumes and confidence levels so that users can better understand how representative the published data is for their area.

• How well does Map Your Mobile currently meet customer and stakeholder needs, and what specific improvements would make it more useful?	Map Your Mobile represents a significant improvement in the information available to consumers. For local authorities, further improvements could include: • GIS downloadable datasets. • Postcode sector level reporting. • Local authority boundary reporting. • Sample density information. • Confidence reporting. • Distinction between "no data" and "poor performance". • Historic trend reporting. These changes would enable local authorities to make better-informed decisions and support infrastructure deployment activity. Local authorities are increasingly expected to support economic growth, digital inclusion and infrastructure planning. Providing local authority-level reporting would help councils better understand local conditions and engage constructively with network operators to address identified issues.
--	--

Section 4: Connectivity in busy areas	Confidential? – No
What do you think are the biggest barriers to achieving better mobile performance in town and city centres and why?	The most significant barriers appear to be: - Site acquisition challenges. - Planning constraints. - Availability of street furniture. - Capacity limitations during peak demand. - Complexity of deploying infrastructure within conservation and heritage areas. In many locations, capacity rather than coverage appears to be the primary issue. In coastal areas such as Dorset, seasonal visitor populations can create demand profiles that differ significantly from permanent population figures. Mobile performance assessments and planning should take account of these seasonal variations in demand. Dorset Council's own observations during major seasonal events in Weymouth have demonstrated that network performance can deteriorate significantly when visitor numbers increase and demand exceeds available capacity. In such circumstances coverage may still be present, but the quality of user experience can degrade substantially. This reinforces the importance of understanding network capacity and congestion, not just coverage availability.
What do you think should be Ofcom's main priorities for our future work in this area?	Ofcom should prioritise: - Better identification of capacity hotspots. - Greater transparency of performance data. - Support for planning reform. - Sharing best practice between local authorities. - Improved evidence demonstrating economic impacts of poor connectivity. Local authorities are more likely to support mobile infrastructure when clear evidence can demonstrate community benefits. Better visibility of whether poor performance is caused by coverage limitations, network congestion or infrastructure deployment challenges would assist local authorities in identifying where planning support and public assets could help facilitate improvements.
What information would stakeholders, especially local authorities / planning authorities find useful for Ofcom to provide further insights on and why?	Local authorities would benefit from: - Open geospatial datasets. - Performance grids by operator. - Capacity and congestion analysis. - Trend information. - Local benchmarking. - Identification of priority intervention locations.

	• Information identifying whether performance issues are primarily driven by coverage constraints or capacity constraints. This would directly support planning, economic development and digital inclusion activity.
--	--

Section 5: Connectivity in indoor, shared public places	Confidential? – No
What do you think are the biggest barriers to achieving better mobile performance indoors and why?	The primary barriers are: - Building construction materials. - Modern energy-efficient designs. - Lack of indoor infrastructure. - Costs of DAS and neutral host deployments. - Unclear ownership of the problem between landlords and operators. Many public buildings were never designed with mobile connectivity in mind. Public sector buildings, transport hubs and community facilities increasingly support digital service delivery, hybrid working and public access to online services. Many of these assets were not originally designed with mobile connectivity requirements in mind.
What do you think should be Ofcom's main priorities for our future work in this area?	Ofcom should focus on: - Raising awareness among landlords and developers. - Developing guidance for building owners. - Promoting neutral host models. - Supporting best practice case studies. - Encouraging mobile connectivity to become a standard design consideration. Mobile connectivity should increasingly be considered alongside fixed connectivity and Wi-Fi requirements within building design, refurbishment programmes and estate management strategies.
What information would you find useful for Ofcom to provide further insights on in relation to connectivity indoors and why?	Useful information would include: - Performance by building type. - Examples of successful deployments. - Costs and benefits of indoor solutions. - Guidance on neutral host and DAS models. - Information relevant to public sector estate managers. - Practical guidance on how public sector organisations can assess and improve indoor mobile performance within their own estates.

Section 6: Connectivity on trains	Confidential? – No
What do you think are the biggest barriers, technical and commercial, to achieving better mobile performance on trains? Which are most significant and why?	The principal barriers are: Technical - Poor coverage along sections of rail corridor. - Signal attenuation from carriage construction. - Frequent handovers between cells. - Capacity constraints during busy periods. Commercial - High deployment costs. - Fragmented responsibilities. - Weak commercial incentives for individual operators. - Long investment payback periods. The lack of a coordinated delivery model is arguably the most significant challenge. Improving rail connectivity requires coordination between train operators, infrastructure owners, government and mobile network operators. In many cases the challenge appears to be as much organisational as technical.
Do you agree with our proposal to work with government to support improvements in train connectivity?	Yes. Reliable mobile connectivity is increasingly considered part of the passenger experience and contributes to productivity, economic growth and customer satisfaction. The complexity of rail infrastructure means that improvements are unlikely to be delivered through market mechanisms alone. Although Dorset has a relatively limited rail network compared with some metropolitan areas, reliable connectivity remains important for residents, businesses and visitors travelling into and out of the county. Expectations of being able to work productively while travelling continue to increase.

• What information would you find useful for Ofcom to provide further insights on in relation to connectivity on trains and why?	Ofcom could provide: • Route-level performance reporting. • Operator comparisons. • Consistent annual benchmarking. • Identification of persistent rail not-spots. • Evidence supporting future intervention priorities. • Information showing performance trends over time so stakeholders can assess whether interventions are delivering measurable improvements.
--	---

Section 7: Connectivity in rural areas	Confidential? – No
What do you think are the biggest barriers to achieving better mobile performance in rural locations and why?	The principal barriers include: - Sparse populations. - Challenging topography. - Difficult commercial business cases. - Infrastructure and power constraints. - Greater distances between sites. There is also a risk that crowdsourced datasets under-represent some rural communities if measurement activity is low. Rural roads and transport corridors are particularly important in Dorset because they support residents, businesses, tourism, agriculture and emergency services. Dorset Council's own experience of analysing mobile performance data suggests that rural settlements and connecting road corridors can experience markedly different levels of service despite appearing similar when represented through higher-level coverage datasets. Granular measurement is therefore particularly important in rural areas.

• 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 should prioritise: • Ensuring rural areas are measured fairly. • Improving transparency around confidence levels. • Identifying persistent not-spots. • Supporting infrastructure sharing. • Encouraging investment and intervention in locations where commercial incentives alone may not be sufficient to deliver improvements. • Improving resilience. • Ensuring rural communities are adequately represented within national performance reporting. • Identifying areas where measurement confidence is low and supporting targeted data collection to improve evidence quality. Ofcom should also consider methodologies that actively identify evidence gaps and prioritise these locations for further measurement activity. This would provide greater confidence that published national and local performance statistics are representative of all users rather than simply reflecting where the greatest volume of measurements occur. Desired outcomes should be: • More reliable connectivity. • Greater geographic consistency. • Improved transport corridor coverage. • Better support for tourism, farming and rural businesses. • Improved confidence in Dorset as a place to live, work, visit and invest. • Reduced digital exclusion. • Greater confidence that published performance information accurately reflects rural user experience.
--	---

• What solutions (technical, commercial, policy or delivery) could improve rural mobile performance?	Potential solutions include: Technical • Infrastructure sharing. • Spectrum sharing. • Neutral host models. • Small cells. • Satellite-supported solutions. Commercial • Shared investment approaches. • Improved access to public sector assets. • Greater use of public sector land, buildings and street furniture where appropriate. In areas where there is limited commercial appetite for deployment, Ofcom and Government should continue to explore alternative delivery models including shared infrastructure and neutral host approaches that can reduce deployment and operating costs whilst improving service availability. Policy • Planning simplification. • Support for rural deployments. • Incentives where market failure persists. • Strengthened collaboration between local authorities, infrastructure providers and national agencies.
--	--

• What information would you find useful for Ofcom to provide further insights on in relation to rural connectivity and why?	From a Dorset Council perspective, the most valuable information would be: • Open GIS-ready performance data. • Local authority-level reporting. • Transport corridor analysis. • Rural-specific benchmarking. • Sample density and confidence information. • Identification of persistent under-served communities. • Operator-level datasets with associated confidence scores and measurement volumes. This would allow local authorities to undertake their own analysis, target interventions, support planning decisions, engage more effectively with network operators and better understand the experience of residents, businesses and visitors. Dorset Council welcomes Ofcom's increased focus on real-world mobile performance. Our experience demonstrates that performance-led evidence can help identify local connectivity challenges more effectively than traditional coverage measures alone. We would welcome continued collaboration with Ofcom and industry partners to ensure local authorities are able to support the delivery of improved mobile connectivity for residents, businesses and visitors. Dorset Council would also be willing to contribute to future place-based measurement and evidence-gathering activities, including comparison of independently collected measurement data with crowdsourced methodologies. We would welcome opportunities to participate in pilot or proof-of-concept activity designed to improve understanding of how different measurement approaches perform in rural and coastal environments.
--	--

Please tell us how you came across this discussion paper.

- ☐ Email from Ofcom
- ☒ Saw it on social media
- ☐ Found it on Ofcom's website
- ☐ Found it on another website
- ☐ Heard about it on TV or radio
- ☐ Read about it in a newspaper or magazine
- ☐ Heard about it at an event
- ☒ Somebody told me or shared it with me
- ☐ Other (please specify)

Please complete this form in full and return to mobileconnectivity@ofcom.org.uk.