

Honest Mobile response to "Connectivity you can count on"

Response to Ofcom's discussion paper on achieving good, reliable mobile performance

About Honest Mobile and why we are responding

Honest Mobile is a UK MVNO founded in 2018. We serve over 100,000 SIM connections and we are growing at 150% a year, built without owning radio infrastructure but with our own in-house BSS/OSS platform, mobile app and network technology.

Our flagship product, Smart SIM, is directly relevant to this discussion paper. Smart SIM is an eSIM that can connect to all four UK mobile networks and to more than 600 networks in over 180 countries. Rather than tying a customer to a single network's coverage and congestion profile, it connects to the best available network wherever the customer happens to be. Our three core customer groups are rural residents, commuters and frequent flyers: precisely the people this paper identifies as being let down by today's single-network reliability.

We are responding because we believe the paper's diagnosis is right, but the solution set is incomplete. The paper focuses almost entirely on supply-side fixes: more sites, more spectrum, better technology, delivered by three MNOs over a period stretching to 2033. Those matter. But there is a demand-side innovation available today that converts the patchy, uneven performance the paper documents into reliable connectivity for consumers: multi-network access, delivered by innovative MVNOs. Ofcom's own evidence throughout this paper makes the case for it, as we set out below.

That innovation depends on wholesale access. A multi-network product only exists if independent providers can buy access to MNO networks on guaranteed, commercially competitive terms. Today there is no such guarantee. We therefore ask Ofcom to treat wholesale access as core to this work programme, not as a separate wholesale-market issue. We say more about what this dependency means for a provider like Honest Mobile in the confidential annex.

Summary of our position

1. The UK mobile market is cheap, but it is not good, and the way value is measured hides that. The paper opens by noting that the price of an average-use basket fell 20% in real terms while data use doubled. On a cost-per-gigabyte basis the UK looks like a success story. But a gigabyte a customer cannot use when they need it has no value at all. Ofcom's own data shows consumers failing to get a good connection more than two times in ten, and the UK ranking 33rd of 38 OECD members. That is a standard Britain should be embarrassed by, and it is invisible in cost-per-gigabyte metrics. Ofcom should reframe how it measures value in this market: cost per usable gigabyte, and consumer frustration measures such as failed connection attempts and connectivity-driven complaints, not headline price per gigabyte. And as the paper itself recognises at paragraph 2.4, a reliable connection is also an

insurance policy whose value is felt even when it is not in use, which price and usage metrics will never capture.

2. Ofcom's reliability framework proves the case for multi-network connectivity. Performance varies sharply between networks, between places and over time. No MNO meets the 90% benchmark anywhere Ofcom measured. A customer who can connect to the best available network at their location gets materially closer to "connectivity you can count on" today, without waiting for eight years of site integration. Ofcom should recognise multi-network access as a legitimate, market-led route to its reliability ambition, and should measure and report it.
3. Multi-network innovation depends on guaranteed wholesale access at commercially competitive rates. There is currently no regulatory backstop preventing an MNO from commercially de-platforming an MVNO by pricing it out, directly or via upstream intermediaries. The VodafoneThree Wholesale Reference Offer, the one formal access remedy in the market, is not functioning as a credible access route; we set out our evidence on its pricing in the confidential annex to this response. If Ofcom wants the market to deliver its connectivity ambition, wholesale access needs to work in practice, not just on paper.
4. MVNO customers must share in the quality improvements this programme tracks. Around a quarter of UK mobile subscriptions are served by MVNOs. If reliability improves for MNO retail customers while MVNO traffic is deprioritised, speed-capped or excluded from new capabilities, the benchmark will be met on paper while a large share of consumers are left behind. Performance measurement, Map Your Mobile and the Network Commitment monitoring should all be capable of detecting a gap between MNO retail and MVNO-hosted experience.
5. Map Your Mobile should be opened up programmatically. The data behind it is some of the most useful consumer information Ofcom holds. It should be available to third parties through an open API, so that comparison sites, providers and innovators can put it in front of consumers at the moment they make decisions rather than only when they visit Ofcom's website.

Section 2: The quality of mobile connectivity we want to see

Views on the Map Your Mobile good performance metric and how it should evolve

We strongly support the shift from predicted coverage to measured, real-world performance. Coverage maps have long overstated the quality of the experience consumers actually receive, and our own customer support data confirms that dissatisfaction is driven by poor performance in nominally covered areas, not by an absence of signal.

We would push Ofcom to go one step further and change how value in this market is framed altogether. The UK regulatory conversation has been dominated for a decade by cost per gigabyte, and on that measure the market performs well: prices down 20% in real terms, data use doubled. But consumers do not buy gigabytes, they buy the ability to do things: pay for parking, board a train with a mobile ticket, take a work call, reach a family member. A gigabyte that is not there when the customer needs it is worth nothing, whatever it cost. The honest unit of value in this market is the usable gigabyte, and the honest measure of failure is frustration: connection attempts that fail and complaints driven by poor connectivity.

On Ofcom's own data, UK consumers fail to get a good connection more than two times in every ten attempts, and the UK sits 33rd out of 38 OECD members on comparable measures. For the world's sixth largest economy that is a national embarrassment, and it has persisted partly because the headline metrics said the market was delivering. Cheap data that does not work is not a consumer win. The countries ahead of the UK got there by building better physical infrastructure: denser networks, consented faster. We return to what that means for planning in our response to section 4. The good performance metric is therefore more than a measurement choice. It is the start of a necessary correction: from measuring what the market sells to measuring what consumers actually receive.

We also want to underline the point the paper makes at paragraph 2.4, because it deserves more weight than a single paragraph: connectivity has an emotional value even when it is not being used. Ofcom's research found that participants placed significant value simply on the reassurance of being able to stay in contact at all times, and that unreliable connectivity produced real anxiety, particularly among older and vulnerable people. In other words, a reliable connection works like an insurance policy. Most of its value is in knowing it is there.

We see this directly with Smart SIM. It sits alongside a customer's existing SIM, and much of the value our customers describe is exactly this reassurance: an independent connection that is there when their main network fails, on a rural road, on a train, or abroad. Some of our happiest customers use it rarely. That is the insurance policy working, and it has a measurement consequence Ofcom should hold onto: usage data alone will always understate the value of reliability, because reassurance leaves no data trail. A connection that fails two times in ten costs the consumer more than the failed attempts. It takes away the peace of mind that is a large part of what they are paying for.

On the metric itself, we suggest three evolutions:

First, the metric should be reported per network and per place, but Ofcom should also publish a best-available-network measure: the share of measurements in an area where at least one MNO meets the good performance standard. This matters because it describes the experience already available to customers of multi-network products such as Smart SIM, and it quantifies the reliability dividend of network diversity. Where individual networks each score 75% to 80% but their failures are uncorrelated, the best-available figure will be substantially higher. That gap is one of the most important numbers in UK mobile policy, because it represents reliability that exists in the market today and is currently locked behind wholesale access terms.

Second, the measurement framework should be able to distinguish MNO retail experience from MVNO-hosted experience on the same network. MVNO traffic can be subject to speed caps, deprioritisation and exclusion from newer capabilities such as 5G standalone. If crowdsourced data is aggregated by host network alone, a growing quality gap between an MNO's own customers and its wholesale customers is invisible. Ofcom should ask its crowdsourcing partners to tag and report this distinction.

Third, we support evolving the thresholds over time, and we would encourage Ofcom to keep peak-time and indoor measurements prominent, as these are where the consumer experience diverges most from headline figures.

Views on the 90% benchmark

The 90% benchmark is sensible, stretching and broadly right. We make two points.

The benchmark is defined per MNO. That is the right way to hold individual operators to account, but it embeds an assumption that the consumer experience is bounded by the performance of a single network. It need not be. Ofcom's own figures show no MNO achieving 90% in any city centre measured, yet a consumer able to use the best available network in each moment would come far closer. We ask Ofcom to complement the per-MNO benchmark with the best-available measure described above, and to state clearly that consumers reaching good, reliable connectivity through multi-network products counts as success for this work programme.

Second, a benchmark met by MNO retail customers but missed by MVNO-hosted customers should not be treated as met. We ask Ofcom to make that explicit.

Section 3: Market-led improvements

What information customers need, and the gaps

Customers need performance information for the places that matter to them, presented per network, including peak-time and indoor performance. Map Your Mobile is a good start and we support its continued development.

The main gaps we see:

- MVNOs are largely invisible in the current information environment. A customer comparing providers cannot easily see which network hosts an MVNO, nor whether the MVNO's customers receive the same performance as the host's own customers. Mandatory plain-English disclosure of any performance or capability differences (speed caps, access tiers, feature gaps) would fix this cheaply.
- Multi-network products do not fit the single-network comparison framework at all. As products like Smart SIM grow, comparison tools should be able to represent "best available network" propositions fairly rather than forcing every provider into a one-network box.
- Peak-time congestion is the biggest driver of the gap between expectation and experience, and it is the least visible in current tools.
- Truthful claims about the underlying network are reserved for the MNOs. A host network's retail brand can advertise that it is the fastest or most reliable in an area. An MVNO selling access to the same network is typically prevented, by its wholesale terms, from saying the same true thing. A consumer comparing an MNO brand against an MVNO on the identical network sees quality claims on one side and silence on the other, and reads the silence as inferiority.

The last of these deserves its own remedy. Ofcom should establish that MVNOs can make truthful, substantiated claims about the networks they use, including naming the host network and citing independent performance data. Wholesale agreements should not be permitted to prohibit truthful advertising. If a network is the fastest in an area, every provider selling access to it should be able to say so. This costs the MNOs nothing except an information advantage they should not hold, and it steers quality competition toward the whole retail market rather than MNO retail brands alone. It also pairs naturally with an open Map Your Mobile API: claims grounded in Ofcom's own measurement data police themselves.

Make Map Your Mobile programmatically available to third parties

The single most effective improvement Ofcom could make to Map Your Mobile is to open it up through a documented, freely licensed API, so that third parties can build on the data programmatically.

The paper notes with satisfaction that Which? and GoCompare now use the same underlying crowdsourced data. That is exactly the right instinct, and it should be systematised rather than left to bilateral arrangements. Consumers do not make mobile decisions on Ofcom's website.

They make them on comparison sites, in provider apps, at the point of sale and increasingly through AI assistants. An open API would let performance information reach consumers wherever those decisions actually happen: a comparison site showing performance for the postcodes a customer actually spends time in, a provider app being honest about where its host network is weak, a switching service recommending the best network for an individual's real movement patterns.

It would also discipline the market in a way a webpage cannot. When performance data is machine-readable, every provider's marketing claims can be checked against it automatically and continuously. Honest Mobile would use such an API from the day it launched, and we would expect dozens of others to do the same. A million visitors to a webpage is a good outcome. The same data embedded in every mobile purchasing decision in the country would be a far bigger one.

On the merger and market-led improvement more broadly

We note the paper's expectation that the VodafoneThree Network Commitment and competitive responses from O2 and EE will drive quality improvement. We agree they will help. But we urge Ofcom to hold two things in view.

The retail market's competitive intensity, which the paper rightly credits for falling real prices, is substantially delivered by MVNOs. That competition now sits on a wholesale market of just three hosts. There is no regulatory backstop preventing a host from foreclosing an MVNO by raising wholesale rates to uneconomic levels, without ever refusing access on the face of it. The same effect can be achieved indirectly through upstream intermediaries such as aggregators and MVNE platforms. As MNO ARPU falls and integration costs bite, the commercial incentive to recover margin from wholesale customers, or to remove awkward innovators from the market entirely, will grow. Some potential suppliers have already told us they cannot work with us because of their contractual arrangements with MNOs.

The one formal access remedy in the market, the VodafoneThree Wholesale Reference Offer, is not functioning as a credible route for an MVNO to build a competitive retail proposition. It is a paper remedy, not a working access regime. We set out our evidence on the WRO's pricing relative to bilateral market rates in the confidential annex to this response.

If market-led improvement is the strategy, the wholesale market is part of the market. We ask Ofcom to:

- establish a clear expectation of guaranteed wholesale access on commercially competitive terms for MVNOs, with Ofcom willing to police the commercial reasonableness of that access whether provided directly or via intermediaries;
- review the WRO's pricing and terms against actual bilateral market rates, and treat a remedy that is never commercially usable as a remedy that has failed;
- monitor wholesale terms for signs that quality improvements funded partly by MVNO demand are being withheld from MVNO customers.

Mobile connectivity is now a basic utility. In other regulated utility sectors, access on commercially reasonable terms is guaranteed. In mobile it is not, and everything this paper hopes the market will deliver for consumers rests on that missing guarantee.

Section 4: Connectivity in busy areas

Biggest barriers

The biggest barrier is that the UK has made it too slow, too uncertain and too expensive to build the physical infrastructure that good performance requires. The international comparisons in section 2 are, underneath, comparisons of physical infrastructure. The countries that outperform the UK have denser networks with more spectrum deployed per site, and they got them by making infrastructure easier to build. The paper's own framework in section 1 says the same thing: performance comes from site density, spectrum and technology. There is no route to the 90% benchmark that does not involve building more, and the paper searches for "UK-specific structural factors" behind our international underperformance while presenting one in its own planning analysis.

That analysis deserves more prominence than the paper gives it. A prior approval refusal rate of 96% in one local authority and 0% in another, for the same national permitted development regime, is a postcode lottery for infrastructure. Operators cannot plan efficient network upgrades against that level of inconsistency, and the areas behind the highest refusal rates are condemning their own residents to worse connectivity for years. We support the direction of the government's planning review: expanded permitted development rights, clearer legal tests for local authorities, and a widened prior notification route for upgrades with minimal visual impact. Ofcom's most useful contribution would be transparency that creates accountability, which we return to below.

From the consumer end of the market, the other barrier we observe is that congestion is network-specific and time-varying. Ofcom's Bury case study makes this point well: three networks performed consistently while one degraded at peak times. A customer on the wrong network at the wrong time has a poor experience even though good capacity exists metres away on another operator's spectrum.

That is a barrier with a demand-side solution available now. A multi-network customer moves to the least congested available network. In effect, multi-network access lets consumers use the capacity the UK has already built, across all four networks, rather than being confined to one operator's share of it. It also sharpens the quality competition this paper wants: networks that consistently underperform at peak lose multi-network traffic immediately, not at the end of a 24-month contract. Building more and using what is built better are complements, and the UK currently does neither well.

Priorities for Ofcom

- Publish planning refusal rates by local authority alongside performance data for the same areas, updated regularly. Residents and local politicians should be able to see the connection between an authority's approach to planning and the connectivity its community receives. League tables change behaviour; buried annexes do not.

- Give government clear, public evidence for the planning review that links site density to the performance outcomes this paper measures, including international comparisons of how quickly peer countries consent mobile infrastructure.
- Publish peak-time performance per network per place, so congestion is visible and comparable.
- Recognise and measure multi-network access as a congestion mitigation, alongside supply-side fixes.
- Ensure capacity improvements delivered under the Network Commitment reach wholesale-hosted customers on equivalent terms, so MVNO customers are not the buffer that absorbs congestion.

Section 5: Connectivity in indoor, shared places

We support the focus on dedicated indoor infrastructure and neutral hosts, and we would encourage Ofcom to be considerably more ambitious here, because the economics of indoor connectivity have quietly inverted and policy has not caught up.

Neutral host 5G should be the preferred solution in busy buildings, not the fallback

The traditional model treats indoor coverage as something an MNO's outdoor network delivers as a by-product, with dedicated indoor infrastructure as an expensive exception for stadiums and airports. That model made sense when indoor equipment was costly and backhaul was scarce. Neither is true any more.

Consider a typical large shopping centre. It already has the two genuinely expensive ingredients of a mobile network: high-capacity fibre (often 10 Gbit/s or more, installed for its own operations and tenants) and power throughout the building. Adding neutral host 5G small cells to that foundation is a modest incremental investment, and the result is dedicated, high-capacity coverage designed for the building, its materials and its footfall. That will outperform weak macro signal bleeding in from an external mast in almost every case, and it keeps performing at peak times, when outdoor-in coverage collapses under load.

The Co-op Live case study in the paper proves the model: a concrete and steel venue with 20,000 people inside delivered high performance at peak on every network integrated into the in-building system, while the one network not integrated performed poorly throughout. In a busy building, dedicated indoor infrastructure beats outdoor-in coverage so decisively that relying on outdoor coverage should be treated as the anomaly.

We therefore ask Ofcom to state a clear policy preference: in large, busy shared buildings, dedicated neutral host infrastructure fed by the building's existing fibre and power should be treated as the preferred delivery model, and weak outdoor-in MNO coverage should not be treated as adequate simply because a signal is technically present. Nominal coverage from an external mast that fails the good performance standard inside the building is a gap, and should be measured and reported as one.

What would make this happen at scale

The barriers are commercial and regulatory, not technical:

- Spectrum. Neutral hosts need straightforward, affordable access to suitable spectrum for indoor deployment. Ofcom's shared access licensing was a good start; it should be developed with busy-building neutral hosts explicitly in mind, so that a venue owner or neutral host operator can deploy indoor 5G with the minimum of friction.
- Integration on fair terms. A neutral host network only serves consumers if their providers are on it. MNOs should face clear expectations that they integrate with, or enable roaming onto, neutral host infrastructure in busy buildings on fair and reasonable terms, rather than

treating non-participation as a competitive tactic. The Co-op Live example shows exactly what non-participation costs consumers.

- Access for the whole retail market. Integration must carry through to wholesale customers, so that MVNO-hosted and multi-network customers benefit alongside MNO retail customers. A multi-network product like Smart SIM is the natural complement to neutral host infrastructure: whichever networks are integrated at a given venue, the customer connects to the best of them.
- Visibility. Indoor performance reporting should distinguish networks venue by venue, so consumers and venue owners can see who has and has not integrated, and landlords can hold operators to account.

For venue owners the incentive is already there: connectivity is becoming part of what makes a building lettable and visitable, in the same way lifts and air conditioning are. What is missing is a framework that makes deployment easy and integration expected. Ofcom convening landlords, neutral hosts and operators, as the paper proposes, is welcome; doing so with a stated preference for dedicated indoor infrastructure in busy buildings would give that convening real force.

Section 6: Connectivity on trains

Commuters are one of our three core customer groups, so we read this section with particular interest. Ofcom's own line-by-line data is the strongest evidence in the paper for the multi-network approach:

- Across all lines, EE met the good performance standard in 42% of tests, Three 21%, O2 20%, Vodafone 17%. But the best network varies by route: EE leads on most, O2 leads on Edinburgh to Inverness, and margins shift line by line and segment by segment.
- A single-network passenger experiences one of those columns. A multi-network passenger experiences, at each moment, the best of all four. On a route where individual networks score 45%, 13%, 25% and 12%, the union of four partially overlapping footprints is materially better than any one of them, using only infrastructure that already exists beside the track.

We support Ofcom working with government on trains, including LEO backhaul and track-to-train solutions for the long term. Our ask is simple: when Ofcom and DfT assess options for improving passenger connectivity, multi-network access should be in the option set, and reporting on train connectivity should include best-available-network performance by line. It is the cheapest and fastest improvement available, deliverable through retail products rather than trackside construction, and it is available to policymakers today, provided wholesale access terms allow products like Smart SIM to exist and scale.

Section 7: Connectivity in rural areas

Rural residents are our largest customer group, and rural reliability is the reason many of them chose a multi-network product. Two observations from lived experience of serving these customers:

First, the paper itself identifies the core problem at paragraph 7.12: even after the merger, "good connectivity by only one network may not serve the connectivity needs of everyone who spends time there." We agree completely. In rural areas each MNO's footprint has different gaps. Someone may have good coverage at home on one network and none at work on the same network. The union of the four networks' rural footprints is dramatically better than any individual footprint, and that union is accessible today through multi-network access. No new masts are required to unlock it.

Second, resilience. The paper notes that rural customers often depend on a single base station, vulnerable to storms and power cuts. For a single-network customer, that mast failing means no service. For a multi-network customer, any surviving network in range provides continuity. Multi-network access is consumer-level resilience, and it complements the infrastructure-level resilience work Ofcom is doing elsewhere.

Priorities and solutions

Ofcom lists neutral hosts, local public networks, further network sharing, satellite and spectrum sharing as options for rural areas. Wholesale-enabled multi-network access belongs on that list, and unlike most of the others it requires no construction, no public subsidy and no new spectrum. It requires one thing: wholesale access to each network on commercially competitive terms, guaranteed firmly enough that providers can invest in building on it.

We would also encourage Ofcom's rural case studies to measure best-available-network performance alongside per-MNO performance, to quantify how much of the rural reliability problem is genuinely a coverage gap (no network present) versus an access gap (a network is present, but not the customer's network).

The enabler that runs through everything: guaranteed wholesale access

Every point above reduces to the same dependency, so we finish by stating it plainly.

The reliability gaps this paper documents (urban congestion, indoor variability, trains, rural footprint gaps) are all gaps of a single network at a single moment. The UK has four overlapping national footprints. Innovative providers can and do stitch them together into connectivity consumers can count on. Honest Mobile has built this in the UK and serves over 100,000 connections with it. Others will follow if the framework lets them.

For that market-led route to Ofcom's ambition to work, three conditions must hold:

6. **Guaranteed access.** MVNOs and multi-network providers need a regulatory backstop guaranteeing wholesale access to mobile networks, with Ofcom empowered and willing to treat commercial de-platforming (pricing a provider out directly, or via pressure on upstream intermediaries) as functionally equivalent to denial of access.
7. **Commercially competitive rates.** Access at rates that make a competitive retail proposition impossible is not access. The VodafoneThree WRO should be benchmarked against bilateral market rates and revised so that it functions as a genuine access route; the same discipline should apply to any future consolidation remedy.
8. **Performance and capability parity.** Wholesale customers should be able to receive the same network performance and capabilities that hosts provide to their own retail brands, on transparent and reasonable terms, so the quality improvements this work programme tracks reach all consumers, not just MNO retail customers. Retained wholesale-layer net neutrality protections are part of this: MVNO traffic must not be deprioritised relative to a host's own retail traffic.

With those conditions in place, Ofcom does not have to choose between waiting for infrastructure and delivering reliability now. The infrastructure investment this paper describes makes every network better; multi-network innovation makes every consumer able to reach the best of them. We would welcome the opportunity to discuss any of this evidence with the team, and to contribute data from our multi-network customer base to Ofcom's ongoing measurement work.

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