

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 Orkney Islands Council supports Ofcom’s move towards a more user-focused measure of mobile quality and welcomes the use of a performance-based metric through Map Your Mobile, rather than relying solely on predicted signal availability. That is particularly important in island and remote rural areas, where broad-area coverage modelling can mask weak real-world performance. Ofcom has itself acknowledged that its current broad-area reporting has limitations for assessing service at a specific location, especially where signal strength is weak, and its mobile checker also recognises that terrain, building materials, congestion and bad weather can materially affect what users actually experience. However, we do not believe that a single 90% benchmark should be treated as sufficient evidence of “good” connectivity across all geographies. It may be useful as a national comparator, but island and remote rural communities have different risk profiles, different infrastructure dependencies and different consequences when service fails. In Orkney, a major subsea cable outage earlier this year showed that communications can appear adequate in normal conditions but still fail in ways that have severe local impacts when wider infrastructure is damaged. Following damage to the subsea cable between Evie and the island of Westray on 16 March 2026, residents experienced disruption not only to broadband but also to digital phone lines, card-payment systems and some mobile 4G services, with full restoration for the affected North Isles not achieved until 18 April 2026. That type of connectivity failure is not well captured by a single pass-rate benchmark. We therefore consider the 90% figure to be a useful starting point, but not sufficient on its own for rural and island communities. Over time, Ofcom should evolve the measure to include greater emphasis on service continuity, resilience, variability and recovery, particularly in locations where there is limited mast overlap, limited transport access for maintenance, and greater exposure to severe weather and power

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	disruption. A metric that reflects whether people can rely on service when systems are under stress would be more meaningful than one that focuses only on typical conditions.
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 need information that reflects actual user experience, not simply predicted outdoor signal. In Orkney and similar areas, people need to know which network works indoors, outdoors, in vehicles, around harbours, on ferries, in public buildings, and in more exposed rural locations, and how likely that service is to remain usable during peak periods, poor weather or local infrastructure failures. Map Your Mobile is a positive step because it begins to move away from simple coverage claims, but there remains a gap between broad predicted performance and the kind of reliability information that households, businesses and public services need to make informed choices. Map Your Mobile would be more useful if it provided clearer information on local variability, indoor reliability and resilience dependencies, especially in island and remote rural contexts. For example, customers would benefit from understanding whether service in an area relies on a single site or single backhaul route, whether there are known weaknesses indoors, and whether an operator’s local network has a history of prolonged disruption in similar geographies. The outage mentioned above is important here: some mobile services were lost not because of a mast failure alone, but because a wider subsea backhaul dependency was damaged. Some sites had to be restored via satellite, and intermittent problems remained when demand was high. That underlines the need for more transparent information on resilience, not just nominal availability. Ofcom should also consider how Map Your Mobile can better support local authorities and public-sector stakeholders. More granular and locally meaningful information on persistent not-spots, unreliable indoor environments and transport-related weak spots

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	would be valuable for planning, emergency preparedness and infrastructure discussions with operators. If Ofcom's objective is to support informed choice and improved accountability, its tools should help users understand where service is likely to be fragile, not simply where it may work most of the time.
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 While Orkney is not a metropolitan authority, we recognise that the biggest barriers in busy centres are likely to include site access, planning complexity, local design and heritage constraints, and the challenge of delivering additional capacity in places where demand can surge sharply at particular times. Ofcom is right to identify that better outcomes will require coordinated action between operators, local authorities and site owners, particularly where infrastructure needs to be upgraded or shared in already constrained environments. From a local authority perspective, Ofcom's main priorities should be to improve transparency on where demand pressure is greatest, what types of intervention are most effective, and where infrastructure sharing or neutral-host approaches might reduce both cost and visual impact. Planning authorities would benefit from clearer evidence on what types of infrastructure solve which types of performance problem, including in streets, public buildings and transport interchanges. That would support more evidence-based decisions where digital connectivity needs must be balanced against environmental, townscape and heritage considerations. Although this section refers to town and city centres, the same principle applies to small island service hubs such as ferry terminals, harbour areas, town centres during tourism peaks, and key civic or health sites. In island settings, "busy areas" may be smaller in scale but can still experience pronounced periods of high demand, and poor performance can have outsized consequences for residents, visitors and businesses. Ofcom's future work should therefore ensure that smaller rural and island centres are not overlooked simply because they do not resemble large urban centres

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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 The biggest barriers to stronger indoor mobile performance are building fabric, weak indoor penetration from outdoor networks, limited commercial incentives to improve service in lower-density locations, and insufficient coordination between property owners, operators and infrastructure providers. Ofcom's own checker acknowledges that building materials can have a significant effect on reception. In island and rural areas, where there may be fewer nearby sites and less redundancy in the surrounding network, these indoor challenges can be magnified. Ofcom's priorities should include improving the evidence base on indoor performance in public and shared spaces such as schools, health facilities, care settings, community hubs, ferry terminals and council buildings. We would particularly welcome a stronger focus on places where indoor connectivity supports essential services and community resilience. The most recent North Isles incident illustrated how quickly the dependence of schools, GP practices and public sites on digital communications can become a serious operational issue when wider infrastructure is disrupted. While that outage was not solely an indoor coverage issue, it showed how vulnerable essential public services can be when digital communications inside buildings are not resilient. The most useful further insight from Ofcom would be clearer operator-by-operator indoor performance comparisons, better evidence on which interventions most effectively improve indoor service, and more place-based analysis of where indoor vulnerability overlaps with critical public services. That would help local authorities and public-sector partners prioritise sites where poor indoor mobile performance has the greatest social and operational impact.
Section 6: Connectivity on trains • What do you think are the biggest barriers, technical and commercial, to achieving better mobile performance	Confidential? – N We agree with Ofcom's proposal to work with government to support better mobile connectivity on trains. Ofcom's own research found that mobile performance on trains is often poor and identified both weak trackside signal and the difficulty of radio signals penetrating some carriage types as key barriers.

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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?	Those findings reinforce a wider principle: people increasingly expect reliable connectivity throughout the journey, not just at the start and end points. Although Orkney does not have a rail network, the underlying issue is directly relevant to island transport. For us, the comparable challenge is ferries, harbours and inter-island journeys. Orkney Ferries serves thirteen island destinations, undertakes more than 20,000 sailings each year, and carries around 336,000 passenger journeys annually. In the Orkney context, mobile service on and around ferries is not a luxury; it increasingly supports safety, public information, work, bookings, service access and reassurance during disruption. The most useful further insight Ofcom could provide would be route-based performance evidence, analysis of infrastructure barriers along transport corridors, and evidence on which technical or commercial interventions deliver the greatest improvement for users. We would encourage Ofcom to apply the same route-based logic used for train connectivity to ferry services and island transport routes, particularly where service interruptions can have serious implications for remote communities.
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 pro-	For Orkney Islands Council, this is the most significant section of the discussion paper. The biggest barriers to better mobile performance in rural and island areas are the economics of deployment, sparse populations, difficult geography, limited mast overlap, fragile backhaul, exposure to prolonged power disruption, and the realities of maintaining infrastructure where weather and transport access can materially delay repair. In our earlier response to Ofcom on resilience guidance, we highlighted that there is minimal crossover between some masts in Orkney and that smaller islands may therefore be left with no communication services if a single site fails. We also made clear that a four-hour battery backup is unlikely to be sufficient in island settings where ferries may be disrupted for days and qualified personnel and equipment may take time to reach the site. The North Isles outage in March–April 2026 is an important and very recent example of this wider rural resilience challenge. Damage to the subsea cable between Evie and the island of Westray disrupted

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vide further insights on in relation to rural connectivity and why?	broadband, digital telephony, card-payment systems, some mobile 4G services, schools, GP practices and homes across islands with a combined population of around 1,700 people. Full restoration took more than a month, and mobile operators had to use satellite-based measures to restore some sites, with intermittent issues still reported during periods of high demand. This demonstrates that in rural and island geographies, the key question is not simply whether signal exists in principle, but whether the whole infrastructure chain is resilient enough to sustain service and recover quickly after failure. Ofcom's main priorities in rural locations should therefore be: (1) stronger emphasis on resilience rather than coverage alone; (2) better local evidence on reliability and variability; (3) more meaningful focus on transport routes, public service sites and island communities; and (4) stronger encouragement of shared infrastructure and partnership models. These priorities are consistent with Ofcom's own recognition that mobile connectivity now underpins daily life and that better outcomes will require coordinated action across industry and the public sector. The outcomes we should aim to achieve are not just wider coverage, but fewer prolonged outages, better restoration capability, stronger indoor and route-based performance, and greater transparency about localised gaps in service quality. There are also wider examples supporting this case. The Shared Rural Network has improved national rural 4G coverage and demonstrates the value of coordination and mast sharing, but headline national progress can still mask acute local vulnerability. This points to the need for technical, commercial and policy solutions that include shared infrastructure, better use of public-sector assets, stronger power and backhaul resilience, targeted action on transport corridors and island routes, and more structured contingency planning between operators and local resilience partners. In an island context, collaboration is often the only realistic route to more resilient delivery. The most useful further insight Ofcom could provide in relation to rural connectivity would be: localised evidence on persistent not-spots and unreliable areas; performance and resilience data for ferries, rural

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	routes and public service sites; information on restoration times and outage impacts in remote geographies; and clearer operator-level comparisons in island and rural conditions. That would give local authorities, communities and public agencies a more realistic basis for understanding whether national improvements are translating into meaningful change on the ground.

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