

Suffolk Chamber of Commerce Response to:

Ofcom's 'Connectivity You Can Count On' discussion paper

By email to: mobileconnectivity@ofcom.org.uk

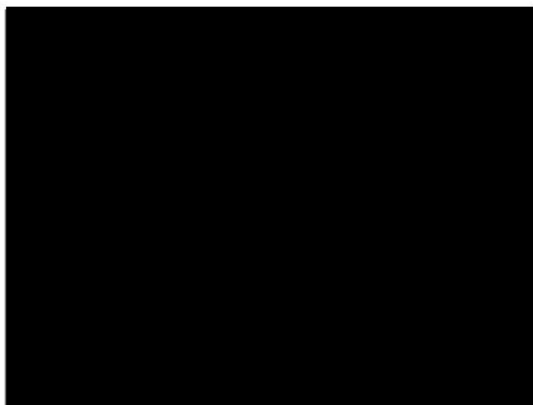
Monday 27th July 2026

To whom it may concern at Ofcom,

Suffolk Chamber of Commerce welcomes the opportunity to respond to Ofcom's 'connectivity you can count on' discussion paper on achieving good, reliable mobile performance. We are a county-wide, place-based, and British Chambers of Commerce accredited organisation directly and indirectly representing thousands of businesses of all sectors and sizes across Suffolk, many of whom rely on good mobile connectivity for critical business operations. Our reach also extends into the thousands when considering the wider region as a whole, including through joint working programmes such as Chambers East.

On behalf of, and in consultation with our membership, we have outlined some of the concerns affecting Suffolk businesses in our response below. We trust that you will take these views into consideration and look forward to seeing the outcomes as work in this area progresses.

Yours sincerely,



Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Nothing
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	N/A

Your response

Question	Your response
Section 2: The quality of mobile connectivity we want to see - What are your views on the use of the Map Your Mobile good performance metric and how should the measure evolve over time? What are your views on the usefulness of: - the 90% figure as a benchmark applicable across geographies and	Any benchmark should aim to reflect and improve real-world business experience. To this end, the Map Your Mobile metric is a useful measure of good quality mobile performance for Suffolk businesses, at least where a mobile connection can be made. The ambition of a 90% figure as a benchmark applicable across all business-relevant locations including rural, coastal, and indoor and transport corridor environments is welcome insofar as it is used to raise the quality of mobile signal for businesses. The importance of consistent coverage in all business environments, including when travelling, is key to good local growth, with 77% of those we surveyed reporting that their business cannot function

Question	Your response
based on crowdsourced data?, and • Whether the 90% benchmark is realistic and sufficiently ambitious?	when there is unreliable connectivity, and 69% reporting that unreliable or weak signal across Suffolk is causing problems for business operations. However, the vast majority of those in Suffolk see improving coverage, particularly in rural and coastal areas, as the key barrier to improving mobile connectivity, and do so over and above improving signal speed and signal reliability. This is demonstrable in our latest survey where an overwhelming majority of 81% said better coverage in rural/coastal areas is what would matter most to their business, above fewer dropouts, faster speeds and better urban coverage. Given that using crowdsourced data will diminish the relevance of reducing signal not-spots, it is vital that Ofcom's definition, or any other definition of good quality signal, is used in conjunction with measures designed to improve mobile coverage. Only a definition of good signal which accounts for both the ability to connect to the internet, and the quality of connection together, ensures that mobile connectivity needs will be held to a reasonable standard that meet business expectations across Suffolk. Moreover, any benchmark which is measured against maximum quality standards (i.e. the signal quality achieved by at least one MNO) as opposed to the minimum quality standards which more accurately reflect business needs (i.e. the lowest available quality that has been achieved by all MNOs in an area) will be insufficient, given its distortion of the reality of businesses' mobile connectivity. Good connectivity should mean good quality connectivity for all employees in Suffolk, not just the theoretical maximum quality of connectivity available to them.

Question	Your response
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?	Suffolk businesses need transparency on localised mobile network performance data. The Map Your Mobile tool is useful insofar as providing a breakdown of location specific data by MNO, and giving a rough idea of where not-spots are likely to be located – data which are vital to support business planning in rural areas like Suffolk. However, individual measures including speed, reliability, latency and peak-time performance for indoor and outdoor use are also useful for businesses, alongside the generalised measures used on the Map Your Mobile tool which determine ‘good’ based on multiple measures.
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?	Ofcom should be regularly consulting and engaging with businesses, and business representative organisations like Suffolk Chamber of Commerce to ensure that plans to improve connectivity for town and city centre businesses take their concerns into consideration. Suffolk Chamber would support a range of interventions including capacity upgrades in town centres and dedicated indoor infrastructure, and where possible Ofcom should be trying to use its powers to encourage early engagement between developers and mobile infrastructure providers, so that suitable sites and future connectivity needs are identified and can be incorporated before development commences. Feedback provided to Suffolk Chamber has highlighted that a historical lack of engagement has frequently led to missed

Question	Your response
	opportunities and difficulties in upgrading infrastructure as needed.
Section 7: Connectivity in rural areas • What do you think are the biggest barriers to achieving better mobile performance in rural locations and why? • What do you think should be Ofcom's main priorities for our future work in rural locations and what outcomes should we aim to achieve? • What solutions (technical, commercial, policy or delivery) could improve rural mobile performance? • What information would you find useful for Ofcom to provide further insights on in relation to rural connectivity and why?	Business evidence gathered by Suffolk Chamber clearly indicates that coverage is the biggest barrier to achieving better mobile performance in rural areas, and improving this would matter most to 81% of the organisations we surveyed; data also indicates that fewer dropouts and faster speeds are important. Insufficient coverage is leading to lost sales, slower growth and reputational damage from card machine failures, increased operational downtime, and a lack of confidence to invest across a range of sectors in our area including the arts, hospitality, logistics and manufacturing. As above, Ofcom should be regularly consulting and engaging with businesses, and business representative organisations like Suffolk Chamber of Commerce to ensure that plans to improve connectivity for rural businesses take their concerns into consideration. Suffolk Chamber would support a range of interventions including targeted rural pilots and aim to eliminate 4G and 5G not-spots. As in developed areas, where possible Ofcom should be trying to use its powers to encourage early engagement between developers and mobile infrastructure providers, so that suitable sites and future connectivity needs are identified and can be incorporated before development commences. Feedback provided to Suffolk Chamber has highlighted that a historical lack of engagement has frequently led to missed opportunities and difficulties in upgrading infrastructure as needed.

Question	Your response
	Where supportive of business connectivity needs, Suffolk Chamber would also encourage alternative connectivity solutions beyond and alongside improvements to traditional mobile infrastructure, and have had some feedback that both improved satellite-based solutions and a market which better supports swapping between mobile networks would be well received in rural areas.

Please tell us how you came across this discussion paper.

Email from Ofcom