

## Your response

techUK strongly welcomes this discussion paper from Ofcom, and in particular the shift from measuring coverage towards measuring real-world performance. This shift is consistent with our own belief that headline coverage figures mask a weaker performance picture, and that it is performance that determines whether digital applications and AI-enabled tools can be adopted at scale across the country and economy.

Closing the gap between nominal availability and real-world performance, for which the UK is the lowest-ranked G7 economy and [among the lowest of the OECD countries](#), is as important a policy challenge as extending coverage, and we are pleased to see Ofcom frame the issue in these terms, and recognise that many stakeholders across the entire ecosystem have a part to play.

**A shared responsibility approach to delivery.** Government and Ofcom seek high levels of investment, strong coverage and quality, and affordable prices but under current market conditions these objectives are increasingly difficult to deliver simultaneously. The government's Mobile Market Review call for evidence acknowledges that industry estimates up to £34 billion of investment may be required to deploy advanced 5G by 2030, and that delivery by all operators is not guaranteed. Where the outcomes sought are not commercially viable, government and Ofcom should be prepared to share responsibility for delivery, including through funding and reform, and to be cautious and proportionate about imposing further obligations without corresponding support. This was the central conclusion of techUK's Mobile Market Review response, and it applies directly to the ambitions in this paper. Crucially, this does not mean a binary decision between commercial delivery and public funding. Shared infrastructure is a third investment lever that already plays a significant role in an increasingly disaggregated market. Mobilising these actors, alongside operators and government, helps to narrow the size of funding gaps.

**An opportunity to give practical effect to the growth duty.** This is an ideal opportunity for Ofcom to demonstrate how it applies its growth duty. In techUK's assessment the growth duty has not yet translated into meaningful reductions in regulatory burden or stronger investment incentives, and this work programme is a chance to change that. Better mobile connectivity is a foundational enabler of productivity and growth, and the ambition set out here should be understood as "good growth" i.e. delivering higher quality for consumers and the conditions for transformative economic activity, rather than focusing on price alone. Quality is itself a core consumer and citizen interest, and we encourage Ofcom to reweight its approach towards promoting long-term investment alongside short-term consumer-price considerations.

**Performance ultimately depends on the investment environment.** Better networks require sustained investment and network densification, shaped by conditions that sit partly within Ofcom's remit and partly beyond it, in one of Europe's most competitive and lowest-margin mobile markets. We note Ofcom's wish not to make this debate solely about money, but annual licence fees, energy costs, security and resilience obligations, planning, litigation costs and business rates have accumulated incrementally without a holistic assessment of their combined effect, and we encourage Ofcom and government to review them in the round. We would also note that fixed wholesale markets have, over time, developed pricing floors to protect long-term competitive investment; mobile has not, and there may be value in Ofcom considering whether that difference in approach remains justified or at least seek to learn from the fixed sector any findings. A material share of industry capital is also spent each year simply replacing sites lost to notices to quit that create months- or year-long coverage issues, therefore maintaining at best current quality rather than enhancing it. Spectrum

policy should form part of this investment assessment, including the availability of suitable spectrum, the cost and conditions of access, and whether regulatory frameworks provide sufficient flexibility for operators and other connectivity providers to deploy capacity where demand arises.

**A clear distinction between commercial and uncommercial areas.** We welcome Ofcom’s recognition that the four focus areas differ in nature. In broadly commercial areas (urban environments and busy indoor public spaces), the priority is removing the barriers that prevent the market from delivering. In areas that are not commercially viable for individual operators (trains and the most remote rural locations) the market alone will not deliver, and public funding, backing and coordination will be required.

**A fair distribution of obligations across the market.** The growth of MVNOs and new market entrants has increased competition and consumer choice, and the resulting affordability benefits should be preserved. It does, however, raise questions of regulatory asymmetry as a growing share of consumers is served under a lighter regime with reduced exposure to resilience and consumer-protection obligations. As Ofcom considers how quality improvements will be funded over time, techUK encourages a review of whether obligations around resilience, security and consumer protection are distributed fairly and consistently across all market participants.

**Do not ignore resilience as a major challenge.** Across each of the focus areas in this paper, connectivity is only as valuable as it is resilient, and as reliance on mobile deepens across the country, the cost of any outage increases. With more extreme weather now commonplace, resilience deserves to be treated as a primary consideration rather than an add-on. Yet the financial and obligation burden falls almost entirely on mobile network operators, while MVNOs and new virtual entrants carry little or none of it. Layering further resilience requirements on top of new coverage and quality obligations, without corresponding funding from government or a fairer sharing of the load, is not realistic.

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| <p><b>Section 2: The quality of mobile connectivity we want to see</b></p> <ul style="list-style-type: none"> <li>What are your views on the use of the Map Your Mobile good performance metric and how should the measure evolve over time?</li> </ul> <p><b>What are your views on the usefulness of:</b></p> <ul style="list-style-type: none"> <li>the 90% figure as a benchmark applicable across geographies and based on crowdsourced data?, and</li> <li>Whether the 90% benchmark is realistic and sufficiently ambitious?</li> </ul> | <p>Confidential? –N</p> <p>We welcome the move to a defined standard for “good” performance combined with a consistency benchmark. Establishing what good looks like, and attaching a measure of how reliably it is achieved, is a significant and overdue step beyond a binary, coverage-based paradigm; in effect moving from a one-dimensional measure of availability to a two-dimensional view that captures both whether a service is available and how well it performs. Members particularly welcome that the metric is grounded in reliability rather than peak headline speeds: for the activities most people undertake on the move, availability and consistent performance at the proposed thresholds is what matters.</p> <p>To give this practical effect, techUK supports a joint industry-Ofcom process to develop measured-experience metrics sitting alongside the existing predicted-coverage</p> |

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|          | <p>framework. Crowdsourced data is a sound and pragmatic basis for this. It is the best available reflection of how people actually use their devices, in the places they actually use them. We would highlight one important caveat that Ofcom itself acknowledges in that crowdsourced measurements capture places where a connection is attempted, and therefore under-represent genuine not-spots where no connection is possible. Both signal availability and real-world performance matter, so the two should continue to be assessed in parallel.</p> <p>On evolution, the proposed thresholds (5 Mbit/s download, 1.5 Mbit/s upload, 50ms latency) are a reasonable floor for the mainstream applications most people use today, but they should not be read as an adequate 5G ambition in their own right. A 5 Mbit/s download is roughly one-twentieth of the 100 Mbit/s user-experienced data rate specified for 5G in ITU-R M.2410, and both France and Germany have already set materially more ambitious, output-based targets through licence obligations. Calibrating the standard only to what most people use today risks locking in a lower ceiling than comparable markets have already committed to, and than the enterprise and innovation use cases the growth duty is intended to enable will require. These are not, however, expectations to be raised only at some unspecified future point: to give an effective investment and demand signal, more demanding targets need to apply now in the contexts that require them, through the tiered, outcome-based structure set out below. Capacity that is adequate today is quickly outstripped; coverage and performance are moving targets, not fixed achievements. We encourage Ofcom to build in a regular, evidence-led review cycle tied to observed shifts in application demand.</p> <p>In evolving the metric, it will also be useful to distinguish between non-standalone 5G which runs over the 4G core and mainly improves speed, and 5G standalone (5G SA), which is the technology that unlocks the low-latency, higher-reliability performance on which the more demanding future use cases depend. Headline “5G availability” figures currently conflate the two, and as standalone networks are rolled out the metric — and in</p> |

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|          | <p>time its latency thresholds — should reflect that distinction.</p> <p>--</p> <p>A single, transparent and trackable benchmark has real value as a common reference point and as a means of monitoring progress over time, including at MNO and postcode-district level. In that sense the 90% benchmark is a welcome and useful foundation.</p> <p>Members consider a benchmark at this level achievable over time, particularly in light of network developments now underway and the competitive responses it is prompting. The extent to which market-led developments alone will close the gap remains uncertain, as the paper acknowledges, and will vary significantly by location. It is worth recalling that the UK already performs comparatively well on coverage and 5G availability by at least one network (with coverage by all three MNOs materially lower); the principal gap is one of capacity, which is where the benchmark should drive improvement.</p> <p>On enforcement, techUK sees the benchmark's principal value as a shared, transparent reference point for tracking progress rather than as a rigid, enforceable obligation. Consistent with a shared-responsibility approach, it should not be converted into a hard target without the corresponding funding, backing and reform needed to make delivery achievable.</p> <p>In terms of ambition, here we encourage Ofcom to go further. A single benchmark applied uniformly everywhere risks becoming a lowest-common-denominator measure. If the objective is to support transformative economic growth, and to give effect to the growth duty, there is a strong case – which techUK set out in its Mobile Market Review response – for a tiered, outcome-based framework aligned to economic priorities rather than a single national floor. Higher expectations should apply in dense urban centres, AI Growth Zones, Industrial Strategy priority sectors and major transport corridors, with meaningful baseline improvements elsewhere. This need not be prescriptive or one-size-fits-all, and Ofcom should work with industry to define what “good” looks like in each context.</p> |

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|                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>On international ambition, moving the UK from the bottom third towards the top third of OECD countries is the right direction, but peer markets are investing simultaneously; the UK should calibrate its ambition against where leading markets are likely to be in future, not where they stand today. International league tables should also be read with care, since genuine structural differences will obviously affect outcomes. The benchmark will only translate into delivery if it is paired with the right conditions and incentives to invest for the private sector.</p> <p>There is also a strong case for framing ambition in relative rather than absolute terms. A fixed figure such as “90% by a given date” loses its force the moment it is met, whereas a standing commitment to reach and remain within, say, the top tier of OECD or comparable economies would keep raising the bar as other countries advance, and would sit naturally with Ofcom’s duty to look internationally. Under such an approach Ofcom would report each year on where the UK sits against its peers and what is needed to hold or improve that position, turning the benchmark into a continuous driver of improvement rather than a one-off milestone. By framing it this way, ambition would not be undermined by the fear of falling short: aiming high and delivering most of the gain is a better outcome than setting a low bar and meeting it, and it avoids a target that can inadvertently cap investment at the minimum required.</p> |
| <p><b>Section 3: Market-led improvements in mobile network quality</b></p> <ul style="list-style-type: none"> <li>• 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?</li> <li>• How well does Map Your Mobile currently meet customer and stakeholder needs, and what specific improvements would make it more useful?</li> </ul> | <p>Confidential? – N</p> <p>Consumers still choose predominantly on price, and the market currently under-rewards quality even though parameters including time without signal are very important for consumers. The central gap is the absence of accessible, comparable and trusted information about quality at the point of decision. If consumers can understand and act on differences in signal availability and quality, this strengthens competition on quality and, in turn, the commercial case for investment. Therefore, better information is not only a consumer-protection measure, but a driver of the investment Ofcom wants to see.</p> <p>Our members have identified gaps including: a lack of standardised, consistent metrics so that quality claims</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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|                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p>from different providers and price-comparison sites are not genuinely comparable; the absence of a single authoritative source of truth against which competing claims can be assessed; and a lack of information that reflects the reality that people are mobile.</p> <p>Postcode-level data is useful but given customers move between home, work and travel, it does not fully capture the experience of being a customer. There is a case for complementary, comparative national reporting (perhaps similar to current comparisons on complaints reporting), alongside granular local data.</p> <p>--</p> <p>Map Your Mobile is a strong start and its reach is welcome, given Ofcom has claimed over a million visits since it was launched. To make it more useful for consumers we believe there should be standardised quality metrics embedded directly on price-comparison websites, so consumers encounter comparable information where they make decisions as well as comparative 'good coverage' league-table reporting that reflects mobility.</p> <p>Further, the increasing use of third-party quality testing by local authorities suggests that existing information may not always provide the level of local insight stakeholders require. As the checker relies partly on predictive modelling from operators, discrepancies are being reported and the lack of reliability may hinder the tool in the future unless said limitations are addressed.</p> |
| <p><b>Section 4: Connectivity in busy areas</b></p> <ul style="list-style-type: none"> <li>• What do you think are the biggest barriers to achieving better mobile performance in town and city centres and why?</li> <li>• What do you think should be Ofcom's main priorities for our future work in this area?</li> <li>• What information would stakeholders, especially local authorities / planning authorities find useful for Ofcom</li> </ul> | <p>Confidential? – N</p> <p>The urban challenge for mobile is principally one of capacity and density under load, rather than coverage. Existing networks in towns and cities are optimised for wide-area coverage; this structure cannot always absorb the concentrated peak demand of a modern urban economy at the times and places it occurs. Demand continues to grow rapidly and there are locations where congestion persists even where operators have deployed the spectrum available to them at a site. Urban performance is not, however, solely a question of spectrum scarcity, with research showing that operators holding similar spectrum assets have adopted materially different de-</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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| <p>to provide further insights on and why?</p> | <p>ployment strategies. In many locations the binding constraint is therefore how extensively licensed spectrum is actually deployed, rather than a shortage of spectrum as such. We would encourage Ofcom to ensure its diagnosis reflects how networks are actually designed, including by building a clearer picture of densification and small-cell deployment.</p> <p>Urban performance is not solely a question of spectrum availability. In many locations, performance depends on how extensively existing spectrum holdings are deployed, together with network density, site availability and backhaul capacity. In the most heavily loaded locations, however, operators may already have deployed the spectrum available at a site and still experience congestion. Ofcom should therefore consider spectrum availability, spectrum deployment and network densification together when assessing the causes of poor urban performance.</p> <p>The barriers to densification and to site upgrades more generally are well illustrated by Ofcom's own analysis as wide and unpredictable variation in planning refusal rates and timescales between local planning authorities; the constraints of protected-area designations in precisely the dense centres where capacity is most needed and the narrow scope of the prior-notification route. A further and under-recognised barrier is the loss of existing sites through notices to quit (NTQs) and redevelopment: a material share of industry capital each year is spent simply replacing lost sites, thereby leaving operators running to stand still rather than adding the capacity urban areas need. These factors sit largely outside Ofcom's direct remit but are central to the investment ecosystem and cannot be ignored in a discussion of urban performance. These planning barriers, and the appropriate remedies, also vary across the UK's nations: planning is devolved and Scotland operates a distinct regime while Wales broadly follows England, yet telecoms is reserved, so a single UK-wide benchmark or set of planning expectations can pull against devolved planning reality. Any diagnosis and recommendations should reflect this rather than assume a uniform national regime,</p> |

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|                                                                                                                                                                                                                            | <p>and be developed with the devolved administrations where relevant.</p> <p>On NTQs, because operators are not able to share a consolidated view of which sites are being removed, there is no single picture of where coverage is being lost — to the point that parts of even well-served cities can quietly host not-spots. There could be real value in a shared, competition-safe view for government and the regulator of which sites have been decommissioned and the resulting coverage impact, and in allowing operators to work together, within clear competition safeguards, to remediate the gaps this creates.</p> <p>--</p> <p>Information includes granular local performance data, tools to benchmark a local area, track progress over time and shared good practice on planning success stories and how local authorities can use their assets and adopt constructive planning and street-works processes. We also welcome the paper's quantitative research on how connectivity matters to different communities and more vulnerable users and encourage Ofcom to develop it and put it in front of the place-making teams that shape local strategy, not only local-authority digital teams. Ofcom should help local authorities to make the case for supporting deployment through clear messaging on planning and access attracting investment.</p> <p>Beyond data and benchmarking tools, there is a more fundamental gap in how the case for deployment is made locally. Within the local authority community, there is often a split in mindset between economic growth and digitalisation advocates, versus planning stakeholders who are more responsive to local objections. Bridging these two perspectives is paramount.</p> |
| <p><b>Section 5: Connectivity in indoor, shared public places</b></p> <ul style="list-style-type: none"> <li>What do you think are the biggest barriers to achieving better mobile performance indoors and why?</li> </ul> | <p>Confidential? – N</p> <p>There are technical barriers but the most significant barriers to serve indoor traffic using cellular technology are commercial and coordination related. Good indoor connectivity in busy shared spaces typically requires dedicated in-building infrastructure rather than reliance on outdoor networks, and that requires alignment between building owners, operators and, in some cases, neutral-</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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| <ul style="list-style-type: none"> <li>• What do you think should be Ofcom's main priorities for our future work in this area?</li> <li>• What information would you find useful for Ofcom to provide further insights on in relation to connectivity indoors and why?</li> </ul> | <p>host providers whose incentives may not naturally align over who funds and benefits from the solution. Operators generally invest in in-building solutions only at flagship venues and elsewhere building owners and developers increasingly need to take responsibility for connectivity as part of how their buildings are designed and managed. Further, in today's business climate many businesses are diverting capital towards immediate operational needs rather than long-term infrastructure investments which would include connectivity projects.</p> <p>High-quality indoor connectivity should be considered as an integrated connectivity challenge rather than solely a cellular coverage issue. Dedicated cellular systems, neutral-host infrastructure and high-performance Wi-Fi can play complementary roles, with the appropriate solution depending on the venue, user requirements and commercial model.</p> <p>The evidence base supports this. The Greater Manchester case study, and the Co-op Live example cited in the paper, show that buildings designed or upgraded with connectivity in mind perform markedly better.</p> <p>In other geographies, mobile operators have elected to enable seamless Wi-Fi authentication using Passpoint technology across their device portfolios. These operators can benefit from the accelerated adoption of Passpoint-based access by a wide variety of indoor locations.</p> <p>In the UK, the Federated Wi-Fi specification defined by the FedWiFi forum sets out a harmonised authentication framework for public Wi-Fi. Similar to other federated Wi-Fi approaches, this system assumes the procurement, provision and operation of the indoor wireless network equipment is the responsibility of the venue.</p> <p>techUK also welcomes Ofcom's recognition of the role that the 6 GHz band can play in supporting higher-capacity Wi-Fi in busy indoor venues. Continued development of the 6 GHz regulatory framework, alongside cellular and neutral-host solutions, can provide additional capacity and flexibility to address growing indoor connectivity demand.</p> <p>--</p> |

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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>Ofcom should consider indoor connectivity holistically, recognising the complementary roles of dedicated cellular infrastructure, neutral-host systems and high-performance Wi-Fi. This should include examining how federated Wi-Fi and Passpoint can enable seamless connectivity, supporting the development of higher-capacity Wi-Fi through the 6 GHz regulatory framework, and providing practical guidance to building owners and developers on connectivity planning and available technical solutions.</p> <p>--</p> <p>Venue-level performance data, clear guidance for building owners and developers on the available technical options and good practice, and support for the coordination and demand aggregation needed to make in-building investment viable.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p><b>Section 6: Connectivity on trains</b></p> <ul style="list-style-type: none"> <li>• What do you think are the biggest barriers, technical and commercial, to achieving better mobile performance on trains? Which are most significant and why?</li> <li>• Do you agree with our proposal to work with government to support improvements in train connectivity?</li> <li>• What information would you find useful for Ofcom to provide further insights on in relation to connectivity on trains and why?</li> </ul> | <p>Confidential? – N</p> <p>Rail connectivity has long been and continues to be an issue across this country, achieving significant levels of media and political interest. As Ofcom’s <a href="#">own research from June 2026</a> on mobile performance shows, passengers are typically offered a poor-quality service.</p> <p>The technical barriers are well understood, from rural coverage to in-carriage penetration loss and tunnels. The most significant barriers, however, are commercial and one of issue ownership. The commercial case for individual operators to invest in track-side infrastructure is weak relative to the high cost and technical difficulty, and the business case for train operating companies is also constrained. This is fundamentally an issue of economics and responsibility rather than a purely technical one.</p> <p>Of the four focus areas, rail is the one most dependent on public-sector coordination and funding. It is also the area where progress requires the largest number of parties to act together, and is therefore least within the gift of operators to fix alone. We would not suggest this displaces the importance of the other three areas, nor that the market alone should be expected to resolve them, but rail is where Ofcom’s convening role and government partnership are most needed.</p> |

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|          | <p>--</p> <p>We welcome and support this. Because train connectivity is not currently commercial, meaningful improvement will require public funding, backing and partnership, and treating the planned upgrade from GSM-R to FRMCS as a once-in-a-generation, time-limited opportunity to get rail connectivity right and avoid repeating the mistakes of earlier technology transitions. We would add one note of caution echoed by members: shared and neutral-host solutions can reduce cost and complexity, but they rarely turn an uneconomic case into an economic one on their own, so they should be pursued alongside, not instead of, public investment. Public co-investment should also be directed to deliver the best value for the taxpayer. In particular, the FRMCS programme is an opportunity to fund trackside infrastructure specified from the outset to serve both rail-safety communications and commercial mobile networks in parallel, solving two problems at once. GSM-R was not designed on this basis, leaving a legacy of trackside infrastructure that is neither sited nor equipped to support both uses together; the transition to FRMCS should avoid repeating that mistake.</p> <p>Delivery has historically been held back less by technology than by the number of parties involved and the difficulty of working with them. Better coordination between the Department for Transport, Network Rail and its telecoms function is essential, and the transition to Great British Railways is an opportunity to establish mobile connectivity as a standard expectation. Poor captive portal experiences and the inability of some corporate devices to connect to public Wi-Fi means reliable mobile connectivity is what business and commuting passengers actually need. The Emergency Services Network, which delivers critical services over shared infrastructure, demonstrates that shared infrastructure can support demanding service requirements when supported by appropriate commercial and contractual arrangements. Train backhaul connectivity using satellite platforms providing connectivity to on-train safety, cellular and Wi-Fi systems is another emerging model that can dramatically improve coverage of the rail corridor, but as CNI, digital sovereignty and control must be a key consideration.</p> |

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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <p>--</p> <p>Information includes consistent, ongoing route-level performance reporting so that progress can be tracked and interventions evaluated, benchmarking against comparable international networks where data allows and clarity on the outcome of Ofcom's review of whether additional spectrum is needed for train connectivity.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p><b>Section 7: Connectivity in rural areas</b></p> <ul style="list-style-type: none"> <li>• What do you think are the biggest barriers to achieving better mobile performance in rural locations and why?</li> <li>• 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?</li> <li>• What solutions (technical, commercial, policy or delivery) could improve rural mobile performance?</li> <li>• What information would you find useful for Ofcom to provide further insights on in relation to rural connectivity and why?</li> </ul> | <p>The fundamental barrier is economic as lower population density means lower commercial returns on investment, compounded by coverage gaps, the limited capacity of the low-frequency spectrum on which rural coverage often depends, and resilience challenges such as power outages and dependence on a single base station. These are longstanding issues that continue to make traditional infrastructure difficult and costly to build, as the experience of the Shared Rural Network shows.</p> <p>It is helpful to distinguish two different problems that the paper tends to treat together. The first is genuine not-spots which the Shared Rural Network (SRN) was intended to address. The second, which receives less attention, is populated rural areas i.e. villages and small towns where sites already exist but performance is limited. Here the questions are whether there are enough sites at sufficient density and in a condition to host more equipment, and how fully operators are able to deploy the spectrum and carriers they hold on existing sites. Greater transparency on this second category would help target effort where people actually live and work.</p> <p>A related gap is the absence of a funding mechanism for areas that already have coverage that is simply not good enough. The SRN was designed for genuine not-spots that were not commercially viable and therefore had no coverage from anyone. It does not address the "semi-rural" and suburban-fringe areas where coverage exists but capacity has not kept pace with how people now use their devices. There is a real risk that the most remote areas end up better served than these busier fringe locations. Government will need to work through what subsidy mechanism could support this middle category without distorting competition, and what should follow once the SRN programme concludes.</p> |

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|          | <p>--</p> <p>Ofcom should prioritise identifying where connectivity gaps are likely to remain after current market developments and the Shared Rural Network have taken effect, with particular attention to populated rural and semi-rural areas where coverage exists but performance remains inadequate. It should distinguish between genuine not-spots and areas suffering primarily from insufficient capacity, and work with government and industry to identify proportionate interventions where commercial investment alone is unlikely to deliver the required improvement.</p> <p>--</p> <p>Solutions include full delivery of the VodafoneThree merger and Network Commitment, with monitoring of where gaps persist, better use of existing assets in populated rural areas supported by transparency and the right incentives to invest, targeted public funding for genuinely uncommercial areas and satellite and direct-to-device services as a complement for the deepest rural areas, not a replacement for terrestrial networks. At present, satellite and direct-to-device services cannot deliver the same quality as terrestrial networks, which reinforces their role as a complement rather than a substitute. The role of satellite should be weighed against resilience and digital-sovereignty considerations, and consumer protections and quality standards should apply consistently regardless of the technology used, so that consumers relying on non-terrestrial networks do not lose the protections they currently enjoy.</p> <p>Members consider that spectrum sharing alone is unlikely to resolve the fundamental economics of rural connectivity: spectrum may remain unused because deployment is uneconomic rather than because access to spectrum is unavailable. Nevertheless, sharing may have a role in specific local, private or innovative deployment scenarios and should be assessed on the basis of demonstrated demand and viable deployment models.</p> <p>--</p> <p>Consistent rural performance disaggregation, transparency on infrastructure and spectrum deployment in pop-</p> |

| Question | Your response                                                                                                                                               |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | ulated rural areas and analysis of where residual coverage and performance gaps are expected to remain after current market developments have taken effect. |

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