

Welsh Government Response to Ofcom Discussion Paper: *Connectivity You Can Count On*

Introduction

Welsh Government welcomes Ofcom's discussion paper and its recognition that mobile connectivity is now essential for economic participation and productivity, public services, social inclusion and personal safety. Welsh Government supports Ofcom's ambition to improve the quality and reliability of mobile services across the UK and agrees that a greater focus on real-world user experience is needed. Wales is not simply asking others to act, however, but is prepared to play its own part in contributing to this agenda. Set out below is Welsh Government's view on how Ofcom could ensure that their future work reflects the needs of Wales.

Section 2 – The Quality of Mobile Connectivity We Want to See

Map Your Mobile metric

Welsh Government supports the principle of moving beyond simple coverage metrics towards measures that better reflect consumers' actual experience. However, relying heavily on crowdsourced data risks underrepresenting locations where little or no connectivity exists.

Not-spots and areas of very poor connectivity may generate limited or no user data precisely because users cannot access services. This creates a risk that the areas most in need of intervention are overlooked. Welsh Government encourages Ofcom to supplement crowdsourced information with targeted investigation of locations where little or no data is available. Welsh Government would also welcome greater clarity regarding how evidence gathered through other independent performance monitoring, such as drive testing, could be used to identify persistent underperformance and drive remedial action where network quality continues to fall below expectations.

Ofcom should also make the supporting Wales-specific data that underpins its analysis, including performance by operator, local authority area and rurality classification, available to Welsh Government. This would help Welsh Government, local authorities and regional partners identify persistent gaps, understand whether interventions are working and target support where the need is greatest.

At a national level, meaningful coverage is where services can be accessed through any and all of the three Mobile Network Operators. If Ofcom is going to succeed in its endeavours to improve the quality and reliability of mobile services across the UK, then it is imperative effort and focus coalesces around all-operator availability, quality and resilience. Ofcom should measure the coverage floor, not the coverage ceiling and seize the opportunity to ensure that consumers are no longer penalised by their choice of operator through poor, patchy or inconsistent service as they move throughout the UK.

90% Benchmark

Welsh Government supports the aspiration to improve reliability but has concerns regarding the proposed benchmark.

A UK-wide target of 90 per cent may disproportionately favour urban areas. It is likely that Wales will be disproportionately represented in the remaining 10 per cent. Wales currently records the lowest average performance score of any UK nation, at 73%, illustrating the continuing coverage disparity between nations.

It will be important that the impact on rural areas is monitored. To this end Ofcom should consider:

- Introducing nation-specific benchmarks and monitoring of performance.
- Reporting progress separately for Wales, Scotland, Northern Ireland and England.
- Considering complementary benchmarks based on rurality.
- Monitor outcomes in highly rural and remote areas rather than relying solely on UK-wide averages.

Without such safeguards there is a risk that overall UK improvements mask continuing underperformance in rural areas.

Section 3 – Market-Led Improvements

Welsh Government recognises the potential benefits arising from the VodafoneThree merger and associated Network Commitment. However, Welsh Government remains concerned that improvements may be concentrated in areas with the strongest commercial returns rather than in the most challenging rural locations.

Ofcom states that the merger will result in a denser network and increased spectrum deployment. Welsh Government would welcome greater transparency regarding:

- The extent to which rural Wales will benefit from additional spectrum deployment.
- How Ofcom will monitor delivery in rural areas.
- What enforcement mechanisms are available if commitments are not delivered.

Rural communities are often more vulnerable to changes in network configuration because alternative sites may be limited. Ofcom should therefore monitor not only coverage outcomes but also the type of spectrum deployed, network capacity and user experience in rural areas throughout the integration programme.

The discussion paper acknowledges that the commercial case for rural investment remains weak. Welsh Government therefore urges Ofcom to consider how mobile network operators can be incentivised to invest in areas where the wider social and economic benefits exceed the immediate commercial returns.

Section 4 – Connectivity in Busy Areas

Welsh Government agrees that capacity constraints in busy urban locations require continued attention. However, similar challenges arise in Wales within seasonal

tourism hotspots where demand fluctuates significantly throughout the year. This causes network congestion during peak season and the consequent impact on residents, visitors, businesses and public services.

Welsh Government encourages Ofcom to ensure future work to enable coverage in busy areas includes:

- Coastal tourism destinations.
- National Park communities.
- Events and seasonal locations where temporary surges create capacity pressures.

Welsh Government notes that the paper presents planning as a significant barrier but provides limited evidence from industry on the scale and nature of that challenge. In terms of the overall number of planning applications submitted, and the number that have been refused against those approved and the reasons for those decisions, nor the timescale for determination. Further evidence would help ensure any recommendations are proportionate, targeted and evidence based.

While Welsh Government recognises the importance of enabling infrastructure deployment, any consideration of planning barriers must also reflect the need to protect landscapes, heritage assets, biodiversity, community amenity and designated areas such as National Parks. Ofcom's future work should therefore support a balanced approach that enables connectivity improvements while respecting the environmental and planning context in Wales.

Section 5 – Connectivity in Indoor Shared Places

Welsh Government support Ofcom's focus on indoor connectivity and recognise the role that landlords, venue operators and neutral-host providers can play in improving performance. Welsh Government would welcome further evidence regarding the most effective deployment models for public buildings and transport hubs across rural and semi-rural areas.

Welsh Government suggests that solutions beyond large-scale infrastructure should be explored for strengthening indoor connectivity. This could include practical consumer-facing solutions that are available to address indoor not-spots, including licence-exempt repeaters and signal-enhancement technologies, where these can be deployed without harmful interference.

Section 6 – Connectivity on Trains

Welsh Government strongly supports Ofcom's work examining rail connectivity. Improved rail connectivity would contribute to productivity, economic growth and a better passenger experience.

Access to mobile networks on trains can be dependent on the technology used. Any assessment of connectivity on trains should assess the differences between direct

mobile connectivity inside train carriages; and on-board Wi-Fi systems supported through external antennas and other backhaul solutions.

Experience from Welsh Government-supported trials, including the satellite and mobile connected Starbws, indicates that neither technology alone consistently delivers the levels of reliability required across the transport network. Evidence suggests that the most effective solutions combine outdoor cellular connectivity and Low Earth Orbit (LEO) satellite services. A complementary approach allows one technology to compensate where the other experiences constraints, providing a more resilient passenger experience. Ofcom should explore whether it could take further action to encourage complementary approaches.

In addition, there are other activities that could support connectivity on trains, Welsh Government recommends that Ofcom:

- Investigates whether rail corridors receive sufficient consideration within mobile network planning and whether relatively simple interventions, including antenna optimisation and reorientation, could improve coverage along existing routes.
- Consider the benefits of prioritised 5G standalone deployment along rail routes.
- Examines how prioritised 5G standalone deployment and network slicing could support transport operators through priority access arrangements and improved capacity management on busy sections of the network.
- Considers how emerging Future Railway Mobile Communication System (FRMCS) deployment could support long-term passenger connectivity.

Welsh Government's experience working with Transport for Wales also demonstrates that improvements can be delivered through operational and commercial changes as well as major infrastructure investment. Reviewing mobile backhaul arrangements, data allowances and service configurations can produce significant benefits at comparatively low cost. Ofcom should consider how examples of good practice can be shared across the rail sector and whether there are opportunities to facilitate closer engagement between mobile operators and train operating companies.

Welsh Government also considers wider transport connectivity to be strategically important. General outdoor performance measures may not fully capture the importance of trunk roads, rural A-roads, cross-border routes, tourism routes and routes serving hospitals, ports and key employment sites. Ofcom should therefore consider specific analysis of strategically important road and rail corridors, including cross-border corridors between Wales and England.

Section 7 – Connectivity in Rural Areas

Rural connectivity is of particular importance for Wales. While Ofcom recognises the challenges facing rural areas, the discussion paper focuses more on understanding the problem than on identifying practical solutions. Welsh Government considers the discussion paper insufficiently ambitious in relation to rural connectivity. Digital connectivity is an important economic and social driver, underpinning productivity and access to goods and services.

Welsh Government recognises the work already undertaken on extending rural connectivity through the Shared Rural Network, and the role Ofcom plays in monitoring compliance with the associated license obligations. Welsh Government is keen to understand how Ofcom intends to enforce the remaining 2027 obligations. In particular, will Ofcom commit to publishing a Wales-specific compliance trajectory and reporting framework rather than relying principally on UK aggregate reporting? What action will Ofcom take should operators fall behind on national level commitments?

While further evidence gathering and case studies will be valuable, there is already substantial evidence regarding the causes of poor rural performance and a range of emerging solutions. Ofcom should move beyond diagnosis and set out a timetable for how it can use the levers at its disposal to secure meaningful improvements for connectivity in rural areas. Greater emphasis should therefore be placed on identifying practical interventions and enabling the deployment of innovative models (for example, as set out above, combining outdoor cellular connectivity and Low Earth Orbit (LEO) satellite services) capable of delivering measurable improvements within clear timescales. Experience from projects in Wales suggests such models can help address some of the unique connectivity challenges associated with remote communities, visitor destinations and geographically constrained locations.

For Wales, rural connectivity is also a resilience and public safety issue. Rural communities can be more exposed to storms, power disruption and reliance on single sites, while mobile connectivity supports emergency calls, public warnings, mountain rescue, farming incidents, transport disruption and access to essential services. Ofcom should ensure that its work on reliable mobile performance is aligned with its wider work on network resilience. Furthermore, there is a question on whether current expectation around power backup provision at mobile sites remains sufficient, particularly for rural communities that may have no alternative communications options during periods of extended outages. It would be useful for outage reporting to be made available at a Welsh and local authority level in order to provide greater transparency and to help identify recurring vulnerabilities. Ofcom's consideration of these issues is set against a backdrop of the Telecoms Access Review and a regulatory period that will see commercial operators pursue widespread network transformation. The Openreach Exchange Exit programme will see significant change, particularly in rural Wales. Ofcom must consider these issues in the round.

Welsh Government supports Ofcom's proposal to undertake rural case studies but recommends these include Welsh locations reflecting distinct challenges such as: mountainous terrain, deep valleys, forested areas, coastal communities, seasonal tourism hotspots and sparse rural settlements. Case studies should assess both persistent not-spots and areas where coverage exists but performance remains poor.

To this end Welsh Government encourages Ofcom to examine how the deployment of the following could boost rural connectivity and consider what further action it could take to support:

- Small-cell solutions for rural settlements.

- Neutral-host deployment models.
- LEO Satellite-enabled backhaul.
- Local public networks.
- Additional spectrum sharing approaches.

Welsh Government would like Ofcom to consider how future spectrum policy could be used to ensure that it is best capable for serving rural areas. There is a strong precedent for linking access to valuable spectrum with geographic coverage obligations. Future spectrum awards and licence renewals should continue to carry meaningful Wales-specific geographic coverage commitments, and not just rely on UK-wide targets.

Ofcom may also be able to do more to promote and simplify its Shared Access Licensing regime. There may be opportunities for farms, ports, industrial sites, universities and other strategic locations in Wales to make greater use of private wireless solutions where conventional commercial deployment remains difficult.

Welsh Government believes that the impact of the retirement of legacy networks on rural communities should also be carefully considered. With 3G now largely withdrawn and 2G due to be retired over the coming years, there is a risk that some rural communities could be disproportionately affected, particularly where older networks continue to provide the most reliable service footprint. We would like to understand how Ofcom intends to ensure that network modernisation does not inadvertently worsen service availability in rural areas and what Wales specific assessments have been or will be undertaken.

Welsh Government has supported several innovation projects that may provide useful evidence, including rural small-cell deployments and the StarBws initiative. Lessons from these projects may help Ofcom identify practical and scalable solutions capable of improving connectivity in challenging rural environments.

Evidence from Welsh Government innovation programmes demonstrates that rural small cells can provide a practical means of bringing higher-capacity services closer to communities without the need for traditional macro-site deployments. Welsh Government encourages Ofcom to consider whether existing regulatory, commercial or operational barriers are limiting wider adoption of these solutions and how greater flexibility in deployment models, backhaul arrangements and network integration might support scaling.

Welsh Government believe mobile networks should be assessed through a stronger rural-proofing lens. Connectivity improvements should be measured not only by population served but by their ability to improve outcomes for rural communities, economic productivity and public services.

Future activity should also be aligned with devolved policy and delivery responsibilities in Wales, including planning policy, transport, tourism, economic development, rural development, public service delivery and digital inclusion. Early engagement with devolved governments will be essential if future options are to be practical, proportionate and deliverable.

Conclusions

Welsh Government welcomes Ofcom's ambition to improve the quality and reliability of mobile connectivity across the UK. However, Welsh Government considers that the value of this work will depend on whether it delivers meaningful and measurable improvements for rural, remote and geographically challenging areas, as well as locations where the commercial case for investment is strongest.

Welsh Government would welcome greater transparency, stronger evidence and more granular monitoring to support Ofcom's future work. This should include Wales-specific data, reporting by nation and rurality, targeted investigation of not-spots and clearer use of independent performance monitoring to identify persistent underperformance.

Welsh Government believes Ofcom should apply a stronger rural-proofing lens across its future work. This should ensure that rural Wales is properly reflected in case studies, that seasonal pressure points and strategic transport corridors are considered, and that network improvements are assessed by their impact on communities, economic productivity, public services and public safety as well as by population coverage.

Welsh Government also considers that Ofcom should move beyond diagnosis and place greater emphasis on practical interventions capable of delivering measurable improvements within clear timescales. This should include consideration of rural small cells, neutral-host deployment models, spectrum sharing, satellite-enabled services and further work to improve connectivity on rail routes, wider transport corridors and strategically important roads.

As the Shared Rural Network moves towards completion Welsh Government is keen to understand what will succeed it and what role Wales can play. Many of the technologies likely to shape the post-SRN landscape (including direct-to-device satellite services, neutral-host infrastructure, spectrum-sharing approaches and more sophisticated performance-based coverage management) have not yet been tested extensively at scale in the terrain where they are likely to matter most. Welsh Government suggests that Wales could become the designated testbed for the post-SRN era. As some examples Welsh Government could potentially support this through offering access to trial sites across the public estate, providing opportunities along Transport for Wales corridors, partnership working with National Park Authorities, and through coordinated support on planning, estates and grid-connection issues through a single administration. In return we would ask Ofcom to consider, supporting the establishment of rural mobile innovation zones in Wales, introducing streamlined innovation and spectrum licensing arrangements for rural trials, piloting any future rural measurement framework in Wales before wider UK deployment, and ensuring that Wales features centrally in future evidence-gathering and policy development relating to rural mobile connectivity.

Welsh Government would welcome consideration from Ofcom on the merits of moving the policy debate from coverage targets towards a minimum mobile service entitlement for citizens, similar to the broadband Universal Service Obligation. Initially this may be defined as reliable outdoor voice and basic data connectivity.

However, the aim could be to move from percentage coverage metrics and towards a discussion on the level of connectivity people should reasonably be able to expect when they enter contracts for mobile service wherever they live and with whichever mobile provider they contract with.

Welsh Government also encourages Ofcom to apply clear scrutiny to market-led commitments, including those associated with the VodafoneThree merger, and to engage early with devolved governments. This will be essential if future options are to be practical, proportionate and deliverable within the Welsh policy and delivery context.

Finally, we would like to set out the contribution that Welsh Government can make using some of the levers within our own control. For example, support through planning and permitted development arrangements, facilitating access to Welsh Government land and buildings, exploring incentives for deployment in persistently under-served areas, and providing a stronger "barrier-busting" function across government to help resolve practical delivery issues. We appreciate that the solution to achieving reliable mobile connectivity is a joint effort, best achieved by all parties working in partnership to help accelerate deployment.