

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?	Confidential? –N Wi-Fi Alliance welcomes Ofcom's decision to shift the emphasis from traditional geographic coverage metrics toward measurements that better reflect users' actual experience. Consumers care less about whether a network reports coverage than whether applications function reliably when and where they need them. Crowdsourced measurements provide a useful indication of real-world performance and represent a significant improvement over signal prediction models alone. However, user expectations continue to evolve. Connectivity is increasingly delivered through multiple complementary access technologies rather than a single radio interface. Smartphones routinely transition between cellular and Wi-Fi networks without user intervention, particularly indoors where Wi-Fi frequently provides superior performance. Ofcom should explicitly recognize Wi-Fi as an integral component of the UK's connectivity ecosystem. Mobile connectivity objectives are increasingly achieved through the combined use of licensed and licence-exempt technologies. Future policies, performance metrics, and deployment guidance should therefore consider how cellular networks and Wi-Fi work together to deliver the seamless, reliable connectivity that consumers and businesses expect. Accordingly, Wi-Fi Alliance encourages Ofcom to consider expanding future performance metrics to reflect the complete connectivity experience, including: - continuity of connectivity during transitions between cellular and Wi-Fi networks; - indoor application performance; - successful operation of Wi-Fi Calling; - reliability of latency-sensitive applications; - application completion rates rather than radio measurements alone. As emerging applications such as AI assistants, cloud computing, augmented reality and immersive collaboration become commonplace, metrics should continue evolving to reflect the quality of experience delivered to

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	users rather than characteristics of individual radio technologies. Future user experience will increasingly depend on next-generation Wi-Fi technologies operating in the 6 GHz band. Performance metrics should therefore recognize that spectrum policy directly affects the quality of connectivity consumers experience.
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?	Wi-Fi Alliance supports Ofcom's proposal to establish an ambitious benchmark based on user experience rather than theoretical coverage. A benchmark of 90% represents an appropriate balance between encouraging continuous improvement while recognizing that wireless performance naturally varies with location, demand and environmental conditions. However, Wi-Fi Alliance recommends that this benchmark remain technology-neutral. Consumers are interested in reliable connectivity rather than whether connectivity is delivered through licensed or licence-exempt spectrum. Future assessments should therefore recognize the increasingly important role of Wi-Fi in delivering overall connectivity performance.
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 Consumers increasingly need information that reflects how mobile services perform in the environments where they actually use them. While signal availability remains important, users also benefit from information regarding: - indoor performance; - performance during periods of congestion; - application performance; - reliability of voice and video communications; - availability of Wi-Fi Calling; - availability of seamless roaming technologies such as Passpoint/OpenRoaming. Providing these metrics would encourage competition based on overall user experience rather than signal coverage alone.

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	Wi-Fi Alliance congratulates Ofcom on the development of Map Your Mobile. Future enhancements could include: • indoor connectivity indicators; • time-of-day performance information; • identification of congestion-prone locations; • support for hybrid connectivity indicators; • information regarding Wi-Fi Calling availability by operator; • integration of application-level performance metrics. Longer term, Map Your Mobile could evolve toward presenting a comprehensive picture of users' connectivity experience across complementary wireless technologies.
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 Regarding “Biggest barriers” The discussion paper correctly identifies planning processes and site acquisition as important barriers. However, another challenge is that growing demand for wireless capacity cannot always be addressed economically through additional macro-cell deployment alone. Busy urban environments increasingly require complementary wireless infrastructure. Enterprise Wi-Fi, public Wi-Fi, neutral-host systems and small-cell deployments should all be considered components of a broader connectivity ecosystem. Increasingly, delivering better connectivity means integrating multiple wireless technologies rather than relying on any single technology. The principal regulatory barrier to realizing the full performance potential of next-generation Wi-Fi in the United Kingdom is timely access to sufficient licence-exempt spectrum, particularly in the upper 6 GHz band. In dense urban environments, expanding Wi-Fi access to spectrum may often provide greater improvements in user experience than incremental macro-cell deployment alone. Additional 6 GHz spectrum enables Wi-Fi networks to carry substantially greater traffic, relieving

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	pressure on mobile networks while improving connectivity for users. Regarding “Ofcom priorities” Wi-Fi Alliance recommends that Ofcom continue supporting policies that encourage: • hybrid connectivity architectures; • public-private collaboration; • deployment of high-capacity indoor Wi-Fi; • use of licence-exempt spectrum; • seamless interoperability between cellular and Wi-Fi networks. Regarding “Information Ofcom should publish” Examples of successful deployments. • Performance measurements comparing indoor and outdoor environments. • Best-practice guidance for local authorities. • Case studies illustrating how hybrid connectivity improves user experience.
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 Regarding “Biggest barriers” Indoor connectivity presents fundamentally different engineering challenges from outdoor mobile coverage. Building materials increasingly attenuate cellular signals while modern buildings generate growing wireless demand from workers, visitors, AI-enabled devices and IoT systems. Rather than attempting to deliver all indoor connectivity through outdoor macro networks, building owners should increasingly deploy dedicated indoor wireless infrastructure. Enterprise Wi-Fi already provides the primary broadband access technology inside most commercial buildings and should be recognized as an essential component of digital infrastructure. The availability of sufficient licence-exempt spectrum is one of the most important factors affecting indoor wire-

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	less performance. Enterprise buildings, hospitals, universities, shopping centres, airports and transport hubs increasingly depend on Wi-Fi to provide high-capacity indoor connectivity. Access to the upper 6 GHz band will allow these environments to fully benefit from Wi-Fi 7 capabilities, including wider channels, Multi-Link Operation and improved reliability. Regarding “Ofcom priorities” Ofcom should promote: • building-ready wireless infrastructure; • enterprise Wi-Fi deployment; • Wi-Fi Calling; • Passpoint/OpenRoaming; • guidance for building owners; • neutral-host solutions where appropriate. Indoor wireless infrastructure should increasingly be considered alongside electricity, fibre connectivity and other essential building services. Regarding “Information Ofcom should provide” • Best-practice deployment guides. • Case studies. • Performance benchmarks. • Economic studies illustrating benefits of high-quality indoor wireless. • Examples of successful hybrid deployments.
Section 6: Connectivity on trains • What do you think are the biggest barriers, technical and commercial, to achieving better mobile performance 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 pro-	Confidential? – N Regarding “Biggest barriers” Providing reliable connectivity on trains presents both technical and commercial challenges. Metal carriage construction, frequent handovers between cells, tunnels, cuttings and rapidly changing radio conditions all reduce the performance experienced by individual passenger devices. At the same time, passengers generate concentrated demand for high-capacity connectivity.

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vide further insights on in relation to connectivity on trains and why?	Rather than relying solely on direct cellular connections from every passenger device, onboard Wi-Fi offers an effective complementary solution. Modern onboard Wi-Fi systems can aggregate multiple cellular links—and, where appropriate, satellite backhaul—into a single high-capacity connection that is then efficiently distributed to passengers over Wi-Fi. This architecture reduces signaling overhead, improves spectral efficiency and delivers a more consistent user experience. Advanced Wi-Fi technologies (e.g., Wi-Fi 7 and Wi-Fi 8) will further increase onboard capacity while supporting lower latency and improved quality of service. These technologies allow train network operators to deliver higher passenger capacity, improved quality of service and lower latency but only with sufficient access to the 6 GHz spectrum. As passenger demand for bandwidth continues to increase, access to sufficient licence-exempt spectrum becomes an increasingly important component of modern rail connectivity. Regarding “Ofcom working with Government” Wi-Fi Alliance supports Ofcom's proposal. However, future work should explicitly consider hybrid connectivity architectures that combine: • mobile networks; • onboard Wi-Fi; • fibre where available; • satellite connectivity where appropriate. No single technology will provide optimal performance across the entire rail network. Regarding “Information Ofcom should publish” Comparative studies evaluating different onboard architectures. • Passenger experience metrics. • Case studies from international rail systems. • Performance comparisons between direct cellular access and onboard Wi-Fi solutions. • Best practices for deploying hybrid wireless connectivity.

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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?	Confidential? – N Improving rural connectivity is not solely a question of extending broadband availability—it is also a question of enabling users to fully benefit from that broadband once it reaches their homes, businesses, schools, and public facilities. Wi-Fi is the primary technology that delivers that final connectivity experience. Ensuring that Wi-Fi has access to sufficient licence-exempt spectrum, including the upper 6 GHz band, is therefore fundamental to achieving Ofcom's objective of providing reliable connectivity that people across the UK can count on. Regarding “Biggest barriers” Wi-Fi Alliance agrees that extending high-quality connectivity to rural areas presents significant economic and technical challenges. Lower population density, difficult terrain, and the higher cost of infrastructure deployment reduce the commercial incentive for investment in mobile networks. The economics of rural deployment remain challenging because lower population density reduces commercial incentives for network investment. No single technology will provide universal rural connectivity. The discussion should extend beyond improving cellular coverage alone. Rural connectivity increasingly depends on a combination of technologies, including fiber, fixed wireless access, satellite, and mobile broadband. Regardless of how broadband reaches a rural community, Wi-Fi is typically the primary technology used to distribute that connectivity within homes, farms, businesses, schools, healthcare facilities, and community buildings. As a result, the quality of the end-user experience depends not only on the performance of the access network, but also on the capability of the Wi-Fi network delivering connectivity to users and devices. A significant barrier to maximizing that performance is the lack of timely access to sufficient licence-exempt spectrum, particularly in the upper 6 GHz band. Without access to this spectrum, rural users will be unable to realize the full capabilities of Wi-Fi 7 and future Wi-Fi technologies, regardless of how broadband is delivered to their premises.

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	Regarding “Ofcom's main priorities” Ofcom should adopt a technology-neutral approach that focuses on the connectivity experience delivered to users rather than the individual technologies used to provide it. Accordingly, Wi-Fi Alliance recommends that Ofcom prioritize: • policies that encourage complementary use of mobile, fiber, fixed wireless, satellite, and Wi-Fi technologies; • timely availability of sufficient licence-exempt spectrum to support advanced Wi-Fi deployments; • regulatory certainty that encourages investment in next-generation Wi-Fi infrastructure; and • performance metrics that reflect the quality of connectivity experienced by users, regardless of the underlying access technology. The objective should be to ensure that rural consumers and businesses enjoy connectivity experiences comparable to those available in urban areas. Regarding “solutions that could improve rural mobile performance” There is unlikely to be a single technology capable of meeting all rural connectivity needs. Instead, the most effective approach will combine complementary technologies that leverage the strengths of each. Fiber, fixed wireless access, satellite, and mobile broadband each play important roles in extending broadband availability. However, in nearly every deployment scenario, Wi-Fi serves as the final distribution technology that connects users and devices to those broadband networks. Consequently, enabling advanced Wi-Fi should be recognized as an essential component of rural connectivity policy. Ofcom can support this objective by moving expeditiously to enable additional licence-exempt access to the upper 6 GHz band. Access to this spectrum will allow rural homes, businesses, schools, healthcare facilities, and

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	community networks to take full advantage of Wi-Fi 7 capabilities, including wider channels, Multi-Link Operation (MLO), increased capacity, lower latency, and improved reliability. Supporting advanced Wi-Fi therefore improves the performance of virtually every rural broadband technology rather than competing with them. Regarding “Information Ofcom should provide” Wi-Fi Alliance encourages Ofcom to publish additional analysis that reflects the performance of complete connectivity ecosystems rather than individual network technologies. Examples include: • comparative studies of hybrid connectivity architectures combining mobile, fiber, fixed wireless, satellite, and Wi-Fi; • measurements of user experience in rural homes, businesses, schools, and community facilities; • case studies demonstrating how advanced Wi-Fi enhances the value of broadband infrastructure investments; and • analysis of how access to additional licence-exempt spectrum contributes to improved rural connectivity outcomes. Understanding the contribution of Wi-Fi to rural connectivity will help ensure that future policy decisions maximize the value of investments across the entire communications ecosystem.

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